

Name of organization	Transkulturalna Psihosocijalna Obrazovna - TPO Fondacija Transcultural Psychosocial Educational - TPO Foundation
Brief Description	TPO Foundation mission is to advocate, promote and protect human rights, democracy, rule of law, peacebuilding, education, gender equality, youth leadership and women empowerment
Policy Title	Child Safeguarding Policy – CSP
Author	TPO Foundation Program Director
Approver	TPO Steering Committee
Purpose and Description	This Policy and related procedures describe TPO Foundation’s commitment to Child Safeguarding (CS) including respect of fundamental values and principles of human rights and children rights and protection of dignity and integrity of children we work with. The purpose of the Policy is to ensure that TPO Foundation is safe for children by promoting awareness and mitigating the risk of or actual harm that may come to children by employees, representatives, programming or operations.
Delivered to	Partners, consultants, associates, vendors, volunteers, and other individuals, organizations or institutions with whom we work (collectively named partners).
Effective date	10/1/2016
Revision date	12/2/2020

TERMINOLOGY AND DEFINITIONS

- A. **Child or Children:** Anyone under 18 years of age.
- B. **Child Abuse:** Any action which individuals, institutions or purposes do or fail to do which directly or indirectly harms child or children or damages their prospect of safe and healthy development into adulthood. The main categories of Child Abuse are:
- **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, female genital mutilation, 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
 - **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/cursing at, teasing, constant criticism, belittling, persistent shaming, etc.), failure to meet a child's emotional needs, and rejecting, ignoring, terrorizing, isolating or confining a child
 - **Neglect/Negligent Treatment:** 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 ensure 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, failing to child-proof a space that children will occupy, etc.).
 - **Sexual Exploitation & Abuse:** All forms of sexual violence and coercion, sexual solicitation, manipulation or trickery including incest, early and forced marriage, rape, involvement in or exposure to indecent images/video (aka pornography), sexual slavery/trafficking, and statutory rape. Sexual abuse may include but is not limited to indecent touching or exposure, explicit sexual language towards or about a child and grooming. Sexual abuse does not always involve touching. Sexual Exploitation is any

- actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes including but not limited to profiting monetarily, socially or politically from the sexual exploitation of another. Be aware that technology is a tool sometimes used to sexually exploit a child. The sexual exploitation and abuse of children under the age of 18 is child abuse and a policy violation. It may also constitute a criminal offense, depending upon the age of consent, local laws and customs.
- **Grooming** is 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.
 - **Exploitation:** The actual or attempted abuse of a position of vulnerability, power differential, or trust for the benefit of the individual leveraging their position, power, privilege, or wealth (through enticement, manipulation, coercion or trickery) to engage child in labor, domestic servitude, forced criminality, soldiering or organ harvesting. Typically, the person(s) exploiting a child does so in order to profit monetarily, socially, or politically. It can happen to one or a group of children, in the community of origin, outside of the community, or internationally. The exploitation of a child may include but is not limited to:
 - domestic servitude (e.g., cleaning, childcare, cooking, etc.)
 - forced labor (commonly in factories or agriculture)
 - forced criminal activities such as pickpocketing, begging, transporting drugs, manufacturing drugs, selling pirated merchandise
 - used for benefit fraud

