

FARA’s Child Safeguarding Policy

POLICY STATEMENT

The Friedreich’s Ataxia Research Alliance (FARA) is committed to protecting the [Rights of the Children in accordance to the UNCRC \(United Nations Convention on Rights of the Child\)](#) and all applicable federal, state and local laws. FARA recognizes that stakeholders of the organization will have contact with children and vulnerable adults as part of FARA’s critical mission to treat and cure FA. FARA, therefore, executes this Child Safeguarding Policy to ensure the highest standard of care between our stakeholders and children and vulnerable adults. Hereafter, the use of the word “child” to include vulnerable adults is not intended to disparage or diminish the adult status of these individuals but is solely used to simplify the language and writing of the policy.

SCOPE OF THE POLICY

FARA is committed to protecting the safety and well-being of children who participate in FARA-related programs by promoting child safeguarding awareness and prevention of risks that may come to them across all programming, operations, campaigns, and activities. All FARA stakeholders are expected to conduct themselves appropriately with children who participate in FARA-related programs and report any incidents of concern. FARA’s Child Safeguarding Policy will guide recruitment, hiring, training, programming, and the reporting and response to any violations.

DEFINITIONS

Child

For this policy and related procedures, a child is anyone under the age of 18 years, irrespective of the age of majority in the country in which the child lives OR a vulnerable adult, 18 or above, who, by reason of disability, age or illness, the context they are in or as a result of social and other inequalities, is or may be unable to take care of or to protect oneself against significant harm or exploitation.

Child Abuse

All forms of physical and/or emotional ill treatment, sexual abuse, neglect or exploitation, resulting 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.

Child Safeguarding

A broad term to describe policies, standards, guidelines and procedures adopted to protect children from both intentional and unintentional harm from a FARA stakeholder. It involves

collective and individual responsibility and preventative actions by all FARA representatives to foster an environment which mitigates the risk of, or actual harm to, children while participating in FARA related events. This includes management of children's personal data.

Emotional Abuse

Harm to a child's emotional, intellectual, mental or psychological development. This may occur as an isolated event or on an ongoing basis. Emotional abuse includes but is not limited to any humiliating or degrading treatment (e.g., bad name-calling; threats; yelling, screaming, or cursing at; teasing; constant criticism; belittling; persistent shaming; etc.), failure to meet a child's emotional needs, and rejecting, ignoring, terrorizing, isolating or inappropriately confining a child.

Grooming

The process in which an adult builds a relationship with a child or the child's caretaker to gain the child's or the caretaker's trust for the purposes of sexually abusing and/or exploiting the child. Grooming typically occurs in phases, and it can happen online or face to face, by a stranger or by someone the child or caretaker knows. Since it is a gradual process, it can sometimes be difficult to detect. Here are a few indicators that an adult may be grooming a child or his/her caretaker:

- Favoring the child over others
- Providing the child with rewards or privileges
- Isolating the child from others
- Expressing interest in a child who is particularly vulnerable or in need of support (e.g., previous abuse of the child by another)
- Befriending the parents or caretakers who are responsible to protect the child
- Providing the child with alcohol or drugs
- Building intimacy (i.e., having inside jokes or telling the child that nobody understands him/her like the groomer does)
- Threatening, blackmailing, intimidating, or scaring a child by saying the groomer will do something to the child's family or friends.

Neglect

The failure to meet a child's basic physical and/or psychological needs either deliberately or through negligence. Neglect includes but is not limited to failing to provide adequate food, sufficient or seasonally-appropriate clothing and/or shelter; failing to prevent harm; failing to ensure adequate supervision; failing to provide access to appropriate medical care or treatment or providing inappropriate medical treatment (e.g., administering medication when not authorized); or failing to provide a safe physical environment (e.g., exposure to violence, unsafe programming location, unsafe sleeping practices, releasing a child to an unauthorized adult, access to weapons or harmful objects, etc.).

Physical Abuse

Non-accidental use of physical force that inadvertently or deliberately causes a risk of or actual injury or suffering to a child. Physical force includes but is not limited to hitting, shaking, kicking, pinching, pushing/pulling, grabbing, burning, torture, and other physical acts. Physical injury or suffering may include but is not limited to bruises, marks, soft tissue swelling, hematomas, fractures, sprains, dislocation, burns, damage to organs, death, permanent disfigurement, and any other non-trivial injury.

