СВОБОДЕН МЛАДЕЖКИ ЦЕНТЪР
F R E E Y O U T H C E N T R E

Vidin 3700, Bulgaria, 11 Acad.St.Mladenov Str, +359/94601983, /879315160, info@fyc-vidin.org

SAFEGUARDING POLICY OF THE ASSOCIATION "FREE YOUTH CENTRE"

1. ACCEPTANCE

The Association "Free Youth Centre" (hereinafter referred to as the "Association") is committed to creating and maintaining a safe, supportive and inclusive environment for all its members, volunteers, employees and especially for the children and vulnerable adults with whom it works. Our main goal is to ensure their well-being, protection and respect for their rights. This Safeguarding Policy sets out the principles, rules and procedures that the Association follows in order to prevent and respond effectively to all forms of violence, abuse, discrimination, as well as to ensure protection in the event of disasters, accidents, the processing of personal data and other emergency situations.

2. GOALS OF THE SECURITY POLICY

2.1. Creating and maintaining a culture of safety and vigilance in the Association.

2.2. Preventing all forms of violence, abuse (physical, emotional, sexual, financial, neglect), discrimination (on the basis of age, gender, race, ethnic origin, religion, sexual orientation, disability, etc.) and harassment.

2.3. Ensuring clear procedures for reporting, investigating and responding to cases of violence, abuse and discrimination.

2.4. Providing support and protection to children and vulnerable adults who have been affected by violence, abuse or discrimination.

2.5. Ensuring a safe physical environment and adequate protection measures in the event of disasters and accidents.

2.6. Protecting the personal data of all participants in the activities of the Association in accordance with applicable legislation.

2.7. Raising awareness and training of members, volunteers and employees of the Association on the principles and procedures set out in this policy.

2.8. Regularly reviewing and updating the policy with the aim of its continuous improvement.

2.9. Establish clear procedures for dealing with emergencies, accidents, death and the child leaving the centre without warning.

3. CHAPTER ONE: PROTECTION FROM VIOLENCE AND ABUSE

3.1. Principles:

3.1.1. Every child and every vulnerable adult has the right to protection from all forms of violence and abuse.

3.1.2. The interests and well-being of children and vulnerable adults are paramount.

3.1.3. All members, volunteers and employees of the Association are responsible for creating and maintaining a safe environment.

3.1.4. Any suspicion or report of violence or abuse must be taken seriously and dealt with promptly.

3.2. Preventive measures:

3.2.1. All new members, volunteers and employees will undergo a background check procedure, where applicable and in accordance with the law.

3.2.2. Regular training will be provided to members, volunteers and staff on the recognition of signs of violence and abuse, as well as on reporting procedures.

3.2.3. Clear rules of conduct and interaction with children and vulnerable adults will be established, which will be communicated and respected by all.

3.2.4. Information on the rights of children and vulnerable adults and on protection mechanisms will be made available.

3.2.5. Open communication and feedback from children, vulnerable adults and their legal representatives will be encouraged.

3.3. Procedure for reporting suspicions or cases of violence and abuse:

3.3.1. Any member, volunteer or staff member who suspects or witnesses a case of violence or abuse against a child or vulnerable adult is obliged to immediately report this to the President or another member of the Board of Directors of the Association.

3.3.2. The report may be made orally or in writing. In the event of an oral report, the person receiving the report is obliged to document it in writing.

3.3.3. The Association guarantees the confidentiality of the person who filed the report, to the extent possible and not contrary to the need to conduct an investigation and protect the affected person.

3.4. Response to reported cases:

3.4.1. Upon receipt of a report, the designated person immediately takes measures to verify the information.

3.4.2. Depending on the seriousness of the case, the Association may conduct an internal investigation or refer the matter to the competent authorities (police, prosecutor's office, social services).

3.4.3. Immediate measures will be taken to protect the affected child or vulnerable adult.

3.4.4. The Association will assist the competent authorities in conducting the investigation.

3.4.5. If the reported case is confirmed, disciplinary measures will be taken against the perpetrator, in accordance with internal rules and labor legislation.