- forced to become a child soldiers or join a gang
- C. **Child Data:** Paper or electronic information containing personal information for our program purposes.
- D. **Child Protection:** Child protection is making the environment safe for children. We aim to protect children from all forms of abuse and exploitation in all environments we work, specifically including vulnerable communities, domestically in Bosnia and Herzegovina and regional countries and promote children rights and protections worldly.
- E. **Child Safeguarding:** The Policy containing definitions, terminologies, procedures and practices that we employ to ensure that TPO Foundation is a child safe organization. Child Safeguarding is obliging every person involved in work of TPO Foundation to individual and collective responsibility and preventive actions to ensure that all children are protected from deliberate or unintentional acts that lead to the risk of or actual harm by TPO Foundation staff, representatives, associates or partners, who come into contact with children or impact them through our program activities.
- F. **Child Welfare:** Child Welfare is making the community safe for children. It includes claims of child abuse that happen external to TPO Foundation and/or that are required by law or local norms to be reported to local authorities, which may include familial, communal or institutional child abuse allegations.
- G. **Guest:** Any non-employee, non-representative invited into TPO Foundation to visit programs or partake in an event or activity sponsored by TPO Foundation.
- H. **Public Communications:** Dialogue in the public sphere in order to deliver a message to a specific audience. Speaking events, conferences, book promotions, TV, radio or newspaper editorials, email and Social Media are a few forms of public communication.
- I. **Representatives:** Employees, volunteers, interns, consultants, Board members, Partners and others who work with children on TPO Foundation's behalf, visit TPO Foundation's programs
- J. **Social Media:** Forms of electronic communication/content used to share information, comments, messages, images, video and other content via a TPO Foundation Social Network

TPO Foundation has 0% of tolerance for Child Abuse!

COMMITMENTS

TPO Foundation is committed to conducting its programs in a manner that is safe for the children it serves and to helping protect the children with whom TPO Foundation is in contact. All TPO Foundation representatives are explicitly prohibited from engaging in any activity that may result in any kind of Child Abuse. TPO Foundation's policy to create and proactively maintain an environment that aims to prevent and deter any actions and omissions, whether deliberate or inadvertent, that place children at the risk of any kind of Child Abuse. All TPO Foundation Representatives are expected to conduct themselves in a manner consistent with this commitment and obligation. Any violations of this policy will be treated as a serious infraction and will result in disciplinary action being taken, up to and including termination and any other available legal remedy.

TPO Foundation through its programs aims to promote:

- **Prevention of Child Abuse:** Striving, through awareness, good practice and training, to minimize the risks to children and take positive steps to help protect children who are the subject of any concerns.
- **Reporting of Child Abuse:** Ensuring that all Representatives know the steps to take and whom to contact when concerns arise regarding the safeguarding of children.
- **Responding to Child Abuse:** Engaging in action that supports and protects children when concerns arise regarding their well-being; supporting those who raise such concerns; monitoring and taking appropriate corrective action to prevent the recurrence of such activity.
- **Meetings to Promote Awareness of Child Safeguarding Obligations:** Ensuring that all Representatives are adequately familiar and supported in preventing, reporting and responding to safeguarding concerns; and ensuring that all Representatives are notified of and made aware of the expectation to comply with this Policy.

COMPLIANCE WITH APPLICABLE NATIONAL AND INTERNATIONAL LAWS AND REGULATIONS

It is TPO Foundation's policy to ensure compliance with host country and local child welfare and protection legislation, or international standards, whichever affords greater protection. The requirements of this Child Safeguarding Policy are in addition to any other applicable legal requirements, including but not limited to donor requirements. The main international and national legal documents include:

International Documents

- Convention on the Rights of the Child and Optional Protocols to the Convention on the Prohibition of Participation children in armed conflicts and the sale of children, child prostitution and child pornography. (Part of the Constitutional Framework of BiH)

Bosnia and Herzegovina (national level):

- BiH Action Plan for Children of BiH 2011-2014
- Strategy for combating violence against children 2012-2015.
BiH Criminal Code of BiH (Official Gazette of BiH, No. 37/03)
- Law on Offenses of BiH (Official Gazette of BiH, No. 20/04)
- Law on Criminal Procedure of BiH (BiH Official Gazette, No. 36/03)
- Law on Prohibition of Discrimination of BiH (Official Gazette of BiH, No. 59/09)
- Law on Gender Equality in BiH (Official Gazette of BiH, Nos. 16/03, 102/09 and 32/10)
- Framework policy of early growth and development of children in BiH (Official Gazette BiH , No. 36/12)

PROCEDURES IN REGARD TO SEXUAL ACTIVITY WITH CHILD

It is TPO Foundation’s policy that any individual under the age of 18 is a child and is “underage”. An underage child cannot legally give informed consent to sexual activity. Sexual activity with a Child with or without their consent will be treated as a serious infraction and will result in disciplinary action being taken, including termination, and the pursuit of any other available legal remedy.

