



Hand in Hand Foundation

Policy on safeguarding people with disabilities

2017.

I. Introduction

The goal of this policy (henceforward also referred to as “Safeguarding Policy” or “the Policy”) is to ensure that the target group of Hand in Hand Foundation (people with disabilities) are not affected by any kind of abuse caused by the persons engaged, commissioned or contracted to work with or for Hand in Hand Foundation in any capacity. A further goal is to take effective measures to reveal and handle any suspicious cases that might imply any form of abuse. The Policy focuses on the prevention, exploration, identification of the suspicious cases and on the measures the Foundation is to take.

II. Mission, values, commitments, scope, principles

Our goal

Hand in Hand Foundation has been working for the creation of a community in which people with disabilities can live with dignity since its foundation in 1993. Our work has always been centred on the needs of people with disabilities, whom we try to reach in their own environment, both directly and indirectly, in all phases of their lives. Just as the hand is equally connected to all five fingers, the Foundation serves its target groups, i.e. people with disabilities, their families, their supporters, the organisations providing care for them, as well as the society surrounding them as a whole, integrated unit.

Our mission is to empower individuals with disabilities directly, through their families, through professionals and organizations and through the whole society so that they can **live their life with dignity**.

Our core values

- **Empowerment** – Empowering and supporting people with disabilities through their families and through the professionals and the service providers working in the social care sector so that they can live and work reaching their full potential.
- **Dignity** – Every individual, thus also people with disabilities are worthy of honour and respect and deserve to feel valued, accepted and acknowledged in their communities and in the whole society.
- **Partnership** – Finding the best solutions working, thinking, planning and acting together with each other and with others.

Our target groups involve vulnerable individuals including persons with disabilities: children and adults - vulnerable adults.

The definition of disability: The UN Convention on the Rights of Persons with Disabilities (UNCRPD) recognises that “disability is an evolving concept” (UNCRPD, 2006, p. 1). “Persons with disabilities include those who have long-term physical, mental, intellectual or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others.” (UNCRPD, 2006, p. 4).

The term of children: anyone under the age of 18.

The term of vulnerable adults: persons at the age of 18 or above who are or may be unable to take care of themselves or unable to protect themselves against significant harm, exploitation, abuse, and neglect by the reasons of disability, age, state of life or illness.

Persons with disabilities (children and adults alike) are one of the most vulnerable groups of our society, therefore they are more likely to face increased risks of harm.

Hand in Hand Foundation is committed to the well-being and safeguarding of persons with disabilities. ***Safeguarding means protecting the persons' rights to live in safety, free from harm, abuse, neglect, and exploitation.***

We firmly believe that it is important to operate and provide our services based on the Safeguarding Policy for the above-mentioned target groups.

The scope of the Policy:

The Policy applies to all persons engaged, commissioned or contracted to work with or for Hand in Hand Foundation in any capacity: staff members, Board members, volunteers, apprentices, external experts, consultants etc.

Hand in Hand Foundation will work with cooperating organisations and partners also on the basis of the rules defined in this Policy.

Principles of the Policy:

- All persons with disabilities (children and adults alike) have equal rights to protection from harm, abuse, neglect, and exploitation.
- Hand in Hand Foundation is committed to promoting the rights set out in the UN Convention on the Rights of Persons with Disabilities (UNCPRD, 2006.), as well as those defined in the Hungarian legislation in force (Law on the Rights of People with Disabilities and Equal Opportunities).
- Our Foundation, as an organisation takes responsibility of protecting persons with disabilities (children and adults alike) from abuse with whom we are in direct contact with, or who are directly affected by our work and services.
- Preventing that people with disabilities become victims of any form of abuse and protecting people with disabilities from abuse are the responsibility of all persons in their work. Thus all persons engaged, commissioned or contracted to work with or for Hand in Hand Foundation in any capacity need to contribute to this by preventing harm, detecting and reporting neglect and abuse.
Hand in Hand Foundation offers preparation sessions related to these responsibilities.
- Hand in Hand Foundation has a responsibility to represent and promote the safeguarding principles and to help our partners meet the minimum requirements of safeguarding.
- All our decisions are made and all our actions are taken focusing on the best interest of persons with disabilities (children and adults alike) and stressing the principle of supported decision-making.
- We need to ensure that people with disabilities (children and adults alike) can exercise their rights in a way that enables them also to form and express their own opinions.
- In case of children, we always need to apply a children-centred approach taking into account the child's age, maturity, opinion, needs, and concerns. The children and their parents or carers (whoever their legal representative is) always need to be informed about any decisions or actions that are related to the children and also about their rights.
- We are committed to pay special attention to the communication needs and limitations of people with disabilities whom we are in direct contact with and to take effective measures in order to support them in their communication with us.
- We have zero tolerance against all forms of harm, including abuse, exploitation, and neglect of persons with disabilities (children and adults alike). Our work seeks to make the community more secure and we will not build and maintain professional relationships with any persons, or end the relationship immediately taking also the appropriate measures with those persons, who pose a risk to persons with disabilities (children and adults alike).
- Any complaints, concerns, reports received by our Foundation that are related to the violation of rights of persons with disabilities (children and adults alike) are investigated

and all the necessary measures (within the scope of our competence) are taken to protect those least able to protect themselves. These measures are communicated to everyone transparently and precisely.