4. CHAPTER TWO: PROTECTION FROM DISCRIMINATION

4.1. Principles:

4.1.1. The Association does not tolerate any form of discrimination on the grounds of age, gender, race, ethnic origin, religion, sexual orientation, disability or any other characteristic.

4.1.2. All children and vulnerable adults have the right to equal treatment and opportunities to participate in the activities of the Association.

4.1.3. The association strives to create an inclusive environment in which individuality and diversity are respected.

4.2. Preventive measures:

4.2.1. Training for members, volunteers and employees will include topics on preventing discrimination and promoting tolerance.

4.2.2. The Association's communication and materials will use inclusive language that does not discriminate or stigmatize certain groups.

4.2.3. The Association's activities will be planned and conducted in a way that is accessible and inclusive for all.

4.3. Procedure for filing and reviewing complaints about discrimination:

4.3.1. Any person who believes that they have been discriminated against by a member, volunteer or employee of the Association may file a complaint with the President or another member of the Association's Board of Directors.

4.3.2. The complaint may be filed orally or in writing. In the case of an oral submission, the person receiving the complaint is obliged to document it in writing.

4.3.3. The received complaint will be examined objectively and in a timely manner by a designated committee or person in the Association.

4.3.4. Additional opinions and evidence may be collected during the examination process.

4.3.5. The results of the examination of the complaint will be communicated to the submitter and the person against whom the complaint was filed.

4.3.6. In the event that the complaint is upheld, measures will be taken to eliminate the discriminatory behavior and to prevent future similar cases.

5. CHAPTER THREE: COMPLAINTS PROCEDURE (GENERAL)

5.1. This procedure applies to all types of complaints related to the activities of the Association, including, but not limited to, those regarding violence, abuse, discrimination, quality of services, etc.

5.2. Any child, vulnerable adult, their legal representative, member, volunteer or employee of the Association has the right to file a complaint if they believe that their rights have been violated or there is a problem that needs to be resolved.

5.3. Complaints can be filed in the following ways:

5.3.1. In writing: By completing a complaint form (Appendix 1) and submitting it to the chairman or another member of the board of directors of the Association or sending it by post or e-mail.

5.3.2. Orally: By talking to a designated person in the Association, who is obliged to document the complaint in writing.

5.4. When submitting a complaint, it is advisable to provide as much information about the case as possible, including dates, places, names of persons involved and a description of the problem.

5.5. The Association guarantees that each complaint submitted will be registered and reviewed objectively and in a timely manner.

5.6. A designated person or committee will be responsible for reviewing complaints and will inform the submitter of the progress and outcome of the review within a reasonable time.

5.7. Depending on the nature of the complaint, various measures may be taken to resolve it, including conducting conversations, collecting additional information, internal investigation, etc.

5.8. If the submitter of the complaint is not satisfied with the outcome of the review, he has the right to appeal the decision to the Management Board of the Association.

6. CHAPTER FOUR: DISASTER AND ACCIDENT PROTECTION PLAN

6.1. Purpose: Ensuring the safety and protection of all those present on the Association's premises in the event of a disaster (fire, earthquake, flood, etc.) or an accident (power outage, leak, etc.).

6.2. Responsibilities: The security officer appointed by order of the Chairman of the Association is responsible for the development, updating and implementation of the disaster and accident protection plan.

6.3. Preventive measures:

6.3.1. Regular inspection of fire-fighting equipment (fire extinguishers, fire hydrants, etc.) and ensuring its serviceability.

6.3.2. Maintaining free evacuation routes and exits.

6.3.3. Conducting evacuation drills with the participation of all those present at least twice a year.

6.3.4. Providing a first aid kit and trained personnel for first aid.

6.3.5. Installation of clear signs for evacuation routes and assembly points.

6.3.6. Regular inspection of the electrical installation and other potentially dangerous systems.

6.4. Actions in the event of a disaster or accident:

6.4.1. In the event of a disaster or accident, a signal is immediately given (for example, by an alarm or verbal message).