ACCOUNTABILITY OF MANAGEMENT

TPO Foundation Management is committed to taking all appropriate corrective actions. Disciplinary, contract termination, legal or other applicable actions in response to any violation of the Child Safeguarding Policy will be taken against any individual who has committed a Child Safeguarding violation and/or anyone who knew of such a violation and failed to act or report.

CHILD SAFEGUARDING COMMITTEE - CSC

TPO Foundation Child Safeguarding Committee (CSC), is consisted of the Program Director, a coordinator and the two representatives from the cantonal ministry of education who will continuously monitor and evaluate the implementation of Safeguarding policy during the implementation of project activities and will evaluate findings of violations to the Child Safeguarding Policy to identify and address gaps and/or weaknesses in applicable policies,

procedures and protocols. The evaluations will be processed and analyzed, and will be an integral part of the final narrative report on project activities.

CONFIDENTIALITY IN CHILD SAFEGUARDING MATTERS

TPO Foundation has a duty to manage sensitive information in a manner that is respectful, professional and that complies with the applicable law. Staff must keep all information about any suspected or reported incidents strictly confidential, and must divulge only that information to the TPO Foundation Management and TPO Child Safeguarding Committee.

PROCEDURES

Prevention of Child Safeguarding Incidents

TPO Foundation guidance for the prevention of safeguarding violations include:

A. Mitigating Child Safeguarding Risks in Project Planning and Implementation

- Risk Assessments will be conducted for all programming and activities involving children or those having a direct impact on children. All programs from design until exit will be evaluated to ensure it meets the standards for safeguarding children. In addition to programming, other activities carried out by TPO Foundation, contractors or partners may include but are not limited to research, advocacy, media campaigns and events (involving child participation).
- Where possible and practical, the “Two-Adult Rule,” wherein two or more adults, members of Child Safeguarding Committee supervise all activities where children are involved and are present at all times, shall be followed.¹

Representatives must never:

- act in ways that may be abusive or place Children at risk of abuse;
- hit, physically assault or physically abuse Children or threaten to do so;
- engage in behaviors that are physically inappropriate or sexually provocative;
- engage in sexual activity or have a sexual relationship with anyone under the age of 18 years irrespective of the age of majority/consent or local custom;
- stay alone overnight with one or more Children benefitting from TPO Foundation programs who are not part of their family, whether in their house, project premises or elsewhere;

¹ Two-Adult Rule must be used because it: (1) significantly reduces the risk of an incident of abuse; (2) protects against false accusations; (3) reduces liability and a possible claim of negligence; and (4) offers additional help if there is an accident or emergency

- have a Child beneficiary, who is not a part of their family, stay overnight at their home;
- sleep in the same bed as a Child beneficiary or sleep in the same room as a Child beneficiary, who is not a part of their family;
- invite Children to stay overnight in a compound, hotel or other accommodations, domestically or internationally, with a non-relative TPO Foundation representative
- exchange personal contact information or ask for Children's personal information;
- develop relationships with Children which could in any way be deemed exploitative or abusive;
- use language, make suggestions or offer advice to Children which is inappropriate, offensive or abusive;
- do things for Child beneficiaries of a personal nature that they can do themselves (e.g., toileting, dressing, feeding, washing, etc.);
- condone or participate in behavior of Children which is unsafe or illegal;
- act in ways that shame, humiliate, belittle or degrade Children, or otherwise perpetrate any form of emotional abuse;
- discriminate against, show unfair preferential or differential treatment towards particular Child beneficiaries to the exclusion of others;
- ask to meet Children away from other adults or spend excessive time alone with Child beneficiaries away from others in a manner which could be interpreted as inappropriate; and/or
- expose Child beneficiaries to inappropriate images, films, music and websites including mature content, indecent images (pornography) and violence.