- Careful recruitment procedures (for the recruitment of employees, volunteers, apprentices etc.) also serve the safeguarding of people with disabilities.
- A duty of confidentiality obliges all persons engaged, commissioned or contracted to work with or for Hand in Hand Foundation to respect the confidentiality of any personal information or data related to persons with disabilities (children and adults alike). Any personal data or information can be shared with a third party only with the written permission of the person or in the case of obligatory supply of information to the authorities as specified in the law.
- Hand in Hand Foundation works in cooperation with other national and international organisations for the benefit of persons with disabilities (children and adults alike), in our joint work we share the best practices related to the safeguarding of persons with disabilities with each other.

III. Definition, types, and indicators of abuse

Hand in Hand Foundation has zero tolerance against all forms of harm, including abuse, exploitation, and neglect of persons with disabilities (children and adults alike).

Abuse is defined in the report of the Council of Europe, 2003: Safeguarding adults and children with disabilities against abuse <https://rm.coe.int/16805a297e> (page 9) - accessed 13.07.2017 - as follows:

“Abuse is defined as:

Any act, or failure to act, which results in a significant breach of a vulnerable person’s human rights, civil liberties, bodily integrity, dignity or general well-being, whether intended or inadvertent, including sexual relationships or financial transactions to which the person has not or cannot validly consent, or which are deliberately exploitative.

Abuse may be perpetrated by any person (including by other people with disabilities) but it is of special concern when it takes place within a relationship of trust characterized by powerful positions based on:

- legal, professional or authority status;
- unequal physical, economic or social power;
- responsibility for the person’s day-to-day care;
- and/or inequalities of gender, race, religion or sexual orientation.

It may arise out of individual cruelty, inadequate service provision or society’s indifference.

It requires a proportional response – one which does not cut across valid choices made by individuals with disabilities but one which does recognize vulnerability and exploitation.”

The same document (Council of Europe, 2003: Safeguarding adults and children with disabilities against abuse <https://rm.coe.int/16805a297e> (page 33) - accessed 13.07.2017) defines the types of abuse as follows:

“Abuse may be categorized at different levels. At a basic level, it may take different forms including

- physical violence, including abusive use of corporal punishment, incarceration including being locked in one’s home or not allowed out, over or misuse of medication, medical experimentation or involvement in invasive research without consent;
- sexual abuse and exploitation, including rape, sexual aggression, indecent assaults, indecent exposure, involvement in pornography and prostitution;
- psychological threats and harm usually consisting of verbal abuse, intimidation, harassment, humiliation or threats of punishment or abandonment, emotional blackmail, arbitrariness,

withholding adult status and infantilising disabled persons (see Département de la prévoyance sociale et des assurances 1997:12);

- interventions which violate the integrity of the person, including educational, therapeutic and behavioural programmes;
- financial abuse, fraud, and theft of belongings, money or property;
- neglect, abandonment and deprivation, this may be physical or emotional and includes an often cumulative lack of health care or negligent risk-taking, withdrawal of food or drink or other necessities of daily living including in the context of educational or behavioural programmes."

Many types of abuse have recognisable signs or indicators. The reasons behind these always need to be clarified carefully. The types and **indicators of abuse** are also defined by the Social Care Institute for Excellence in their document "At a glance 69: Adult safeguarding: Types and indicators of abuse" (2015) <http://www.scie.org.uk/publications/ataglance/69-adults-safeguarding-types-and-indicators-of-abuse.asp> (accessed 13.07.2017)

"Possible indicators of physical abuse

- No explanation for injuries or inconsistency with the account of what happened
- Injuries are inconsistent with the person's lifestyle
- Bruising, cuts, welts, burns and/or marks on the body or loss of hair in clumps
- Frequent injuries
- Unexplained falls
- Subdued or changed behaviour in the presence of a particular person
- Signs of malnutrition
- Failure to seek medical treatment or frequent changes of GP"

"Possible indicators of sexual abuse

- Bruising, particularly to the thighs, buttocks and upper arms and marks on the neck
- Torn, stained or bloody underclothing
- Bleeding, pain or itching in the genital area
- Unusual difficulty in walking or sitting
- Foreign bodies in genital or rectal openings
- Infections, unexplained genital discharge, or sexually transmitted diseases
- Pregnancy in a woman who is unable to consent to sexual intercourse
- The uncharacteristic use of explicit sexual language or significant changes in sexual behaviour or attitude
- Incontinence not related to any medical diagnosis
- Self-harming
- Poor concentration, withdrawal, sleep disturbance
- Excessive fear/apprehension of, or withdrawal from, relationships
- Fear of receiving help with personal care
- Reluctance to be alone with a particular person"

