

# CHILD PROTECTION AND SAFETY POLICY



SOLIDARIDAD SIN FRONTERAS

# CHILD PROTECTION AND SAFETY POLICY

## 1. Introduction

The Child Protection and Safety Policy of Solidaridad Sin Fronteras outlines our commitment to safeguarding children, adolescents, and youth participating in our activities, services, and projects. Child protection refers to prevention and response to all forms of abuse, neglect, exploitation, and violence against children. This Child Protection Policy is published on the Solidaridad Sin Fronteras web site.

## 2. Scope

This policy applies to all individuals associated with Solidaridad Sin Fronteras, including employees, volunteers, interns, consultants, contractors, and any other collaborators. It encompasses measures to prevent accidents, injuries, and other safety risks in addition to safeguarding against maltreatment and abuse.

## 3. Policy Standards

**Policy:** We prioritize the safety and security of children in all aspects of our work, guided by principles of prevention, precaution, and preparedness. Our policies and procedures align with international standards and best practices in child protection and safety.

**People:** We empower all individuals associated with Solidaridad Sin Fronteras to contribute to the safety of children by providing training, resources, and support. Employees and collaborators are encouraged to identify and address safety concerns proactively.

**Procedures:** We have established clear procedures for assessing and mitigating safety risks in our activities, services, and projects. These procedures include conducting risk assessments, implementing safety measures, and responding effectively to emergencies and incidents.

**Accountability:** We maintain accountability for child safety through regular monitoring, evaluation, and review of our safety measures. Internal audits and external assessments are conducted to ensure compliance with our policies and standards and identify areas for improvements.

## 4. Child abuse and exploitation definitions

According to the World Health Organization, “child abuse” or “maltreatment” constitutes ‘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'<sup>1</sup>.

Our understanding of child abuse and exploitation includes, but it not limited to:

- Physical abuse<sup>2</sup> may involve hitting, shaking, throwing, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or care giver feigns the symptoms of, or deliberately causes ill health to a child who they are looking after. This is commonly described using terms such as 'fictitious illness by proxy 'or 'Munchausen's syndrome by proxy'.
- Emotional abuse<sup>3</sup> is defined as the persistent emotional ill-treatment of a child such as to cause severe and persistent effects on the child's emotional development. It may involve conveying to children that they are worthless and unloved, inadequate, or valued only so far as they meet the needs of another person. It may involve age or developmentally inappropriate expectations being imposed in children. It may involve causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of ill-treatment of a child, though it may occur alone.
- Sexual abuse<sup>4</sup> involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g., rape) or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic materials or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.
- Neglects is defined as the persistent failure to meet the child's basic physical and/ or psychological needs, likely to result in the serious impairment of the child's physical or cognitive development.
- Bullying<sup>6</sup> may be defined as deliberately hurtful behavior, usually repeated over a period of time, where it is difficult for those bullied to defend themselves. It can take many forms, but the three main types are physical (e.g., hitting, kicking, theft), verbal (e.g., racist or homophobic remarks, threats, name calling) and emotional (e.g., isolating an individual from the activities and social acceptance of their peer group).
- Sexual abuse of children<sup>7</sup> can also be defined as contacts or interactions between a child and an older or more knowledgeable child or adult (a stranger, sibling or person in a position of authority, such as a parent or caretaker) when the child is being used as an object of gratification for an older child's or adult's sexual needs. These contacts or interactions are carried out against the child using force, trickery, bribes, threats or pressure. Sexual abuse can be physical, verbal or emotional.

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<sup>1</sup> The WHO definition of Child Abuse as defined by the Report of the Consultation on Child Abuse Prevention WHO – 1999

<sup>2</sup> Source: Child protection fact sheet: The definitions and signs of child abuse. NSPCC, 2009.

<sup>3</sup> Source: Child protection fact sheet: The definitions and signs of child abuse. NSPCC, 2009.

<sup>4</sup> Source: Child protection fact sheet: The definitions and signs of child abuse. NSPCC, 2009.

<sup>5</sup> Source: Child protection fact sheet: The definitions and signs of child abuse. NSPCC, 2009.