This is not an exhaustive or exclusive list. Representatives must, at all times, avoid actions that could be construed to constitute poor practice or potentially abusive behavior. Representatives must never place themselves in a position where they are made vulnerable to allegations of misconduct.

B. Safe Recruitment

TPO Foundation will only recruit representatives who are suited to work with children. Strict child safe recruitment practices apply to all candidates, which include but are not limited to confirming the candidate's identity, obtaining references, conducting interviews, criminal and sexual offender database. Partners, donors, visitors, who do not work directly with children but sign contract with TPO Foundation will be given the Child Safeguarding Policy with obligation to respect the fundamental policy of the Foundation they work with. Journalists working to promote

and make visible the programs we implement are informed about Child Safeguarding policy, risk assessment and active supervision of their work.

C. Child Safeguarding Verbal Briefing

All TPO program visitors, potential associates, future partners or collaborators will receive a verbal briefing on Child Safeguarding, for which the visit lead will be responsible. **(See Annex I – Child Safeguarding Verbal Briefing Script)**

D. Active Supervision of representatives and visitors

All representatives and visitors are supervised by TPO Foundation staff when working directly with Children to ensure their behavior complies with the Policy. Before their contact with Children, they are introduced with full version of Policy. The same procedure is applicable to all individuals, institutions, collaborators, partners and associates who will be working with Children within TPO Foundation program.

E. Child Safeguarding Article in all Partner Contracts

Child Safeguarding special formed Article is added to all contracts of TPO Foundation for all partners, representatives, associates and any other individual or organization/institution with whom we will work on program activities. All partners are obliged to respect the Policy by signing the contract. **(See Annex II - Child Safeguarding Article in all TPO-Partner Contracts)**

F. Site Visitors and Child Safeguarding Policy

All site visitors will be introduced with Child Safeguarding Policy in full version in English and Bosnian languages in updated version. The Policy is available at TPO Foundation website.

REPORTING CHILD SAFEGUARDING INCIDENTS

All Representatives shall know the steps to take and whom to contact when concerns arise regarding the safety of children. Failure to report a concern, reasonable suspicion or knowledge of misconduct in accordance with this Policy will be treated as a serious infraction and may result in disciplinary action.

Institutional Reporting

The Institutional reporters include primary Ministries of education and schools who are the main TPO Foundation partners on programs. The TPO Foundation programs that are organized inside the primary and secondary schools meet the requirements and obedience of the TPO Foundation

Child Safeguarding Policy and National laws and regulations imposed to the schools by the Ministries of education. Two policies are not opposed to each other and school staff is familiar with both policies and procedures. In case of any Child Safeguarding incidents, the responsible persons who first take the necessary actions are:

- Teacher (TPO representative or the responsible teacher from the school or any other associate having the first direct contact with Children)
- Pedagogue
- Psychologist
- Social Worker
- School Management

Child Safeguarding Incident Report

All reports of suspected or known violations to this Policy must be submitted to the School Management and TPO Foundation Management within 24-hours of occurrence or upon learning of the violation. All Representatives covered by this Policy need to fulfill the Child Safeguarding Incident Report. The report is available online on TPO Foundation web site, in printed or electronic version through e-mail. **(See Annex III – Application form for disclaimer of Child Safeguarding Policy)**

Contact Information

A suspected or known Child Safeguarding violation can be reported anonymously or in name via e-mail: tpo@tpofond.org or via telephone number: 033 663 350. In case of immediate need for intervention of local authorities, we urge all to immediately call the local authorities: Police: 122; Ambulance: 124, Fire Department: 123. The reporters will also immediately contact the parents of Children involved directly in incident. After the action of local authorities, the reporters will afterwards fulfill the Child Safeguarding Report Incident to the TPO Foundation Management.