"Possible indicators of psychological or emotional abuse

- An air of silence when a particular person is present
- Withdrawal or change in the psychological state of the person
- Insomnia
- Low self-esteem
- Uncooperative and aggressive behaviour
- A change of appetite, weight loss/gain
- Signs of distress: tearfulness, anger
- Apparent false claims, by someone involved with the person, to attract unnecessary treatment"

“Possible indicators of financial or material abuse

- Missing personal possessions
- Unexplained lack of money or inability to maintain lifestyle
- Unexplained withdrawal of funds from accounts
- Power of attorney or lasting power of attorney (LPA) being obtained after the person has ceased to have mental capacity
- Failure to register an LPA after the person has ceased to have mental capacity to manage their finances, so that it appears that they are continuing to do so
- The person allocated to manage financial affairs is evasive or uncooperative
- The family or others show unusual interest in the assets of the person
- Signs of financial hardship in cases where the person’s financial affairs are being managed by a court appointed deputy, attorney or LPA
- Recent changes in deeds or title to property
- Rent arrears and eviction notices
- A lack of clear financial accounts held by a care home or service
- Failure to provide receipts for shopping or other financial transactions carried out on behalf of the person
- Disparity between the person’s living conditions and their financial resources, e.g. insufficient food in the house
- Unnecessary property repairs”

In case of children the definitions determined by the World Health Organisation (WHO) are as follows:

“Child maltreatment is the abuse and neglect that occurs to children under 18 years of age. It includes all types of physical and/or emotional ill-treatment, sexual abuse, neglect, negligence and commercial or other exploitation, which results in actual or potential harm to the child’s health, survival, development or dignity in the context of a relationship of responsibility, trust or power. Exposure to intimate partner violence is also sometimes included as a form of child maltreatment.” (Source: <http://www.who.int/mediacentre/factsheets/fs150/en/> , accessed 04.12.2017)

“Within this broad definition, five subtypes can be distinguished – physical abuse; sexual abuse; neglect and negligent treatment; emotional abuse; and exploitation.” (Source: http://www.who.int/topics/child_abuse/en/ , accessed 04.12.2017)

“Physical abuse

Physical abuse of a child is defined as the intentional use of physical force against a child that results in – or has a high likelihood of resulting in – harm for the child’s health, survival, development or dignity. This includes hitting, beating, kicking, shaking, biting, strangling, scalding, burning, poisoning and suffocating. Much physical violence against children in the home is inflicted with the object of punishing.

Sexual abuse

Sexual abuse is defined as the involvement of a child in sexual activity that he or she does not fully comprehend, is unable to give informed consent to, or for which the child is not developmentally prepared, or else that violates the laws or social taboos of society. Children can be sexually abused by both adults and other children who are – by virtue of their age or stage of development – in a position of responsibility, trust or power over the victim.

Emotional and psychological abuse

Emotional and psychological abuse involves both isolated incidents, as well as a pattern of failure over time on the part of a parent or caregiver to provide a developmentally appropriate and

supportive environment. Acts in this category may have a high probability of damaging the child's physical or mental health, or its physical, mental, spiritual, moral or social development. Abuse of this type includes: the restriction of movement; patterns of belittling, blaming, threatening, frightening, discriminating against or ridiculing; and other non-physical forms of rejection or hostile treatment.

Neglect

Neglect includes both isolated incidents, as well as a pattern of failure over time on the part of a parent or other family member to provide for the development and well-being of the child – where the parent is in a position to do so – in one or more of the following areas:

- health;
- education;
- emotional development;
- nutrition;
- shelter and safe living conditions.” (Source: World Health Organization and International Society for Prevention of Child Abuse and Neglect (2006) Preventing child maltreatment: a guide to taking action and generating evidence. Chapter 1. The nature and consequences of child maltreatment". Page 10.

http://apps.who.int/iris/bitstream/10665/43499/1/9241594365_eng.pdf , accessed 04.12.2017)

All persons engaged, commissioned or contracted to work with or for Hand in Hand Foundation in any capacity need to be aware of the different forms and indicators of abuse. Our Foundation supports this by providing them with preparation sessions involving also experts in the field (e.g. psychologists or legal experts). The material used in the sessions is available to all participants.

IV. Management of risks, responsibilities

Hand in Hand Foundation has analysed the various risk areas within the operation of the organisation and set up safeguarding measures, defining also the responsibilities of the different persons involved.

The scope of the Policy includes all our fields of operation and all our programmes and projects are to work on the basis of that compulsorily.