6.4.2. All those present follow the instructions of the responsible persons and evacuate along the designated route to the assembly point.

6.4.3. First aid is provided to the injured, if any.

6.4.4. After the disaster or accident is over, an inspection is carried out for damage and injuries.

6.4.5. The relevant services (fire department, police, emergency services) are reported, if necessary.

7. CHAPTER FIVE: PROTECTION OF PERSONAL DATA

7.1. Principles: The Association processes personal data in accordance with Regulation (EU) 2016/679 (GDPR) and the Personal Data Protection Act.

7.2. Collection and processing of personal data:

7.2.1. Personal data shall be collected only for specific, legitimate purposes and shall be processed in a lawful, transparent and fair manner.

7.2.2. Only personal data necessary for the purpose shall be collected.

7.2.3. Children and vulnerable adults shall provide personal data only with the consent of their legal representatives, except where otherwise provided by law.

7.2.4. All persons whose personal data are processed by the Association have the right to access, rectify, erase, restrict processing, data portability and object to processing.

7.3. Security of personal data:

7.3.1. The Association applies appropriate technical and organizational measures to ensure the security of personal data and to prevent unauthorized access, loss, destruction or damage.

7.3.2. Access to personal data is only available to authorized persons who are trained to process them securely and are bound by a confidentiality clause.

7.3.3. Personal data is stored for a period no longer than is necessary to achieve the purposes for which they were collected.

7.4. Procedure in case of a breach of personal data security:

7.4.1. In the event of a breach of personal data security that may result in a risk to the rights and freedoms of individuals, the Association shall notify the Commission for Personal Data Protection (CPDP) within the period provided for by law.

7.4.2. If the breach poses a high risk to individuals, they shall also be notified of the breach and of the measures taken to remedy it.

8. CHAPTER SIX: EMERGENCY, INCIDENT AND DEATH PROCEDURES

8.1. Emergency procedure (sudden deterioration of health, injury, etc.):

8.1.1. First aid is provided immediately by a medical or other person trained in this matter.

8.1.2. At the same time, an emergency medical team is called (tel. 112)

8.1.3. The legal representatives of the child or vulnerable adult (if applicable) are immediately notified and full information about what happened and the measures taken is provided.

8.1.4. An employee of the Association accompanies the child or vulnerable adult until the arrival of the legal representatives or the medical team, if necessary.

8.1.5. After the emergency is over, the circumstances, the measures taken and their results are documented in detail.

8.2. Procedure in the event of an incident (injury, fracture, other type of trauma):

8.2.1. First aid is provided to the victim.

8.2.2. The need for medical assistance is assessed and, if necessary, an emergency medical team is called.

8.2.3. The legal representatives of the child or vulnerable adult (if applicable) are notified of the incident and their condition.

8.2.4. Detailed documentation of the incident is carried out, including time, place, description of the injury, assistance provided and witnesses (if any).

8.2.5. Measures are taken to prevent similar incidents in the future.

8.3. Procedure in the event of the death of a child or vulnerable adult on the territory of the Association:

8.3.1. An emergency medical team is immediately called to establish death.

8.3.2. The police and prosecutor's offices are immediately notified.

8.3.3. The legal representatives of the deceased shall be notified immediately.

8.3.4. All necessary measures shall be taken to preserve the scene of the incident until the arrival of the investigating authorities.

8.3.5. The Association shall fully cooperate with the investigating authorities in establishing the cause of death.

8.3.6. After the investigation is completed, the Association may conduct an internal analysis of the case with the aim of drawing lessons and improving security measures.

8.3.7. Psychological support shall be offered to the relatives of the deceased.

9. CHAPTER SEVEN: PROCEDURE FOR A CHILD LEAVING THE CENTER WITHOUT WARNING

9.1. Preventive measures:

9.1.1. When a child is admitted to the centre, detailed contact information for his/her legal representatives is collected, as well as information about the persons who are entitled to pick him/her up.

