Child Protection Policy

Of Asociación Caminos

This policy has been reviewed and approved by



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1. Introduction

Asociación Caminos confirms its principle to respect the rights of the child, the right to be protected from all forms of abuse, neglect, exploitation, and violence as set out in the 1989 UN Convention on the Rights of the Child (UNCRC), as well as in the Council. Of Europe Convention on Protection of Children against Sexual Exploitation and Sexual Abuse (Lanzarote Convention, 2007).

Definitions

Term	Definition	References
Child	Any person under the age of 18.	Article 1 UNCRC (1989)
Safeguarding	All measures taken to protect children from harm, ensuring their wellbeing, and creating safe environments where their rights are upheld. Goes beyond responding to abuse, including proactive prevention.	Keeping Children Safe Standards (2021); EU Strategy on the Rights of the Child (2021–2024).
Child Protection	Specific actions and procedures aimed at responding to cases of abuse, neglect, exploitation, or harm suffered by a child, including referral to competent authorities.	Lanzarote Convention (2007, Law 172/2012)
Abuse	Any form of physical, emotional, sexual mistreatment or neglect that results in actual or potential harm to a child's health, development, or dignity.	UNCRC Art. 19; WHO definitions
Neglect	Persistent failure to meet a child's basic needs (food, shelter, health, education, supervision, protection from danger). Considered a form of abuse when it leads to harm or risk of harm.	UNCRC Art. 27

Exploitation		ILO Convention No. 182 (1999)
Child Safeguarding Concern	Any situation where there is reason to believe that a child is at risk of, or has experienced, harm, abuse, neglect, or exploitation.	Keeping Children Safe Standards; CERV call requirements.

All children with whom staff of Asociación Caminos, internals, volunteers, external collaborators and associates come in contact will be assured the rights expressed in the UNCRC.

Asociación Caminos understands that child abuse and inappropriate contact of children is a pervasive problem and takes prevention of child abuse very seriously. To manage this problem in a proactive manner the principles of this manual and guidelines show the commitment to take proactive steps to protect children in programs and facilities of Asociación Caminos.

All decisions and actions taken are guided by the principle of the "best interest of the child".

2. Child Protection Policy

This document outlines the policies regulating the behaviour and approaches taken by staff, internes, volunteers and collaborators of Asociación Caminos within their professional roles.

The Policy paper sets out the basic principles on which the following aspects of professional behaviour and acting is based within Asociación Caminos:

- Screening and hiring
- Conduct when working with children
- Training
- Cooperation with other partners

3. Principles and Values

Asociación Caminos is committed to the following values and principles, which should be respected and promoted by its staff, interns, and collaborators. Asociación Caminos values and treats every person without discrimination of any kind, irrespective of age, race, colour, sex, language, religion, political or other opinion, ethic or social origin, gender identity, disability, birth, or other status. Asociación Caminos recognises the right of every child to be protected from harm and abuse.

Asociación Caminos takes all necessary action to prevent any harm done against children and to report abuse of children. Asociación Caminos prioritizes the right of every child in the organisation's acivities. Asociación

Caminos promotes and supports the approach of the right of children to be heard and share their views.

Asociación Caminos aims to provide all necessary guidance to its employees, interns, volunteers, and collaborators who work in close contact with children.

4. Screening and Hiring

All staff members / volunteers / apprentices are to complete an application form before working including questions about their past work history, volunteering experiences and education / training.

All application forms are to include a statement that Asociación Caminos has a zero-tolerance policy regarding abuse and inappropriate behaviour by any staff member.

All staff members / volunteers / associated personal who may be involved in the work with children and/or young people, or who may come in contact with children during their work, will be expected to provide a certificate of their national criminal record, according to the national legislation.

References Check

Asociación Caminos reserves the right to conduct the following references procedures to any staff member or possible future staff member:

- Contacting references listed and/or named by the prospective staff or volunteers, including relatives of the applicant.
- Contacting previous employers to check ability and eligibility of the applicant to work with children.
- Verbally verifying listed (written) references through phone calls or other means of contact.
- Researching an applicant online and checking for red flags regarding the work with children (i.e., Google Search, Social Networking channels, any national website for sexual predators).

Interviews

Possible future staff members will be interviewed by at least two staff members. It is important that the candidate is assessed by more than one staff member.

All interviews are documented on an interview form, standardized within Asociación Caminos, to ensure the consistency of the questions asked.