General responsibilities:

Safeguarding persons with disabilities (children and adults alike) who are in direct contact with any of the programmes or projects of the Foundation is our common responsibility and all persons engaged, commissioned or contracted to work with or for Hand in Hand Foundation need to be aware of their roles and responsibilities related to that and need to act accordingly.

Within this Policy Hand in Hand Foundation covers the safeguarding of all persons with disabilities (children and adults alike) who are direct users of any of its services or who are directly involved in the Foundation's work in any capacity.

The Policy is approved by the Advisory Board and also reviewed if needed. The Board follows up on the realization of the Policy and takes the necessary measures within its scope of authority. The General Director is responsible for the implementation and realization of the Policy.

The General Director is the **dedicated person** who - when abuse is suspected - is responsible for the measures defined in the Policy, for co-ordinating the realization of the measures and for taking the measures within the organisation and towards external authorities.

The General Director is responsible for

- the implementation, monitoring, and evaluation of the Policy and of the measures taken on the basis of the Policy;
- ensuring that all employees, volunteers, apprentices and all other persons engaged, commissioned or contracted to work with or for Hand in Hand Foundation are aware of their safeguarding responsibilities and that they get the necessary information and preparation sessions related to that;
- ensuring that all persons engaged, commissioned or contracted to work with or for Hand in Hand Foundation sign the Safeguarding Code of Conduct that is included in the Policy;
- implementing and operating procedures related to safe recruitment, to data protection and to the right to privacy;
- cooperating with partners in accordance with the safeguarding rules defined in the Policy;
- raising public awareness of the safeguarding of persons with disabilities (children and adults alike).

The General Director and the leaders of the different working groups/projects/departments of the Foundation have - beyond their professional work - also the following duties:

- Receive and manage information on safeguarding issues from employees, volunteers, apprentices, clients, parents, participants and from all other persons engaged, commissioned or contracted to work with or for Hand in Hand Foundation.
- All suspicions of abuse are taken seriously and are handled taking the appropriate measures.
- Evaluate the received information accurately and thoroughly and if necessary, also gather additional information to clarify the issues.
- Provide advice and information related to safeguarding concerns, issues to those who request it.
- If there is a reasonable suspicion of infringement, take the necessary measures to ensure that the supposed victim can access the available legal remedies, victim protection, support and assistance services or forums to make complaints (e.g. initiation of criminal proceedings; contacting The Equal Treatment Authority <http://www.egyenlobanasmod.hu/eng>; contacting the Office Of The Commissioner Of Fundamental Rights <http://www.ajbh.hu/en/web/ajbh-en/>; initiation of civil proceedings; making complaints at the relevant authorities; accessing integrated legal protection services, contacting the child protection authorities).
- Discuss general safeguarding questions and issues and share best practices at the team meetings.

All persons engaged, commissioned or contracted to work with or for Hand in Hand Foundation need to

- participate in the safeguarding of persons with disabilities (children and adults alike) supportively and actively;
- be aware of their role in safeguarding issues, and in order to do that, to take part in the obligatory preparation sessions;
- ensure that they are familiar with and understand the Safeguarding Policy and work accordingly;
- apply the principle of reasonable diligence in their work and in relation to any safeguarding issues;
- understand and sign the Safeguarding Code of Conduct included in this Policy;
- deal with any incidents or suspicion of abuse in accordance with the Policy, following the measures;
- act as follows in case of any incidents or suspicion of abuse depending on who the supposed aggressor is:

- 1) If the supposed victim discloses that he/she had been abused by an external person (who is not related to the Foundation in any capacity), he/she needs to be supported to make a complaint at the relevant forums/authorities and to access those services that can help him/her in this case.
 - 2) If the supposed victim discloses that he/she had been abused by an internal person (who is related to the Foundation in any capacity), he/she needs to be supported to make a complaint to the General Director. This can be done on the basis of the "Policy on making complaints" that is also available to the service users of the Foundation in a form that suits their communication abilities.
 - 3) If it is witnessed or suspected that an internal person (who is related to the Foundation in any capacity) is the supposed aggressor, the case needs to be reported to the General Director involving also the supposed aggressor and the supposed victim in order to clarify the issue.
- document every safeguarding incidents and issues according to the related protocol;
 - respect the rights of persons with disabilities (children and adults alike) and treat people with disabilities with dignity in all aspects of their activities.

V. Safe recruitment

The term „recruitment“ covers the recruitment of new employees, volunteers, and apprentices and the involvement of new external experts and consultants who are commissioned or contracted to work with or for Hand in Hand Foundation.

The safe recruitment process is to ensure that only those persons can work with and for our Foundation who are committed to our values and to the safeguarding of persons with disabilities.

The selection process is different if we already have candidates who we have had worked previously and have a trusting work relationship with (typically in projects where – from time to time- we involve external experts and consultants for a given period of time) and in the case when a role needs to be advertised in search of new, unknown candidates. The General Director is to decide which selection process is to follow in a given recruitment case.