Management and Child Safeguarding Committee Follow-up of Child Safeguarding Allegations

Any report of Child Safeguarding incident that is received by TPO Foundation will urge meeting of TPO Management and Child Safeguarding Committee for further steps that are necessary to take. In correlation with school management, local authorities and other parties of the incident, the record will be made with precise action plan for resolving the incident. All conversations pertaining to the investigation will be properly documented. A final report will be completed for all incidents that have been followed-up and uploaded to Child Safeguarding Committee data and report. Reports shall include the findings and Child Safeguarding recommendations (e.g., processes, procedures and/or personnel actions) to determine corrective or personnel actions.

RAISING AWARENESS OF CHILD SAFEGUARDING OBLIGATIONS

All TPO Foundation staff must join the meetings and internal activities for raising awareness of Child Safeguarding Obligations. The activities are planned and executed by the Child Safeguarding Committee once a year, with possibility for more meetings if necessary. Main points of the Child Safeguarding Obligations discussed at the gatherings include:

- Introducing with Child Safeguarding Policy
- Discussing the refreshed and updated version and added annexes to the existing Policy
- Introduction with new programs and resuming sensitivity of the program activities related to direct work with Children
- Brainstorming about Child rights promotion as one of the ways for violence prevention
- Preparing TPO staff for cases of Child Safeguarding incidents
- Prepare monitoring plan for Safeguarding Policy
- Discussing the reports of Child Safeguarding Committee and introducing the staff with new decisions, etc.

Communications Materials (interviews, photography and filming)

Any communications materials that include images of or information about children are subject to the national law and TPO Foundation is obliged to take actions according to the law and behave accordingly. No material that include images of or information about children can be taken without permission of the parents and teachers if the event is organized in schools. Before any action that includes collecting material about children, formal Confirmation Letter will be sent to all parents of potential children that shall be included in related activities. The Confirmation Letter includes foundation brief description, description of planned activities, the aim of activity and usage of material created of such activity, date and place. Signed Confirmation Letters by parents are acceptance to work with children in related activities, unsigned or refuse of letter receive is understood as rejection and their children will not be taking place in mentioned activities.

Research and Monitoring, Evaluation, Assessment & Learning (MEAL)

All research and MEAL activities require an ethical review in accordance with the law, donor requirements and/or ethical standards. The review process will ensure compliance with this Policy.

Child Data

All Representatives are expected to deliver child data to TPO Foundation collected during their program activities engagement and no child data collected by the Representatives can be used for any matter without permission of TPO Foundation. TPO Foundations will use Child Data in accordance to national laws and regulations on identity protection and child rights.

Children with Different Abilities or Disabilities

Children with different abilities or disabilities are at an increased risk of abuse. Where children with special needs benefit from our programs, we must make all necessary accommodations to ensure their inclusion and safety. To promote the best delivery of services to children with different abilities or disabilities, please:

- Consult with the child to better understand his/her needs.
- Consult with parents/caretakers to better understand the needs of the child, as well as any limitations to activities offered.
- Be aware of attitudes that the child, his/her family, the community and other children in the program/activity may have towards the child with special needs and encourage inclusion and participation to the full extent possible.

Programs and activities shall be designed to be inclusive and mindful of children with unique or special needs. For children whose different abilities or disabilities may not be visible or patent, staff shall, in accordance to its abilities, make reasonable efforts to adjust program activities to promote inclusion and offer alternative activities in which all children can join. The validity of a special need must never be questioned or dismissed.

Child Participation and Inclusion

To promote the safety, inclusion and equitable participation of all children irrespective of their abilities, racial heritage, tribal affiliations, religious beliefs, languages, gender or gender association, LGBTI+ identity and/or medical/physical conditions, all programs and activities shall be assessed to ensure consideration of such factors from its inception through delivery. The aforementioned factors are not an exhaustive list.