Representative

Employees, interns, and Board Directors.

Sexual Abuse

Sexual abuse is inappropriate sexual behavior with a child. It includes fondling a child's genitals, making the child fondle the adult's genitals, intercourse, incest, rape, sodomy, exhibitionism and sexual exploitation. Sexual Abuse also includes online behavior involving showing the pornographic material, taking photos of the child in the nude, storing or producing child pornographic material.

Stakeholder

An individual or organization who works with children on FARA's behalf, or who has access to sensitive information about children in FARA's programs.

Vulnerable Adults

An adult, 18 or above, who, by reason of disability, age or illness, the context they are in or as a result of social and other inequalities, is or may be unable to take care of or to protect oneself against significant harm or exploitation.

PROCEDURES

FARA will follow the following procedures:

1. **Recruitment/Screening:** Advertisements for job vacancies will include a safeguarding statement. The application forms of the applicants need to contain a minimum of two references. FARA employs robust background screening and identification verification, subject to local jurisdictions, on each new hire. All employees will be required to report to FARA's Director of Finance Administration / HR any criminal convictions or ongoing criminal prosecutions against them.

2. Employment: FARA's Child Safeguarding Policy will be given to employees annually and upon review, all employees will be asked to certify the same. As part of that declaration, they will need to state that there is no known reason or event that would render them unsuitable for the position they hold and that they have no new criminal activity. Violations of this policy will serve as grounds for dismissal, suspension or transfer to other duties.

3. Non-employed stakeholders: All stakeholders identified as coming into contact with or working with children on FARA's behalf will receive FARA's Child Safeguarding Policy and attached Code of Conduct prior to engagement. All stakeholders will be expected to follow accordingly.

4. Training: This policy will be a mandatory part of training for all staff. Training will include a review of the FARA Child Safeguarding Policy, guidance on promoting a culture where children's rights are observed, how to identify potential harm to children, and how to report allegations and suspicions of abuse. All supervisors within FARA are responsible for understanding and communicating with their staff the functional responsibilities they hold to ensure that programs and operations are safe for children, mitigate foreseeable risks, and execute FARA's Child Safeguarding Policy across all contexts.

5. Code of Conduct: FARA representatives will be asked to read through FARA's Child Safeguarding Policy and sign the attached Code of Conduct annually. FARA's Code of Conduct is a binding commitment to following all safeguarding policies and procedures, both in professional and personal interactions with children. Anyone found to be in breach of the policy or code will be subject to disciplinary action, up to and including dismissal or termination of employment or other arrangement with FARA. All representatives must also be mindful that their behavior should respect the spirit of this code in their personal life and should not behave in a way that would undermine the reputation of FARA or place a child at risk. A signed copy will be maintained in the individual's file.

6. Communication Protocols: FARA is committed to child safeguarding in its publicity and external communications to preserve the child's dignity and protect each family's privacy. Engagement with children and their caretakers for the purposes of research, marketing media/communications and advocacy must be done with assent and informed consent. FARA will publish this policy on its website and electronic copies will be made available and accessible to all stakeholders.

7. Risk Assessments and Inclusivity: All FARA programs and activities will integrate the principals of FARA's Child Safeguarding Policy so that they are designed and developed in ways that promote the protection of children. Risk assessments must be performed as part of the planning for all activities involving child participation. All activities must promote safety, inclusion and equitable participation of all children across all of their intersecting identities, including but not limited to disability, racial & ethnic heritage, national status, cultural affiliations, religious beliefs, languages, gender or gender association, LGBTQ+ identity and/or medical/physical conditions.

8. Responding and Reporting: Any complaints made by the child against a FARA stakeholder, whether within the organization or outside, will be taken seriously. All complaints including anonymous complaints against a FARA stakeholder will be handled with strict confidentiality and investigated immediately. FARA's Director of Finance Administration / HR may make recommendations pending the inquiry regarding any immediate action that needs to be taken regarding the FARA stakeholder to protect the child.