In the case of well-known and trusted candidates, we do not require any references or evidence to prove their commitment to the safeguarding of persons with disabilities but these candidates also need to sign the Safeguarding Code of Conduct (included in the Policy) when signing their contracts.

If a role needs to be advertised in search of new, unknown candidates, we apply the following safeguarding measures in our selection process:

- The CV's and motivation letters of the applicants are evaluated by the General Director and the relevant workgroup/department/project leader and they determine which candidates can be fitting for the role (8-10 persons). These persons are invited for the first personal interview.
- The first personal interview includes a discussion of the applicants' previous work with persons with disabilities, with pre-defined questions assessing their commitment to the safeguarding values. In this interview, the applicants are asked to provide at least 2 referees (including referees in relation to their suitability to work with persons with disabilities). References from personal friends or members of the family are not acceptable.
- After the first interview, the General Director and the relevant workgroup/department/project leader select those applicants who can participate in the second personal interview (3-5 persons). Before the second personal interview, the candidates' references and qualifications are verified. If this is successful, the applicants can be invited for the interview.

- After the second interview, the General Director and the relevant workgroup/department/project leader rank the 3 best candidates and offer the role to the best applicant. The applicant who accepts the role is to sign the Safeguarding Code of Conduct (included in the Policy) that also contains a declaration of not having any criminal record related to any safeguarding issue, of not being under the scope of professional disqualification and of not being excluded from public affairs.

The new colleagues cannot start their activities at the Foundation without understanding the Safeguarding Policy, their roles and responsibilities in the safeguarding of persons with disabilities (children and adults alike), and without signing the Safeguarding Code of Conduct (included in the Policy). All new colleagues are provided with preparation sessions and support so that they can fully embrace these.

VI. Safeguarding Code of Conduct

Hand in Hand Foundation commits itself to create and maintain a working environment which promotes its core values and the safeguarding of persons with disabilities (children and adults alike). All persons engaged, commissioned or contracted to work with or for Hand in Hand Foundation in any capacity are expected to uphold the dignity and equality of the beneficiaries/service users (children and adults with disabilities) of Hand in Hand Foundation by ensuring that their personal and professional conduct is of the highest standard at all times.

All persons engaged, commissioned or contracted to work with or for Hand in Hand Foundation in any capacity will:

1. treat other people with dignity and respect, without any forms of discrimination, harassment, abuse, neglect or exploitation;
2. take reasonable action to protect others from harm and always create and maintain an environment that prevents all forms of abuse and exploitation;
3. keep clean and professional boundaries and appropriate behaviour in the workplace;
4. inform the beneficiaries/service users of the Foundation about their rights to make complaints and about the ways of making a complaint related to any of the services they are directly involved in;
5. involve persons with disabilities (children and adults alike) in decision-making processes that directly affect them on the basis of the principle of supported decision-making;
6. report and document any suspicion of infringement, threat or abuse (within the scope of the Policy) related to the beneficiaries/service users of the Foundation to the workgroup/project/department leader they directly report to and to the General Manager. Within the organisation the General Manager handles the reports (involving also the persons affected by the case), investigates the cases and decides about any legal remedies that might be needed (e.g. initiating disciplinary proceedings, informing the relevant authorities etc.)
7. treat any personal data confidentially in line with the Hungarian data protection and data management regulations;
8. respect the right to privacy of the beneficiaries/service users of the Foundation;
9. always ask permission from the beneficiaries/service users (in case of children and persons under guardianship also from their parent or legal representative/guardian) of the Foundation before taking images or making recordings (e.g. sound recordings, videos) of them. Respect their decision to say no;
10. ensure that any images/video recordings taken or sound recordings made of the beneficiaries/service users of the Foundation are decent and do not have any negative impact on their dignity or privacy;
11. follow and respect the rules of the Safeguarding Code of Conduct;
12. apply the principle of reasonable diligence in their work and in relation to any safeguarding issues even in those cases that are not covered by the Safeguarding Policy and by the Safeguarding Code of Conduct.

All persons engaged, commissioned or contracted to work with or for Hand in Hand Foundation in any capacity will never:

1. engage in any penal sexual relationship or in any relationship that is against the good morals with any beneficiaries/service users of the Foundation or with any persons with disabilities involved in any project/programme of the Foundation. Any type of sexual relationship and any abusing behaviour with any person under the age of 18 is strictly forbidden. Mistaken belief in the age of a child is not a defence;
2. exchange money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour with any beneficiaries/service users of the Foundation or with any persons with disabilities involved in any project/programme of the Foundation (children and adults alike);
3. be intoxicated under the influence of alcohol or drugs while working with the beneficiaries/service users of the Foundation or in any other cases when representing the Foundation;
4. never use the organisation's computers or other equipment to view, download, create or distribute any inappropriate material (e.g. pictures or videos of pornography/violence etc.);

Any breach of the Safeguarding Code of Conduct or any behaviour that is in conflict with the Safeguarding Policy will be the cause for investigation and for possible disciplinary measures or dismissal/ termination of the contract (in case of Judgement-in-law). The General Director has the right to decide about the measures taken within the legal limits.