<sup>6</sup> Source: Child protection fact sheet: The definitions and signs of child abuse. NSPCC, 2009.

<sup>7</sup> Source: Definitions of Child Sexual Exploitation and Related Terms. NGO Group for the Convention on the Rights of the Child, 2000.



- Commercial sexual exploitation of children<sup>8</sup> comprises sexual abuse by the adult and remuneration in cash or kind to the child or a third person or persons. The child is treated as sexual object and as a commercial object. The commercial sexual exploitation of children constitutes a form of coercion and violence against children and amounts to forced labor and a contemporary form of slavery.
- Child pornography<sup>9</sup> means any representation, by whatever means, of a child engaged in real or simulated explicit sexual activities or any representation of the sexual parts of a child for primarily sexual purposes. This can include photographs, negatives, slides, magazines, books, drawings, movies, videotapes and computer disks or files. Generally speaking, there are two categories of pornography: soft-core which is not sexually explicit but involves naked and seductive images of children and hard core which relates to images of children engaged in sexual activity and use of children in the production of pornography is sexual exploitation.<sup>12</sup>
- Violence was defined by the UN Secretary General's Study on Violence as 'physical, psychological (psychosocial), and sexual violence to children through abuse, neglect or exploitation, as acts of commission or omission in direct or indirect forms, that endanger or harm the child's dignity, physical, psychological, or social status, or development.'<sup>10</sup>
- Commercial exploitation means exploiting a child in work or other activities for the benefit of others and to the detriment of the child's physical or mental health, education, moral or social-emotional development. It includes, but is not limited to, child labor.

A child who is being abused may experience more than one type of cruelty. Discrimination, harassment, and bullying are also abusive and can harm a child, physically and emotionally.

## 5. Measures for Child Safety

**Risk assessment:** Before engaging in any activity or project involving children, we conduct thorough risk assessment to identify potential safety hazards and implement appropriate control measures,

**Supervision:** Children participating in our activities are supervised at all times by qualified staff and volunteers who have undergone background checks and training in child safety and supervision.

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<sup>8</sup> Source: Questions and Answers about the Commercial Sexual Exploitation of Children. ECPAT International, 2001.

<sup>9</sup> Source: Optional Protocol to the Convention on the Rights of the Child on the sale of children, child prostitution and child pornography. United Nations, 2000.

<sup>10</sup> Source: The UN Secretary General's Study on Violence, 2005.



**Transportation Safety:** We ensure that transportation arrangements for children are safe and secure, including the use of seat belts, appropriate seating arrangements, and supervision during travel.

**Facility Safety:** Facilities used for our activities are inspected regularly to ensure compliance with safety regulations and standards. Safety measures such as fire exits, first aid kits, and emergency contact information are prominently displayed.

**Health and Hygiene:** We promote good health and hygiene practices among children, including handwashing, sanitation, and proper nutrition. First aid supplies and trained personnel are available to address medical emergencies.

**Communication and Reporting:** We maintain open communication channels for reporting safety concerns or incidents involving children. All reports are treated confidentially and investigated promptly and thoroughly.

**Training and Capacity Building:** We provide training and capacity building opportunities for staff and volunteers on child safety policies, procedures, and practices. This includes training on recognizing signs of abuse, responding to emergencies, and promoting a culture of safety.

## 6. Child Protection Representatives

Solidaridad Sin Fronteras has designated a Child Protection Representative responsible for overseeing the implementation of this policy and serving as the primary point of contact for child protection concerns:

Mr. Álvaro Will Ibáñez Tudela – [info@ssf.org.es](mailto:info@ssf.org.es)

## 7. Dos and Don't Dos

Dos:

- Do prioritize the safety and well-being of children in all activities and interactions.
- Do provide regular training and support to staff and volunteers on child protection policies and procedures.
- Do maintain open communication channels for reporting concerns or incidents involving children.
- Do conduct regular risk assessments and implement appropriate safety measures.
- Do respond promptly and effectively to child protection concerns or incidents.