COURSE REQUIRMENTS

Internal Course	Frequency
Child Safeguarding Policy course	Upon induction and then once a year

MONITORING MECHANISMS

What do we monitor?	Data source	Action Owner	Escalation levels	Frequency
All program activities	Project coordinator and Child Safeguarding Committee	Child Safeguarding Committee	President of Child Safeguarding Committee and Director who has oversight of the policy and procedures	During the year

EXCEPTIONAL APPROVAL PROCEDURE

Procedure/ Action	Action owner
Exceptions to this policy requires written approval by the Committee President & TPO Director	Person seeking exception to policy
File and retain exception approval	Director

VERSION CONTROL

Version date	Revisions made
February 12, 2020	Revision of the existing Child Safeguarding Policy
January 10, 2016	Updated Format

ANNEX I

CHILD SAFEGUARDING VERBAL BRIEFING SCRIPT

No individual is allowed to visit with children if his/her presentation is indicative of any substance use or otherwise presents as erratic or unsafe.

Script: TPO Foundation is committed to keeping children in our programs safe. Anyone under the age of 18 is a child. Our top priority is to ensure the safety of children in all that we do, and we have zero tolerance for Child Abuse and Exploitation. Here are some of the things you need to know during your program visit. Unless you discussed and agreed with TPO Foundation director some of the following actions named bellow, which are in such case a part of planed and approved activity for program realization, please do not do the following:

- During this visit, it is the responsibility of TPO Foundation staff to accompany you (the visitor/s) throughout your program visit. Our duty to protect children means that we must actively supervise any contact between you and the children in our programs.
- Please take care to treat all children with dignity and respect.
- We do not tolerate any form of child abuse -inadvertent or deliberate -including inappropriate physical contact of a violent or sexual nature, verbal aggression, and/or emotional maltreatment.
- Please do not provide money or anything of value to a child
- Please do not help children do things of a personal nature that they can do for themselves (e.g., dressing, toileting, washing, etc.).
- Exchanging contact information with children is not allowed. This includes phone, email, social media, instant messaging, or any other method of communication.
- Please do not ask children to share any personal information about themselves.
- While on this program visit, we ask that you immediately inform a staff member of any concern that you may witness.
- If you have questions about our Child Safeguarding policies or behaviors that are deemed to be harmful to children, please let the team leader/host know.

If we observe any concerns during the visit, it is our responsibility to intervene to ensure the safety and protection of the child.

ANNEX II

SEE ANNEX II - CHILD SAFEGUARDING ARTICLE IN ALL TPO-PARTNER CONTRACTS

Every contract that TPO Foundation sing with Partners, consultants, associates, vendors, volunteers, and other individuals, organizations or institutions with whom we work (collectively named partners) consist an article about respect of the Child Safeguarding Policy:

“The partner will be obliged to undertake actions in accordance with the Child Safeguarding Policy, respect the principles of human rights and the rights of children; he/she is obliged to report a Child Safeguarding incident, violation of the rights, integrity or dignity of children, if it happens during the program activity realization”.

ANNEX III

APPLICATION FORM FOR DISCLAIMER OF CHILD SAFEGUARDING POLICY

Every person taking part in program activity and witnessing the Child Safeguarding incident is obliged to report the incident through fulfilling the application form for disclaimer of Child Safeguarding Policy. Reporting is anonymous or public. Application is available on TPO Foundation site in English and Bosnian languages, and it is also available in electronic and hard copy in the places where the program activities take place.

Report:

APPLICATION FORM FOR DISCLAIMER OF CHILD SAFEGUARDING POLICY

Note: The content and information in this form will not be published, it will be used solely for the precise protection of children and prevention against all forms of violence towards children.

** In case you wish to remain anonymous, do not fill in the personal information sections

DATE OF APPLICATION: _____

NAME AND SURNAME OF APPLICANT: _____

CONTACT PHONE AND EMAIL OF APPLICANT:

DATE, PLACE AND TIME OF INCIDENT: _____

EVENT DESCRIPTION:

SIGNATURE OF APPLICANT: _____