All persons signing the Safeguarding Code of Conduct is to declare as follows:

"I have carefully read and understood the Safeguarding Code of Conduct of Hand in Hand Foundation. I am aware that Hand in Hand Foundation expects me to uphold the standards of behaviour described in the Safeguarding Code of Conduct at all times. I accept that in case of non-compliance Hand in Hand Foundation will take the necessary legal measures. I hereby declare under the penalties of perjury that I have not been convicted of any felony, I do not have a criminal record, I am not under the scope of professional disqualification and I am not excluded from public affairs. I declare that all information provided by myself to Hand in Hand Foundation is true and correct."

VII. Preparation

It is important that all persons engaged, commissioned or contracted to work with or for Hand in Hand Foundation in any capacity fully understand and embrace the idea of safeguarding persons with disabilities (children and adults alike), are able to recognize the signs of any form of abuse and neglect and, in the event of a suspicion or fact, they know how to proceed.

In order to support our colleagues to fulfil their responsibilities in safeguarding, Hand in Hand Foundation provides them with the following obligatory preparation sessions:

- All new colleagues (staff, volunteers, apprentices, external experts, consultants etc.) are given a detailed introduction on the Safeguarding Policy. This is done before starting their activities at the Foundation. The introduction is given to them by the person they directly report to (in case of staff, volunteers, and apprentices) or by the General Director (in case of external experts, consultants etc.). The new colleagues are to sign a declaration stating that the introduction has been given to them.
- In relation to the implementation of the Policy preparation sessions and afterward yearly


refresher sessions are held to the colleagues (staff, volunteers, apprentices, external experts, consultants etc.) who have been working uninterruptedly with the Foundation for more than one year. The sessions are held by the persons appointed by the General Director (if possible also involving experts in the field, e.g. psychologists or legal experts). These sessions need to be documented by attendance registers. The returning external experts, consultants etc. who are typically involved in projects – from time to time – for a given period of time, receive refresher briefings from the General Director when signing their contracts and they are to sign a declaration stating that the briefing has been given to them.

- Those persons working for the Foundation, who work in direct contact with the beneficiaries/service users of the Foundation, are given the opportunity to have regular supervision sessions.
- All persons engaged, commissioned or contracted to work with or for Hand in Hand Foundation in any capacity are provided with and have access to the Safeguarding Policy (in electronic and in printed form as well).
- The Safeguarding Policy is publicly available on our official website in Hungarian, in English and also in easy to understand format. Hand in Hand Foundation is open to share the Policy with any organisations and individuals who request a copy.

VIII. Partnerships

Hand in Hand Foundation has a broad partnership range, including: state bodies/organisations, national and international NGOs, donors, entrepreneurs, and suppliers etc. Each Contracting Party must accept the principles laid down in the Safeguarding Policy and all written agreements between the Foundation and its partners are to reflect a shared commitment to them.

Hand in Hand Foundation and its partners support each other in the safeguarding of persons with disabilities (children and adults alike), sharing with each other the knowledge, best practices and also resources, if needed.

Hand in Hand Foundation pays special attention to keep persons with disabilities (children and adults alike) safe in all projects and programs we are involved in with other organisations. 

IX. Publication of sound recordings, photos, and videos, data and privacy protection, communication, online safety

Photos, sound and video recordings of the beneficiaries/service users (children and adults with disabilities) of the Foundation can be made upholding the following rules (which are in line with our Procedure on Making and Publishing Photos of the Beneficiaries):

1. Always ask (preferably written) permission from the beneficiaries/service users - in case of children and persons under guardianship also from their parents or legal representative/guardian - of the Foundation before taking images or making recordings (e.g. sound recordings, videos) of them and before publishing these on the different official online platforms of the Foundation (e.g. website, Facebook, youtube channel, newsletter, press release). Respect their decision to say no. The permission can be withdrawn any time. Hand in hand Foundation has a declaration form to use. All personal data (included in the declaration form or in any other document i.e. the Reporting form)

is handled confidentially in line with the national regulations in force. The Foundation informs all persons involved about their rights and about their legal remedy options related to personal data protection and management;