Don'ts:



- Don't ignore or minimize concerns raised about the safety or well-being of children.
- Don't engage in behavior that could jeopardize the safety or dignity of children.
- Don't tolerate any form of maltreatment, abuse, or exploitation of children.
- Don't hesitate to seek guidance or support from the designated Child Protection Representative or relevant authorities when necessary.

## 8. Reporting procedures

All staff, volunteers and interns should be alert to signs that may suggest a child is in need of help (see annex 1). Deciding whether to report can be a very difficult responsibility. The reporting procedure is made widely available to ensure that everyone is clear what steps to take regarding the safety of children and other witnesses.

All witnessed, suspected or alleged violations of Solidaridad Sin Fronteras' Child Protection Policy will be immediately reported to the Child Protection Representative (CPR) using the safeguarding reporting form (annex 2). The guiding principle here is that the safety of the child is always the most important consideration. These records will be stored securely with access limited to the Child Protection Representative or the Management Board.

At meetings and activities where children are directly involved, children will be informed about Solidaridad Sin Fronteras' safeguarding policy, code of conduct, the existence of the child protection focal person and complaints mechanism in a child-friendly manner.

The first stage is to decide whether the concerns are internal to the organization or relate to an external situation.

When a child protection/safeguarding concern is brought to your attention – ACT:

- Act on your concerns. If in doubt, speak out.
- Child-centered. The protection of children is the most important consideration.
- Time counts. Ensure timely, effective, confidential and appropriate responses to child safeguarding issues.

If the concern is internal – regarding the behavior of staff, volunteers, interns, MB member or members, you have to consider whether you need to report to the local/national authorities. If not, the internal safeguarding procedure needs to be applied. If yes, you have to report to the designated authorities and follow-up on action taken by the authorities and decide on further response, record case and action taken.



If the concern is external - meaning that there is concern regarding abuse outside the organization, you have to consider whether the concern is due to the way the organization is delivering business and then decide whether this needs reporting to local or national authorities. After this the same procedure as for internal concerns is applied. The CPR will act on the concerns or allegations in a confidential manner in accordance with the standardized process developed by Solidaridad Sin Fronteras in the best interests of the child, irrespective of the nature of the referral, who the allegations are about or who the referrer is or where she/he is from. The CPR will take appropriate action to protect the child/children in question from further harm and during and following an incident or allegation. An assessment of the specific kind of support and assistance that is needed by the child(ren) affected by the incident will be immediately offered. This may also involve arranging a medical assessment. The relevant contact details for child protection services, local services department, policy, emergency medical help and help lines will also be readily available and easily accessible. The CPR will be responsible to contact the child's family (or guardian) and inform them of the incident and assistance provided. A safeguarding report (annex 2) must be

compiled to document details of the incident. The "best interests of the child" must be considered throughout the process.

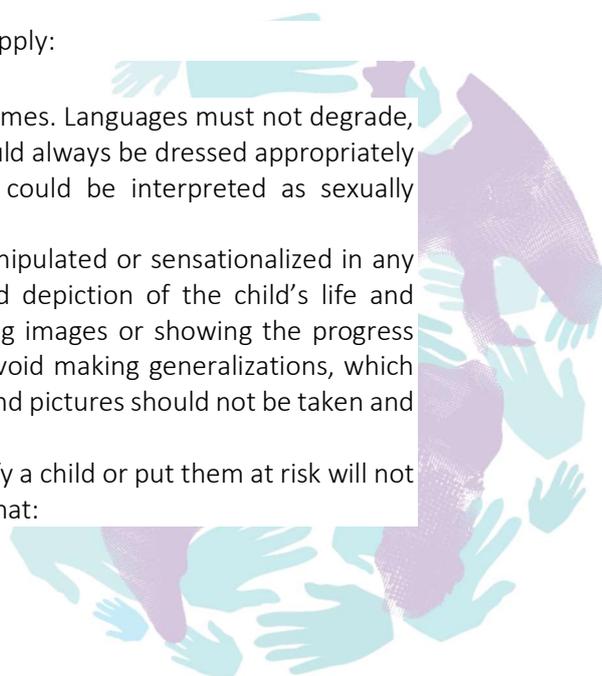
An assessment of the specific kind of support and assistance that is needed by the children affected by the incident will be offered.