9.1.2. Children are informed about the centre’s rules, including the exit procedure.

9.1.3. Staff is trained to observe children and notice unusual behavior.

9.2. Actions for a child leaving without warning:

9.2.1. As soon as the child is discovered missing, staff takes immediate measures to search for him/her in the building and its immediate vicinity.

9.2.2. The program coordinator or another designated responsible person is immediately notified.

9.2.3. If the child is not found within a short period of time (e.g. 15-20 minutes, depending on age and circumstances), the child's legal representatives and the police (tel. 112) are immediately notified.

9.2.4. All available information about the child (appearance, clothing, last seen, etc.) is provided to the police and full cooperation is provided in the search.

9.2.5. While the search is ongoing, other staff members continue to examine the premises and the surrounding area.

9.2.6. After the child's return, an interview is held with the child and his/her legal representatives to establish the reasons for the departure and to take measures to prevent future similar cases.

9.2.7. The incident is documented in detail.

10. CHAPTER EIGHT: TRAINING AND AWARENESS

10.1. The Association provides regular training for all members, volunteers and employees on this Security Policy and related procedures.

10.2. Training will include topics such as:

10.2.1. Recognizing signs of violence, abuse and discrimination.

10.2.2. Procedures for reporting suspicions or cases of violence, abuse and discrimination.

10.2.3. Rules of conduct and interaction with children and vulnerable adults.

10.2.4. Disaster and accident protection measures and evacuation procedures.

10.2.5. Basic principles of personal data protection.

10.2.6. Procedure for submitting and reviewing complaints.

10.2.7. Procedures for action in the event of an emergency, accident and death.

10.2.8. Procedure for a child leaving the centre without warning.

10.3. New members, volunteers and employees will be made aware of this policy upon joining the Association.

10.4. A copy of this policy will be publicly available on the Association's website and in a prominent place in the premises where activities are held.

10.5. Awareness-raising campaigns will be conducted among children, vulnerable adults and their legal representatives regarding their rights and protection mechanisms.

11. CHAPTER NINE: REVIEW AND UPDATE OF THE POLICY

11.1. This Security Policy will be reviewed and updated periodically, at least once a year, or as necessary (for example, in the event of changes in legislation or the emergence of new risks).

11.2. Responsibility for reviewing and updating the policy lies with the President of the Association.

11.3. The review process may take into account opinions and suggestions from members, volunteers, employees, children, vulnerable adults and their legal representatives.

11.4. All amendments and additions to this policy will be adopted by the Board of Directors and will be promptly communicated to all interested parties.

12. APPENDICES

12.1. Appendix 1: Complaint Form.

12.2. Appendix 2: Rules of Conduct and Interaction with Children and Vulnerable Adults.

This Security Policy was adopted by the Board of Directors of the Free Youth Centre Association on 09.05.2025 and comes into force on 12.05.2025.

Appendix 1: COMPLAINT FORM

Please fill in all fields legibly.

Information about the person submitting the complaint:

First name and last name:

Quality (child, vulnerable adult, legal representative, member, volunteer, employee):

Date of birth (if applicable):

Address:

Telephone number:

Email:

Information about the person/persons against whom the complaint is being filed (if known):

First name and last name:

Relationship to the Association:

Description of the complaint:

Date and time of the incident (if applicable):

Location of the incident (if applicable):

Detailed description of what happened:

Evidence attached (if any):

(For example, photographs, written documents, witness statements, etc.)

Proposed measures to resolve the problem:

Date of filing the complaint:

Signature of the submitter:

Appendix 2: RULES OF CONDUCT AND INTERACTION WITH CHILDREN AND VULNERABLES ADULTS

These rules set out the standards for the conduct and interaction of all members, volunteers and employees of the Free Youth Centre Association (hereinafter referred to as the "Association") with children (persons under 18 years of age) and vulnerable adults. The purpose of these rules is to create and maintain a safe, respectful and inclusive environment that minimises the risk of violence, abuse and discrimination.