5. Principles of Conduct when coming in contact/ working with children

Before working with children or performing any work duties that may put the staff members in contact with children, the staff members / volunteers are expected to sign and date a copy of the Code of Conduct of the organisation to which the Child Protection Policy is part of. They will receive and are expected to carefully read an updated copy of the Code of Conduct and of the Child Protection Policy annually.

The signed Code of Conduct is included in their personnel file and is attached to their employment contract.

The administration of Asociación Caminos will review the Child Protection Policy regularly (minimum of once per year) and share it with all departments and staff member to ensure all personnel is informed. The Code of Conduct and the Child Protection Policy will be made available to all staff members electronically and in printed version. As mentioned, staff members / volunteers will receive a copy of both documents and are requested to sign them.

All external partners / collaborators / associates will be provided with the Child Protection Policy and Code of Conduct and are requested to sign it if they work or may come in contact with children and/or young people with less than 18 years of age during their work duties in collaboration with Asociación Caminos.

6. Risk Assessment and Safe Activities

Asociación Caminos is committed to ensuring that all activities involving children and young people take place in a safe and protective environment. Potential safeguarding risks must be identified and addressed before activities are implemented.

All activities involving children and young people, including workshops, events, excursions, international exchanges, research activities and online activities, should be planned with consideration of potential risks to their safety and wellbeing.

The following principles shall be observed:

- Risk assessment: Potential safeguarding risks must be identified before the implementation of activities involving children. Appropriate preventive measures must be established to minimise or eliminate identified risks.
- Safe supervision: Activities must be supervised by appropriately informed and responsible staff members, volunteers or collaborators. Supervision arrangements should take into account the age of the children, the nature of the activity and the number of participants.
- Appropriate conduct: Staff members, volunteers and collaborators must maintain appropriate professional boundaries when interacting with children. Situations

involving one-to-one contact should be avoided wherever possible and, when necessary, managed in a transparent and appropriate manner.

- Transport and accommodation: Particular attention must be given to safeguarding arrangements during travel, excursions, overnight stays and accommodation involving children and young people.
- Online safety: Digital communication and online activities involving minors must respect the principles of this Child Protection Policy. Communication must remain appropriate, transparent and related to the professional or project activity.
- Reporting risks: Any identified safeguarding risks or unsafe situations must be communicated to the designated person responsible for child protection so that appropriate measures can be taken.

All staff members, volunteers and external collaborators are responsible for contributing to a safe environment and ensuring that their activities and behaviour are consistent with the principles of this policy.

7. Data Protection of Children

The Code of Conduct includes information regarding the procedures for data collection, treatment and protection for children and young people. Data privacy and protection issues shall comply with relevant EU-wide rules and standards (with special regards to the General Data Protection Regulation (GDPR) (EU) 2016/679. If personal data of people under the age of 18 needs to be collected, written consent forms will be sought from their parents / legal guardians. The data will be collected and used only for the purpose for which they are stated in the consent forms. Staff members who are working with children and need to collect their data must refer to the Data Protection Policy and to the General Data Protection Regulation (GDPR) (EU) 2016/679. Caminos does not share the collected data with any other entity outside of the respective purpose stated in the consent forms.

Any staff who collects or otherwise has access to personal data of participants during their research is required to sign a declaration of confidentiality before being given such access.

All publications have to be in line with the project's Child Protection policy before being made public.

Any disclosure of private information that could identify participating minors requires written consent by their legal guardians and is subject both to International, European and [National] law as well as Article III of the UNCRC. This is neither restricted by type of media nor by type of publication, as long as it concerns private data of the minors.

All data collected will only be collected if strictly necessary to ensure the quality of the research and will only be collected as part of specific activities for specific purposes. The usage of the data is thus restricted to within the scope and duration of the project activities it was gathered for. Data will only be collected with the expressed consent of

both minor and their legal guardian and access to this data will only be handed to employees which follow the code of conduct and signed the declaration of confidentiality. This will be handled in accordance to all applicable legal requirements.

Photography, Videos and Use of Children's Images

Asociación Caminos recognises the importance of protecting the privacy, dignity and safety of children and young people in relation to photographs, videos and other forms of visual documentation.