## 9. Children's data protection

According to the Privacy Policy, personal data gathered by Solidaridad Sin Fronteras will be used only for the provision of the service and/or for accounting reason. Solidaridad Sin Fronteras will not use users' data to profile them, generally and especially for children's data. In addition, Solidaridad Sin Fronteras commits to keep children safe at all times, also considering that different countries may have specific laws, protocols or cultural norms, which should be understood and adhered to as appropriate. All child protection measures in the Child Protection Policy are equally applicable in media and communication activities by Solidaridad Sin Fronteras, including the use of social media. Solidaridad Sin Fronteras will ask to obtain written consent of the parent/care giver or legal guardian of children that clearly states if they agree that photos or statements of children can be publicly used or not.

Communicating about children, the following principles will apply:

- Dignity: The child's dignity must be preserved at all times. Languages must not degrade, victimize or shame the child. In images, children should always be dressed appropriately and should never be depicted in any poses that could be interpreted as sexually provocative.
- Accuracy: The portrayal of children must not be manipulated or sensationalized in any way. Images and stories should provide a balanced depiction of the child's life and circumstances, balancing negatives with empowering images or showing the progress that children are making. Communications should avoid making generalizations, which do not accurately reflect the nature of the situation and pictures should not be taken and used out of context.
- Privacy: Any information that could be used to identify a child or put them at risk will not be used. SOLIDARIDAD SIN FRONTERAS, will ensure that:



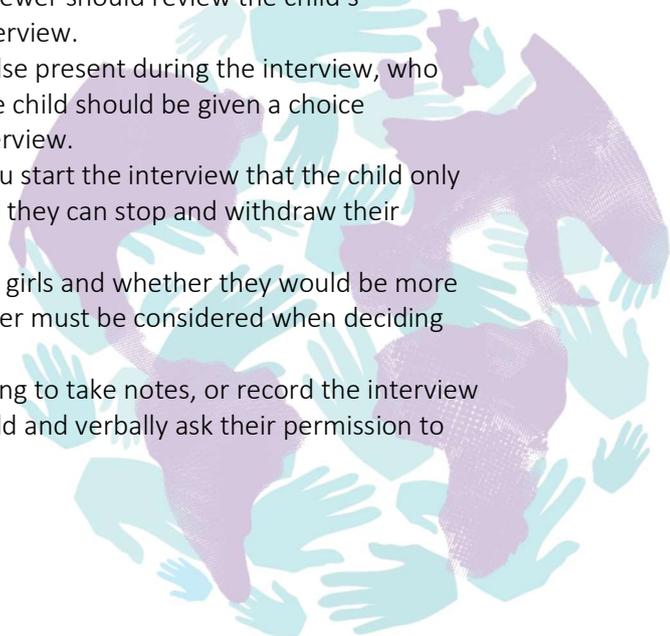
- Only use first names of children: be careful not to reveal details about the place where they live, their school and other information that would lead to their place of residence. If needed for child safeguarding, the names of children will be changed.
- Information about a child/children's life and photographs of children (including information stored on the computer) will be kept in secure files. Access to these should be limited to those that need to use them during the course of their work.
- The recorded images should focus on an activity and, where possible, feature groups of children rather than individuals.
- Complaints procedure: Any complaints or concerns about inappropriate or intrusive images should be reported and recorded like any other child protection concern (see chapter 8).

Solidaridad Sin Fronteras commits to ask and obtain informed consent before taking any photos, videos, or requesting personal information about children's lives that may then be used in the communication materials. Informed consent means that children are told how Solidaridad Sin Fronteras may use the information or image/film and that they are under no obligation to agree to its use. They should also be re-assured that locations and other identifying information that might lead to the location of residence of children will be changed.

