

CHILD PROTECTION POLICY 2024/

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CHILD PROTECTION POLICY

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For the development of this policy material has been drawn from other organizations whose work, directly or indirectly, involves children. The guidelines provided in this document have been developed following the guidelines provided in Child Safeguarding Standards elaborated by Keeping Children Safe.

1.1. DEFINITIONS AND BASIC TERMS USED IN THE POLICY FOR THE PROTECTION OF CHILDREN AND ADOLESCENTS

For the purpose of the policy presented, the following definitions apply:

Child: every human being below the age of eighteen years unless, under the law applicable to the child, majority is attained earlier.

Child abuse1: All forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other 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.

Physical abuse: Physical abuse of a child is that which results in actual or potential physical harm from an interaction or lack of an interaction, which is reasonably within the control of a parent or person in a position of responsibility, power or trust. There may be a single or repeated incidents.

Emotional abuse: Emotional abuse includes the failure to provide a developmentally appropriate, supportive environment, including the availability of a primary attachment figure, so that the child can develop a stable and full range of emotional and social competencies commensurate with her or his personal potentials and in the context of the society in which the child dwells. There may also be acts towards the child that cause or have a high probability of causing harm to the child's health or physical, mental, spiritual, moral or social development. These acts must be reasonably within the control of the parent or person in a relationship of responsibility, trust or power. Acts include restriction of movement, patterns of belittling, denigrating, scapegoating, threatening, scaring, discriminating, ridiculing or other non-physical forms of hostile or rejecting treatment.

Sexual abuse: Child sexual abuse is 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 and cannot give consent, or that violate the laws or social taboos of society. Child sexual abuse is evidenced by this activity between a child and an adult or another

¹ WHO, World Health Organization (1999). Report of the Consultation on Child Abuse Prevention. Available at <https://apps.who.int/iris/handle/10665/65900>

child who by age or development is in a relationship of responsibility, trust or power, the activity being intended to gratify or satisfy the needs of the other person.

Neglect and negligent treatment: Neglect is the failure to provide for the development of the child in all spheres: health, education, emotional development, nutrition, shelter, and safe living conditions, in the context of resources reasonably available to the family or caretakers and causes or has a high probability of causing harm to the child's health or physical, mental, spiritual, moral or social development. This includes the failure to properly supervise and protect children from harm as much as is feasible.

Exploitation: Commercial or other exploitation of a child refers to the use of the child in work or other activities for the benefit of others. This includes, but is not limited to, child labour and child prostitution. These activities are to the detriment of the child's physical or mental health, education, or spiritual, moral or social- emotional development

Bullying²: Bullying is unwanted, aggressive behaviour among school-aged children that involves a real or perceived power imbalance. The behaviour is repeated, or has the potential to be repeated, over time.

² <https://www.coe.int/en/web/children/bullying>

- Make all employees and partners of INCLUSION realize the importance of taking action to protect children against abuse;
- Define the scope of responsibility of specific individuals for the safety of children involved in INCLUSION's activities;
- Undertake appropriate intervention in the case of suspected child abuse and/or direct threat to their health and life;
- Specify educational, preventive and interventional activities aimed at keeping children safe;
- Develop within the organization a culture of work based on children's rights and constant learning. Being familiar with Child Protection Policy and implementing it in practice are moral and professional obligations of all staff and partners of INCLUSION.

- Best interests of the child, which shall be the fundamental principle in decision-making.
- Respect for the rights of children, including the right to protection and the right to participate in decisions affecting their lives, as enshrined in the 1989 UN Convention on the Rights of the Child.
- Equal opportunities to ensure that all children can enjoy our activities in a safe environment, regardless of their gender, ability, race, ethnicity, age or circumstances. Children in vulnerable situations require special attention to optimise their safety and protection and promote their access to opportunities.
- The right of children and adolescents to be consulted on situations that will affect them and to have their views taken into account.
- Cultural sensitivity and recognition of the local context in decision-making and in designing our procedures.
- Responsibility to fulfil our duty of care to children, and to act when we believe that any child has been harmed or is at risk of harm.
- Training and support for INCLUSION's staff so that they are able to recognise, prevent and respond to child protection risks and potential incidents.
- Honesty and transparency. Informing those with whom we work, including children, of our Child Protection Policy and how we act to protect children.
- Ensuring confidentiality to protect sensitive personal data. Information will be used and communicated only to the extent necessary: it will only be accessed when essential to carry out official functions.