1. GENERAL PRINCIPLES:

1.1. Always put the interests and well-being of children and vulnerable adults first.

1.2. Treat everyone with respect, dignity and understanding, regardless of their age, gender, race, ethnic origin, religion, sexual orientation, disability or other characteristics.

1.3. Comply with all Association policies and procedures, especially those relating to safety and security.

1.4. Be professional and maintain appropriate boundaries in your relationships.

1.5. Avoid any behaviour that could be interpreted as violence, abuse, discrimination or harassment.

1.6. Be observant and report immediately any suspicion or incident of violence, abuse or discrimination in accordance with Association procedures.

2. PHYSICAL CONTACT RULES:

2.1. Physical contact with children and vulnerable adults should be kept to a minimum and always appropriate to the situation and the age/condition of the person.

2.2. Avoid any physical contact that could be perceived as sexual, threatening or uncomfortable.

2.3. Hugs or other forms of comforting physical contact should be brief, well-intentioned and only when appropriate and desired (as far as it is possible to assess the wishes of a vulnerable adult).

2.4. When providing assistance that requires physical contact (e.g. moving), explain in advance what you are going to do and ask for consent where possible.

2.5. Never leave a child alone in a closed room unless absolutely necessary and in accordance with established procedures (e.g. providing first aid). In such cases, the door should be left open if safe to do so.

3. COMMUNICATION RULES:

3.1. Communicate openly, honestly and in a way that is easy for children and vulnerable adults to understand.

3.2. Use appropriate language that is not offensive, threatening, discriminatory or sexual.

3.3. Listen carefully and respect the views of children and vulnerable adults.

3.4. Do not ask leading questions or press for information.

3.5. Avoid personal questions that are not related to the Association's activities and could be perceived as an invasion of personal space.

3.6. Communicate with parents/legal guardians of children or with caregivers of vulnerable adults in an appropriate and established manner.

3.7. Any communication with children online should be transparent and, where possible, in the presence or with the knowledge of another staff member or volunteer. Avoid personal online contact with children.

4. PRIVACY RULES:

4.1. Respect the right to privacy and confidentiality of children and vulnerable adults.

4.2. Do not disclose personal information about them to third parties without their consent or their legal representatives, except in cases provided for by law or the Association's policies (for example, when reporting violence or abuse).

4.3. Store all personal data and documents securely, in accordance with the Association's Privacy Policy.

4.4. Discussions about children and vulnerable adults should only be held in appropriate places and with persons who have the right to be informed.

5. RULES FOR TEAMWORK AND OBSERVATION:

5.1. Work in a team whenever possible, especially when working with children and vulnerable adults.

5.2. Maintain open communication with colleagues about observations and concerns.

5.3. Be aware of your roles and responsibilities.

5.4. When in doubt or uncertain about a situation or behavior, seek advice from a more experienced colleague or manager.

5.5. Do not ignore signals or concerns expressed by children, vulnerable adults or colleagues.

6. UNACCEPTABLE BEHAVIOR:

The following types of behavior are absolutely unacceptable and may result in disciplinary action, including termination of membership, volunteering or employment:

6.1. Any form of violence (physical, emotional, sexual, financial, neglect) or abuse.

6.2. Discrimination or harassment on any grounds.

6.3. Inappropriate physical contact.

6.4. Offensive, threatening or sexual language or behavior.

6.5. Disregarding the safety and well-being needs of children and vulnerable adults.

6.6. Breach of confidentiality.

6.7. Abuse of power or trust.

6.8. Failure to report suspicions or incidents of violence, abuse or discrimination.

6.9. Actions that put the safety of children and vulnerable adults at risk.

7. TRAINING AND AWARENESS:

7.1. All members, volunteers and employees are required to familiarize themselves with and comply with these rules.

7.2. The Association will provide regular training on these rules and related policies and procedures.

7.3. In case of any questions or need for clarification, please contact the designated responsible person in the Association.

These rules are an important part of the commitment of the Association "Free Youth Centre" to provide a safe and supportive environment for everyone. Their compliance is mandatory for everyone who works or participates in the activities of the Association.