They will need to be asked whether they give consent that their first name is shared with the information or image/film, and in this case, consent must be obtained by completing and signing the media consent form. Consent is also required from the child's parent/care giver or guardian, who must countersign the form or, where this is not possible, from the organization working with them. The organizations working with the children should lead on asking for consent of children and families, as they may feel more comfortable to refuse consent when asked by someone they already know and trust. The media consent forms, and other consent forms will be kept on the child's file by Solidaridad Sin Fronteras or by the organizations working with the children, to be forwarded to Solidaridad Sin Fronteras on request. Obtaining prior written consent, does not mean that there is no requirement to obtain verbal consent at the time of taking photographs/video/interviews.

Interviewing children requires skills and certain basic principles should be followed to ensure their dignity and their rights are respected.

- Informed Consent: In relation to interviews, informed consent includes explaining what subjects are likely to be covered in the interview and clarifying the child's right to withdraw their consent at any point. The interviewer should review the child's understanding of consent at the start of the interview.
- Provision of support: There should be someone else present during the interview, who the child is familiar with. Wherever possible, the child should be given a choice regarding who supports him/her during the interview.
- Respecting the right to say No: Be clear before you start the interview that the child only has to talk if they are comfortable doing so, and they can stop and withdraw their consent at any point.
- Gender: Consider the different needs of boys and girls and whether they would be more comfortable to talk to a man or a woman. Gender must be considered when deciding what topics may be discussed.
- Respecting the right to information: If you are going to take notes, or record the interview in another way, you must explain this to the child and verbally ask their permission to do so.



Special care must be taken when organizing visits for external photographers, filming crews, journalists or visitors within the scope of the projects, activities and publications:

- Journalists, photographers/film crews must be fully briefed about Solidaridad Sin Fronteras' child protection policy before they meet the children, who will be interviewed, photographed or filmed. They sign their commitment to adhere to this policy.
- Make sure that photographers and filmmakers are not allowed to spend time with or have access to children without supervision. They have to be accompanied by Solidaridad Sin Fronteras staff at all times.
- Children, parents and guardians must be informed about how the film, photograph or story will be used and consent for this obtained. This is distinct to the consent they have given for use of materials by Solidaridad Sin Fronteras or the national/local organization they are involved in.
- Copies of images, film and story should be sent to the (member) organization to be passed on to the children.
- In order to protect the confidentiality and privacy of the children, Solidaridad Sin Fronteras must be notified as to how the photographer or film maker intends to use the images or stories. Solidaridad Sin Fronteras reserves the right to refuse use if it is felt that, in doing so we are not acting in accordance with our child protection policy and our media and communication principles.
- If an image or any material is to be used by another organization, it must be credited to Solidaridad Sin Fronteras /Photographer's Name © with an appropriate caption.

## 10. Safe recruitment policy

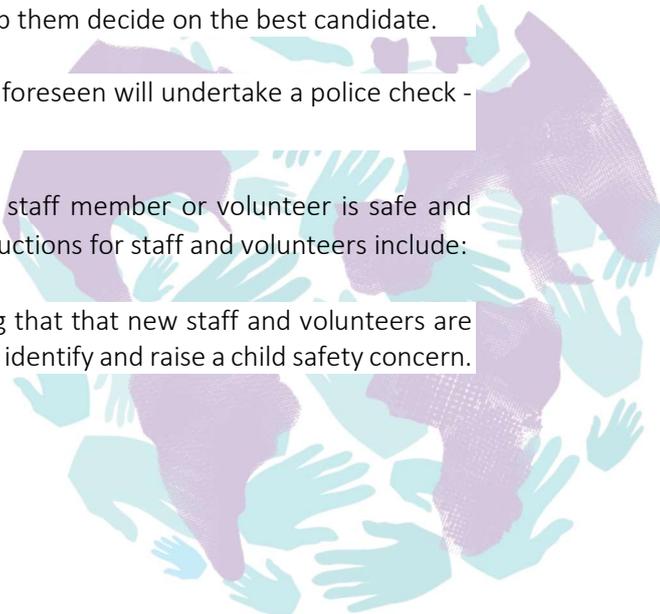
Solidaridad Sin Fronteras's job advertisements, both for employees and volunteers, include details about our organization's commitment to being child safe and we conduct a robust interview process that involves:

- Setting up an interview panel: we decide who will take part in the selection process to help pre-assess the applicants and conduct the interviews.
- Short-listing: we pre-assess applicants' suitability to work with children and develop a short list.
- Having the interview: we decide on the questions we want to ask. For child-related roles, questions will generally focus on the applicants' experience working in previous child-related roles.
- Assessing candidates and making the final selection: the panel discuss the interviews and make notes on strengths and weaknesses to help them decide on the best candidate.