The Policy is also relevant to those with whom we come into contact through our activities, such as children and their parents and close family members, their communities, and other stakeholders such as government, civil society, and other non-governmental organisations, in order to clearly articulate our commitment as an organisation to protect children from harm.

INCLUSION has a duty of care to children with whom they work, are in contact with, or who are affected by their work and activities.

Risks assessments will be conducted in order to avoid risks and to take the appropriate safety measures that shall be included in the design phase of our projects, their development, and to be taken

into account in evaluation activities or any other action that involves direct or indirect contact with children.

In this sense, risk mitigation strategies will be developed aiming at minimizing risks in any event or activity that may involve children or that could have an impact on them.

1.1.2. SAFE RECRUITMENT

The 'safe' recruitment and pre-employment checks that are carried out as part of the recruitment process are the first mechanisms the organisation has in place to prevent the entry of potential offenders. INCLUSION will take all reasonable steps to prevent unsuitable individuals from working with children and adolescents. This includes not only staff who directly working with children, but also those who have access to them.

Spanish law establishes the obligation for all professionals and volunteers who work in regular contact with minors to provide negative certificates from the Central Register of Sexual Offenders. The Spanish Data Protection Agency in its report 0401/2015 interprets that in order to be considered as "regular work with minors", it is necessary that the work position implies, by its very nature and essence, regular contact with minors, being minors the main recipients of the service provided. It is therefore not necessary to present the certificate in those professions that, having a regular contact with the general public, among which minors can be found, are not by their nature exclusively aimed at a minor public.

In this sense, all staff members who may be involved in working with children, or who are deemed likely to come in contact with children in the fulfilment of their duties, will be requested to provide a certificate of their national criminal record, according to national legislation (La Ley Orgánica 1/1996, de Protección Jurídica del Menor, amended by Ley 26/2015 and Ley 45/2015).

1.1.3. CODE OF CONDUCT

In all cases, INCLUSION staff will be informed of INCLUSION's Code of Conduct and are obliged to adhere to it. Any member of staff found in breach of the Code of Conduct, or of the Child Protection Policy on which the code draws, will be evaluated based on case-by-case basis and, if required, disciplinary action will be undertaken.

1.1.4. EDUCATION/TRAINING

All INCLUSION staff whose work involves direct or indirect contact with children shall be trained in Child Protection, as it is essential that everyone knows their responsibilities and understands the organisation's policy and practices regarding appropriate behaviour towards children, as well as the appropriate procedures of response to concerns or allegations of child abuse or neglect.

1.1.5. SAFE PROGRAMME DESIGN

Child protection must be considered from the outset, during the project proposal development and planning phases.

Special attention will need to be paid to the protection of vulnerable children in order to make sure that all the relevant concerns are taken into account and addressed.

In order to avoid risks, when planning activities, INCLUSION takes into account the following considerations:

- Recognises that the family or community do not always welcome the participation of children in such activities.
- It ensures that special attention is paid to taking preventive measures to protect children in case of activities or events taking place in unfamiliar places and outside the family environment.

1.1.7. DIGITAL AND ONLINE CHILD PROTECTION

INCLUSION will handle all visual and narrative materials with respect and dignity, ensuring the portrayal of children is empowering, culturally appropriate, and protective of their identity.

- Always obtain informed consent from children and their guardians before collecting or using images, video, or audio.

- Do not conduct one-on-one online meetings with children unless strictly necessary, and always with prior written consent and appropriate supervision.
- All digital communication must be professional, respectful, and secure. Use institutional accounts only.
- Ensure that video calls are held in appropriate environments, avoiding display of private spaces and maintaining professional conduct.
- Digital materials must not expose any personally identifiable information (name, location, contact details) without consent.

1.1.8. INCLUSION AND NON-DISCRIMINATION

INCLUSION upholds the rights of all children regardless of their race, gender, ability, socioeconomic background, nationality, sexual orientation, gender identity or expression. We are committed to:

- Providing a safe and supportive environment for all children, including those identifying as LGBTQ+.
- Ensuring that no form of discrimination or bias influences the design or implementation of our programmes.
- Promoting awareness and respect for diverse identities and experiences among all staff and partners.

1.1.9. MANAGEMENT RESPONSIBILITIES

INCLUSION's management have the overall responsibility to ensure the Policy's implementation and to maintain it up-to-date with current legislation and practice. Moreover, the organization's management has a responsibility to act as a support and source of information for staff on safeguarding of children and providing the resources and guidance needed for the implementation of this Policy, so as to ensure that all staff are aware of, can understand and adhere to the Child Protection Policy.