The following steps should be taken by all FARA stakeholders to report a child safeguarding concern:

- Responding to a Child Safeguarding Emergency – where a child has been seriously hurt or is in imminent danger of being harmed
 1. Call local emergency services
 2. Inform the CEO or Director of Finance Administration / HR immediately.
 3. Complete FARA's Incident Form, copy attached, with as much information as possible and send to FARA's CEO and FARA's Director of Finance Administration / HR promptly but no later than 24 hours of becoming aware of the incident.
 4. FARA's CEO is responsible for contacting and coordinating FARA's interactions with governmental agencies, involving the reporter when necessary, and for documenting all actions to resolve the issue through conclusion in a timely manner.

- Responding to a Non-Emergency Child Safeguarding Concern
 1. Inform FARA's CEO or FARA's Director of Finance Administration / HR within 24 hours.
 2. Complete FARA's Incident Form, copy attached, with as much information as possible and send to FARA's CEO and FARA's Director of Finance Administration / HR within 48 hours of becoming aware of the incident.
 3. FARA's CEO is responsible for contacting and coordinating FARA's interactions with governmental agencies, involving the reporter when necessary, and documenting all actions to resolve the issue through conclusion in a timely manner.

9. Failure to Report: Appropriate action will be taken against FARA representatives who fails to report a violation that come to their notice including possible removal from his/her position.

10. Dismissal of Complaint: In a case where a good faith complaint is found to be unsubstantiated, no action will be taken against the alleged violator or the individual who submitted FARA's incident report.

11. Oversight: FARA's Director of Finance Administration / HR, in consultation with FARA's CEO and General Counsel, will be responsible for:

- policy review, policy updates, staff training and coordination of safeguarding resources
- assisting the CEO in all matters related to this policy
- recruiting tasks, screenings and contracting in accordance with this policy

Any questions regarding this policy, related procedures and forms should be directed to FARA's Director Finance Administration / HR.

FARA'S CODE OF CONDUCT

- I shall treat every child with dignity and respect regardless of differences of ethnicity, ability, gender, class or economic circumstances.
- I shall not engage in any act of child abuse, physical or sexual; pornography, or commit any act in violation of applicable federal, state or local laws, whether engaging in FARA-related activities or during personal time.
- I shall not commit any form of psychological abuse, such as verbally or physically intimidating, threatening, humiliating, or coercing a child.
- I shall not hug, caress, fondle the child or touch the child in a way that makes the child uncomfortable.
- I shall not make any physical gestures in a manner that is found to be sexually provocative.
- I shall not use any computers, mobile phones, video cameras, cameras or social media to exploit or harass children or access child exploitation material through any medium.
- I shall not be alone with a child in a private place that cannot be readily seen by other responsible adults. Always keep doors open and be visible to others when with children. (This does not apply to parents with their own children or responsible caregivers appointed by the parent.) Whenever possible, ensure that another adult is present when working in proximity of children.
- I shall not use physical punishment for disciplining children and youth. This prohibition includes slapping, hitting, or any other physical force during program activities.
- I shall include parents or guardians on all communications with children.
- I shall ensure that all engagement with children related to FARA research programs has been approved by the appropriate regulatory bodies where applicable and obtain and document assent and informed consent prior to a child's participation.
- I shall store, use and share children's demographic and medical/research data in accordance with applicable federal, state and local privacy laws and appropriate consent.
- I shall report any suspected violations of this policy immediately to FARA's CEO or FARA's Director of Finance Administration / HR.

Certification

I, _____, have read and understood FARA’s Child Safeguarding Policy and FARA’s Code of Conduct. I acknowledge that FARA wants to create a child safe environment and declare that there is no known reason or event that would render me unsuitable to work with or come into contact with children. I also declare that I have no criminal convictions or ongoing criminal prosecutions against me at this time. Furthermore, I acknowledge that FARA states expectations of me in my service and/or association at FARA-related activities as it relates to children. By signing herein, I accept and certify to abide by both FARA’s Child Safekeeping Policy and FARA’s Code of Conduct.

NAME: _____

JOB TITLE/POSITION: _____

SIGNATURE: _____

DATE: _____