Candidates for a position where contact with children is foreseen will undertake a police check - broader national criminal history check or other checks.

Solidaridad Sin Fronteras recognize that making sure a staff member or volunteer is safe and suitable to work with children is an ongoing process. Inductions for staff and volunteers include:

- an overview of all our child safe policy, ensuring that that new staff and volunteers are advised of their reporting obligations and how to identify and raise a child safety concern.



- a tour of our premises explaining any physical risks new recruits should be aware of (which are included in our Child Safe Risk Management Plan) and relevant behaviors on site as set out in our Code of Conduct, including the use of personal devices.
- ensuring new recruits complete required child safe training (see below), and
- monitoring and supervision.

Solidaridad Sin Fronteras support new recruits and volunteers with appropriate instruction and feedback when needed, including regular oversight as they become familiar with the new role.

Staff and volunteers also receive ongoing child safe training. Staff and volunteers are told when child safe policies are reviewed and Solidaridad Sin Fronteras invites them to contribute and read the updated documents.

## 11. Conclusion

Solidaridad Sin Fronteras is committed to creating a safe and nurturing environment for children involved in our programs and activities. By adhering to this Child Protection and Safety Policy and fostering a culture of vigilance and accountability, we strive to fulfill our duty to protect the rights and dignity of every child.

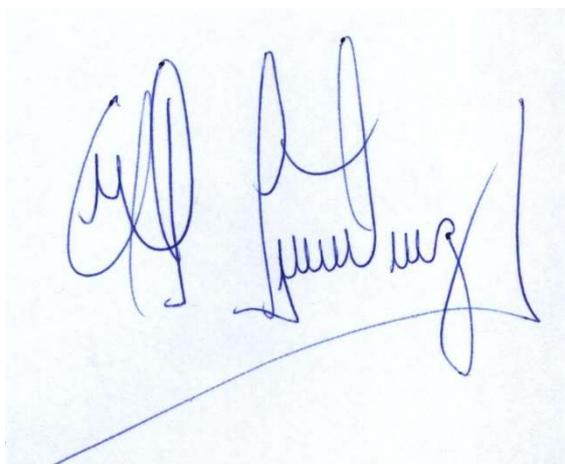
Date of Policy Implementation: 28.04.2025.

This policy will be revised within 31.12.2026.

### Signed:

D. Álvaro Will Ibáñez Tudela

CEO and Legal Representative – SSF



## Annex 1 – Recognizing signs of abuse

Recognizing indications of potential abuse is complex and there is no simple checklist, which allows easy recognition. There are potential warning signs that you can be alert to, but they should be assessed with care. It should not be automatically assumed that abuse is occurring. Equally, however, it is important not to dismiss your concerns or ignore any signs of abuse – these should be discussed with the CPF as soon as possible to help decide the most appropriate course of action.

### Possible signs of physical abuse:

- Bruises, burns, sprains, dislocations, bites, cuts.
- Improbable excuses given to explain Injuries.
- Refusal to discuss injuries.
- Withdrawal from physical contact.
- Arms and legs kept covered in hot Weather.
- Unwillingness to participate in physical activities that may involve undressing, e.g., sports.
- Fear of returning home or of parents being contacted.
- Showing wariness or distrust of adults.
- Self-destructive tendencies.
- Being aggressive towards others.
- Being very passive and compliant.
- Chronic running away.

### Possible signs of neglect:

- Frequent hunger.
- Taking scraps of food from bins or plates or stealing food.
- Poor personal hygiene.
- Constant tiredness.
- Inappropriate clothing, e.g., summer clothes in winter.
- Frequent lateness or non-attendance at school.
- Untreated medical problems.
- Low self-esteem.
- Poor social relationships.
- Compulsive stealing.
- Drug or alcohol abuse.