1.1.10. REPORTING/RESPONDING TO CONCERNS

INCLUSION aligns its safeguarding commitments with Ley Orgánica 8/2021, de protección integral a la infancia y la adolescencia frente a la violencia (LOPIVI), which came into force in 2021. This law strengthens child protection efforts in Spain through a range of mandatory provisions.

INCLUSION has a duty to ensure an appropriate response to suspected or actual situations of abuse or harm both within and outside the organisation and to ensure appropriate prosecution of offences that may have been committed.

It is not the responsibility of INCLUSION staff to decide whether or not child abuse or maltreatment has occurred. However, all staff have an obligation to report any concerns, even if they are vague suspicions or a mere intuition that something is wrong.

No member of staff may agree to keep secret information relating to suspected or actual cases of child abuse or maltreatment as a personal confidence.

In case of suspicion or allegation of child abuse, INCLUSION staff must immediately report the situation to management using the form attached to this document. All concerns and allegations will be treated with the outmost seriousness, regardless of the identity of the alleged perpetrator or victims and will be processed and evaluated with extreme confidentiality.

INCLUSION will contact the appropriate law enforcement agencies if a case with possible criminal implications is presented.

1.1.11.IMPLEMENTATION AND REVIEW

This Policy shall be reviewed every two years by INCLUSION in order to evaluate if any amendments are needed.

This Child Protection Policy has been approved by:

Juan Guerrero Caballero, General Manager



INTERNATIONAL CONSULTING AND MOBILITY AGENCY, S.L.
Calle Madrid, 2 Bajo - 41001 SEVILLA
Telf: 954 22 50 53 - Fax: 954 22 49 72
C.I.F.: B-91302695 - www.incoma.net

Next review date: January 2026

1.7. REPORT OF INAPPROPRIATE OR SUSPECT BEHAVIOURS OF CHILD ABUSE OR NEGLECT IN ACCORDANCE WITH INCLUSION'S CHILD PROTECTION POLICY

Information on the reporting subject³:

Name:
Surname:
Function:
Email:
Telephone:
The identity of the reporting subject will not be made public and will be treated only for the purposes of a possible legal action

Information on the alleged inappropriate behaviour:

☐ Physical child abuse

³ The reporting subject's data will be treated according to EU Regulation 2016/679 (The EU General Data Protection Regulation).

Protection Regulation - GDPR) , and for the exclusive purpose of this reporting.

- ☐ Child emotional abuse
- ☐ Child sexual abuse
- ☐ Child exploitation
- ☐ Bullying
- ☐ Neglect
- ☐ Other types of child mistreatment or inappropriate behaviour

Context of the inappropriate or suspect behaviour:

Date:
Place:
Circumstance (training, event, other activities...)

Details on the concern:

Please describe the reason for concern, if there are any obvious signs of abuse, if anyone else was involved and, if so, how were they involved? Please detail If there are more people that have been informed on the alleged inappropriate behaviour and if any action has been taken, as well as any other information that you may consider relevant.

This image shows a full page of a handwriting practice worksheet. It consists of multiple sets of three horizontal dashed lines, providing a guide for letter height and placement. The lines are evenly spaced and extend across the entire width of the page. There is no text or other markings on the paper.

Have you observed this behaviour personally?

☐ Yes

☐ No – If not, how did you learn about it? _____

To your knowledge, is this behaviour reiterated?

☐ Yes

☐ No

Comments _____

Information on the alleged author of inappropriate or suspect behaviour:

Name
Surname
Function

Declaration

By submitting this report, the reporting subject declares that:

1. He/she is aware that, should the report give rise to legal action against the author of the suspect behaviour it may be used as an official statement;
2. He/she is in good faith and that all the information provided above is correct and truthful;
3. He/she is aware that purposely providing false accusations against someone may result in civil lawsuits and criminal prosecution.

Date:

Signature of the reporting subject:

CONTACT DETAILS

/// WHERE WE ARE BASED:

- 📍 C/ Madrid 2, Edificio San Buenaventura
41001 Seville (Spain)
- 📍 C/ Muñoz Olivé, 1 Puerta 2 . Segunda
planta. Módulo 1

/// REACH US AT:

☎ +34 955 35 29 80/+34 955 495 777

✉ info@inc-lusion.eu

🌐 inc-lusion.eu

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