2. Before taking images or making recordings (e.g. sound recordings, videos) of the beneficiaries/service users of the Foundation always inform them why these recordings are made and how, when and where these will be published on the different official online platforms of the Foundation (e.g. website, Facebook, youtube channel, newsletter, press release).
3. Before making and publishing images or recordings (e.g. sound recordings, videos) of the beneficiaries/service users of the Foundation always consider whether their publishing causes any harm to the beneficiaries or to their families in any way.
4. Ensure that any images/video recordings taken or sound recordings made of the beneficiaries/service users of the Foundation are decent (e.g. appropriate dressing and appearance) and do not have any negative impact on their dignity or privacy.
5. Ensure that the personal data of the persons appearing on the recordings are handled confidentially and that the persons cannot be identified on the basis of the data that appear on the recordings unless we have their permission related to it.
6. The recordings are kept properly and safely by the Foundation so that no unauthorized person can access them.
7. The persons appearing on the recordings are encouraged to share their concerns about the recordings and their publishing even after the disclosure of the recordings. In case of serious concerns (i.e. the recordings and their publishing have a serious negative impact on the persons) or upon the request of the persons appearing on the recordings, the recordings need to be removed from the official online platforms of the Foundation where possible (e.g. website, Facebook, youtube channel) and cannot be published anywhere else.

Online safety:

Our beneficiaries/service users are encouraged to use the internet and the different forms of social media safely. The communication at the official open platforms of the Foundation (e.g. Facebook groups, youtube channel) are controlled and we also pay attention to the safety of the participants.

The persons engaged, commissioned or contracted to work with or for Hand in Hand Foundation in any capacity can make contact with children on social media platforms related to their work only if the given project/programme is based specifically on the tools of the social media (e.g. "Kézenfogva Ballagunk" – „Leaving high school Hand in Hand”). This can be done only upholding the strict rules of the data protection policy related to the given project/programme (e.g. involving children in any of the projects/programmes is only possible with the approval of their legal representatives/guardians). Hand in Hand Foundation does not have any services for children that imply direct contact with them on online platforms (i.e. chat). We do not make contact with children with disabilities (as a part of our target group) using the tools of social media, involving them in our services/projects/programmes (e.g. family therapy or legal aid service) is done on the basis of the protocols related to the given services/projects/programmes.

We use hidden personal addresses in mass e-mails and in our newsletters. Our online databases are protected so that no unauthorized person can access them.

X. Reporting mechanism and case management

Hand in Hand Foundation declares that all concerns and suspicions related to the well-being and security of the beneficiaries/service users of the Foundation (children and adults with disabilities) should always be investigated and acted upon swiftly.

All information regarding any safeguarding concerns/issues is kept confidential. Any information shared are done so on a 'need to know' basis (which includes the General Director and may include the relevant workgroup/project/department leader(s), the statutory authorities and the parents/caregivers or legal representatives/guardians of the beneficiaries affected by the case) and with the knowledge of those concerned.

If any person engaged, commissioned or contracted to work with or for Hand in Hand Foundation in any capacity suspects/witnesses any form of abuse, neglect, exploitation or maltreatment of the beneficiaries/service users of the Foundation or if any beneficiary/service user of the Foundation makes a disclosure about a maltreatment, the following actions need to be done immediately:

- report it to the relevant workgroup/project/department leader and to the General Director (also in oral and written form is possible but in written form compulsorily);
- the report needs to be documented properly;
- the written report should include details about the person making the report (name, address, contact details, job title), details about the beneficiary/service user affected by the maltreatment (name, address, contact details, type of the service or name of the project of the Foundation the beneficiary/service user is involved in) and details about the suspicion/concern (witnessed or suspected, date, time, place, people involved, nature of the concern, actions taken by the person making the report) – see attachment 1: Reporting form;
- any personal data included in the Reporting form needs to be treated confidentially in line with the Hungarian data protection and data management regulations;
- the Reporting form needs to be sent to the General Director of Hand in Hand Foundation either by e-mail or in paper format within 24 hours of getting the information about the case.

If a disclosure about a maltreatment is made by a beneficiary/service user of the Foundation, the person receiving this complaint should:

- listen carefully and accept what is being said without pressing for information;
- reassure the person that he/she has done the right thing by telling it to him/her;
- let the person know that this information has to be shared with the designated persons and cannot be kept as a secret;
- let the person know what will happen next;
- make an immediate risk assessment and do whatever can be done to ensure the safety of the beneficiary/service user affected by the maltreatment;
- document the disclosure immediately and report it to the relevant workgroup/project/department leader and to the General Director.

When receiving the report, within 72 hours the General Director will:

- evaluate the received information accurately and thoroughly and if necessary, gather additional information to clarify the issues involving also the relevant colleagues, if needed;
- gather the relevant colleagues to form a focus group to investigate what measures need to be done, what experts (legal experts, psychologists/psychiatrists, doctors) or organisations need to be involved, what authorities need to be contacted, what procedures need to be initiated;

- provide advice and information to those affected by the case;
- undertake a risk assessment and ensure the safety of the affected beneficiary/service user;
- investigate if there is evidence of any criminal offense;
- inform the following persons/authorities as soon as possible (if appropriate): the parents/caregivers/legal representatives/guardians of the affected beneficiary/service user, the police, and the relevant authorities;
- take disciplinary action and/or any other action which may be appropriate to the circumstances;
- investigate if any organisational policy needs to be amended or if the members of the organisation need any further training on safeguarding so that a similar case cannot happen in the future.