### Possible signs of emotional abuse:

- Physical, cognitive or emotional development is delayed.



- Highly anxious.
- Showing delayed speech or sudden speech disorder.
- Fear of new situations.
- Low self-esteem.
- Inappropriate emotional responses to situations.
- Extreme passivity or aggression.
- Drug or alcohol abuse.
- Chronic running away.
- Compulsive stealing.

#### **Possible signs of sexual abuse:**

- Age-inappropriate sexualized behavior or highly sexualized language.
- Bed wetting or soiling.
- Anal or genital soreness.
- Sleep problems.
- Fear of being with adults.
- Promiscuity.
- Extreme risk taking in adolescents.

#### **Possible signs of concern regarding adult behavior:**

- A person in whose presence the behavior of a child significantly changes such as becoming withdrawn, fearful, distressed or agitated.
- Asking a child to lie or keep secrets.
- Breaches of the organization's Code of Conduct/behavior protocols.
- Initiating private contact with a child, in person or by e-mail or phone.



## Annex 2 – Safeguarding Reporting Form

If you have knowledge that a child might be at risk of harm, please complete this form to the best of your knowledge. Please note that child protection concerns must be reported (orally or in writing) directly to the Child Protection Representative at SOLIDARIDAD SIN FRONTERAS (preferably within the same working day) – depending on the urgency, you may wish to complete this form before contacting the CPR or you may wish to complete the report afterwards.

Also use this form to report an accident or incident. An accident is an unplanned event that results in an injury or could have resulted in an injury or results in damage to equipment or property OR harm to the environment. An incident is an unpleasant or unusual event.

The report should be written and signed only by you to guarantee confidentiality. It should be sent only to the CPR, who will hold it in a safe and secure place and treat it with the strictest confidentiality.

The form below will be translated and adapted to the languages in use among the members of the consortium, also considering the customs and legislation of the different countries.

### 1. About you

Your name: \_\_\_\_\_

Your job title: \_\_\_\_\_

Organization you work for: \_\_\_\_\_

Nature of your contact with the child: \_\_\_\_\_

Contact details: Tel: \_\_\_\_\_

E-mail: \_\_\_\_\_

### 2. About the child

Child's name: \_\_\_\_\_

Child's gender: \_\_\_\_\_

Child's age: \_\_\_\_\_

Child's address: \_\_\_\_\_

Child's parents/guardians: \_\_\_\_\_



Has any treatment been given to the child?

Treatment given by \_\_\_\_\_

Taken to hospital YES \_\_\_\_\_; NO \_\_\_\_\_.

If yes, which hospital and how taken \_\_\_\_\_

### 3. About your concern; Details of incident

Was the incident:

Observed by you                      Suspected                      Disclosed by someone else.

If the concern was shared by someone else, please state who and their relationship to the child:

\_\_\_\_\_

What happened? Give cause (how and why) if known - If you include personal observations, please make a distinction between what is a fact and what is opinion or hearsay (e.g., child's emotional state, visible injuries, etc.):

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Did the child/young person or another source say anything to you [if relevant] and how did you respond to him or her: [Do not lead the child. Record actual details]

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Date of the alleged incident: \_\_\_\_\_

Time of the alleged incident: \_\_\_\_\_

Location of the alleged incident: \_\_\_\_\_

Name of the alleged perpetrator (if applicable): \_\_\_\_\_

Were there any other children/people involved in the alleged incident?

Are any other children at risk of harm? \_\_\_\_\_



Action taken by you:

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Signature: \_\_\_\_\_

Date: \_\_\_\_\_

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For completion by the Child Protection Representative person:

Incident/Accident investigated:                      Yes    No

Written investigation reports necessary:    Yes    No

Written investigation reports necessary:    Yes    No

In order to determine the cause of the incident or accident, it may be appropriate to interview parties who were involved. Witness detail, statements, etc. can be added here.

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