The following principles must be respected:

- Written consent from parents or legal guardians must be obtained before taking or publishing identifiable photographs or videos of children, where required by applicable legislation. Children must also be informed about the purpose of the photography or recording in an age-appropriate manner, and their wishes must be respected.
- Images and recordings must never be taken or used in a way that could expose children to harm, embarrassment, humiliation or inappropriate attention.
- Photographs, videos and other identifiable material may only be used for the specific purposes for which consent has been obtained.
- Images and recordings must be stored securely and only accessed by authorised persons.
- The publication or sharing of images through websites, social media, project publications or other communication channels must comply with the organisation's data protection procedures and the applicable consent requirements.
- Staff members, volunteers and collaborators must not use personal devices or private social media accounts to share images or recordings of children for purposes unrelated to their authorised activities.

Any concerns regarding the inappropriate use, sharing or publication of children's images must be reported in accordance with the reporting procedures established in this policy.

8. Reporting and Responding to Safeguarding Concerns

Employees will regularly be re-briefed on this policy and their duties and responsibilities. New employees will be introduced to these prior to being admitted to project work with the data.

All staff members, interns, volunteers and external collaborators of Asociación Caminos have a responsibility to report any suspected or actual cases of child abuse, neglect, exploitation, inappropriate behaviour or other safeguarding concerns.

All concerns must be taken seriously and handled promptly, confidentially and with the best interests of the child as the primary consideration.

Receiving a Disclosure

If a child discloses information about abuse or harm, the person receiving the disclosure must:

- Listen carefully and remain calm, allowing the child to express themselves without interruption.
- Take the child's concerns seriously and reassure them that they have done the right thing by speaking up.
- Avoid asking leading questions or attempting to investigate the situation.
- Never promise absolute confidentiality, but explain that the information will only be shared with people who need to know in order to protect them.
- Ensure that the child is not left in an unsafe situation.

Reporting a Concern

Any suspicion, disclosure or incident involving a child must be reported as soon as possible to the designated person responsible for child protection within Asociación Caminos.

The designated contact person is: Daniel Pittl, pittl.d.caminos@gmail.com

If the concern involves the designated contact person, or if that person is unavailable, the concern must be reported to another appropriate member of the organisation's management.

In cases of immediate danger or serious risk to a child, the relevant emergency services or competent authorities must be contacted without delay. Internal reporting must never prevent or delay urgent protective action.

Documentation and Follow-up

All reported concerns must be documented in a factual and confidential manner. Records should include the date, nature of the concern, relevant observations, information provided by the child or other individuals, and any actions taken.

The designated person responsible for child protection will coordinate the appropriate follow-up measures, including assessing the situation, ensuring the child's immediate safety and contacting relevant authorities or child protection services where necessary.

Staff members, volunteers and collaborators must not conduct their own investigations, confront the alleged perpetrator or share information about the incident with unauthorised persons.

Protection and Confidentiality

The identity and privacy of the child, the person reporting the concern and any other individuals involved must be protected throughout the process.

Any necessary protective measures must be taken to prevent further harm. Where a staff member, volunteer or collaborator is suspected of violating this policy, appropriate precautionary measures may be taken, including temporary suspension from activities involving children, pending further assessment.

Should any staff member, volunteer or other collaborator be found to be in breach of the Code of Conduct or Child Protection Policy, their involvement in any project activities and access to data will be suspended pending investigation, internally or by law enforcement, depending on the severity of the accusation. In case of a proven transgression, Asociación Caminos will take disciplinary action, including but not limited to the immediate termination of the working relationship.

All cases must be handled in accordance with applicable national legislation and the principles of the UN Convention on the Rights of the Child.

Children's Rights Training

All staff, volunteers and other collaborators involved in the project efforts will receive training on Children's Rights (including the UNCRC and national legislation), the proper interaction with minors and the proper protocol on how to identify, report and respond to sexual abuse.

The training programmes are based on existing resources and on the programmes already developed through relevant projects.

External collaborators and associates who may come in contact with children and young people in the fulfilment of their tasks as assigned by Asociación Caminos will participate in the same child abuse prevention training.

9. Cooperation with Other Organisations and Agencies

The selection of partners shall take into account the child protection history of the Partner Organisation.

Asociación Caminos reserves the right to conduct a reference check on the Partner's previous history related to child protection and its policies towards children.

Asociación Caminos will not tolerate any impropriate communication towards children.

A clear statement related to child protection and the zero-tolerance policy of Asociación Caminos in relation to child abuse and inappropriate behaviour shall be included in the form for organisations wishing to become partners of Asociación Caminos.

Asociación Caminos must take a serious action towards any partner convicted for child abuse during the implementation of its projects/programs.

Approved by



Angela Pittl
President of Asociación Caminos

In effect from 01.01.2026.

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