If the accused person is the General Director, the tasks and responsibilities assigned to him/her in this Policy are taken over by the Advisory Board Director.

If the accused person is anyone who has a labour contract with Hand in Hand Foundation, the person who has the employer's rights at the Foundation can decide - respecting "presumption of innocence" - about the measures taken based on the regulations of the labour law: taking a disciplinary action, terminating the labour contract or suspending the person from his/her duties etc.

The suspension does not imply guilt, it rather protects all parties while an investigation is undertaken.

The decision of the Foundation (e.g. terminating the contract or suspending the person from his/her duties) related to the person accused (if the person is engaged, commissioned or contracted to work with or for Hand in Hand Foundation) needs to be based on thorough investigation and needs to be in line with the related legal regulations.

Any concerns that are raised in good faith are supported by the Foundation, but deliberate false allegations will be investigated and may imply disciplinary actions.

XI. Monitoring and evaluation

The implementation phase of the Safeguarding Policy (SGP) includes the following steps:

1. The Safeguarding Policy and its elements are integrated into the existing systems (strategic planning, recruitment, management, Organisational and Operational Policy, etc.) and processes of the organisation.
2. Preparation of staff, volunteers, apprentices, external experts and everyone who needs to sign the Safeguarding Code of Conduct.
3. Informing cooperating organisations and partners about the principles of the Safeguarding Policy in our joint work.

After the implementation of the safeguarding policies and practices, it is monitored and evaluated on a yearly basis how these are applied in the everyday work of the Foundation and what impact these have on the organisation itself, on our clients (beneficiaries/service users of the Foundation), and on our external environment (partners).

Focus points of the monitoring and evaluation activities:

1. Application of the Safeguarding Policy:
 - The rules of safe recruitment are applied;
 - The Safeguarding Code of Conduct is signed by all persons in its scope;
 - Preparation sessions on the Safeguarding Policy are provided to all relevant persons;
 - The partners of the Foundation are informed about the safeguarding rules and principles in our joint work;

- The rules related to publishing sound recordings, photos and videos, data and privacy protection, communication and online safety are applied;
- The rules of the reporting mechanism and case management are applied, all incidents, allegations of abuse and complaints are recorded and documented;
- The monitoring mechanism is developed and applied.

2. Impact of the Safeguarding Policy:

- Impact on the persons working for the Foundation, and on the Foundation itself
- Impact on the beneficiaries/service users of the Foundation
- Impact on the external environment (partners) of the Foundation

Measuring the impact by questions related to the following areas:

- Impact of the SGP on the everyday work, life or cooperation with the Foundation;
- Participation in the development, implementation, and application of the SGP;
- Knowledge on the SGP;
- Confidence in the application of rules of the SGP;
- Quality of the preparation sessions received;
- Changes since the implementation of the SGP;
- Motivation to report any maltreatments.

The General Director is responsible for the implementation, monitoring, evaluation, and review of the Safeguarding Policy but all persons affected by the Policy (employees, volunteers, apprentices, external experts, beneficiaries/service users, partners etc.) can be involved in these activities.

The monitoring and evaluation activities are done yearly and the Safeguarding Policy is reviewed once in every three years and also amended if needed.

The results of the monitoring and evaluation (internal audit on safeguarding) activities are summarized in an internal audit report which needs to be presented to and approved by the Advisory Board of the Foundation.

Related regulations:

Act XCII of 2007 on the promulgation of The Convention on the Rights of Persons with Disabilities and Optional Protocol

Act XXVI of 1998 on the Rights of People with Disabilities and Equal Opportunities

Directive 2012/29/EU of the European Parliament and of the Council of 25 October 2012 establishing minimum standards on the rights, support and protection of victims of crime, and replacing Council Framework Decision 2001/220/IB

Act XIX of 1998 on Criminal Proceedings

Act V of 2013 on the Civil Code of the Republic of Hungary

Act CLV of 2013 on Supported Decision-making

Act CXXV of 2003 on Equal Treatment and the Promotion of Equal Opportunities

Act C of 2012 on the Criminal Code

Act CXI of 2011 on the Commissioner for Fundamental Rights

Act CLXV of 2013 on Complaints and Public Interest Disclosures

Act III of 1993 on Social Administration and Social Services

Government Decree 14/2012 on the National Centre for Patients' Rights and Documentation

Act CXXXV of 2005 on Crime Victim Support and State Compensation

Government Decree 369/2013 on the official registration and monitoring of social, child-welfare and child protection institutions, services and networks

Act I of 2012 on the Labour Code

2/2013. (I. 31.) National Police Headquarters decree on the tasks of the Police on victim assistance