

# **CHILD AND ADOLESCENT PROTECTION POLICY**

## OF CEPS PROJECTES SOCIALS



CEPS Projectes Socials




**The ASSOCIACIÓ PER LA CREACIÓ D'ESTUDIS I PROJECTES SOCIALS (Associació CEPS) is a non-profit association that was founded in 1994 and employs approximately 230 professionals, mainly in Catalonia and Spain, with projects developed in Latin America and Europe. Our organisation's mission is to facilitate people's access to the social and cultural capital of a community through citizen empowerment and the promotion of social cohesion and equity, with a transformative approach.**

CEPS association is responsible for the management and implementation of community development programmes with a clear preventive vocation and with special emphasis on socio-educational projects for children, young people and adults, continuous training for professionals and the research and development of new practices.

Based on a strategic yet social vision of new technologies and social networks, we also promote new avenues for local and international participation. Evaluation and creativity blend into inspiring solutions for the community.

The association ensures that all necessary measures are taken to protect the children and young people in its care or involved in its activities from harm. This Child and Adolescent Protection Policy sets out the position, role and responsibilities of the association and clarifies what is expected of all those involved in the association.

<b>TITLE:</b>	CHILD AND ADOLESCENT PROTECTION POLICY.
<b>Date of approval:</b>	01/10/23
<b>Date of approval of the first version:</b>	8/3/2018
<b>Approval body:</b>	Governing Board.
<b>Validity:</b>	30/09/23
<b>Objectives:</b>	<ul style="list-style-type: none"> <li>· To analyse the elements of our organisation's work from the perspective of possible risks to children and adolescents and ensure their protection.</li> <li>· To have a range of actions in place to prevent and mitigate risks to children.</li> <li>· To guarantee that the professionals and people who participate in our organisation's activities are trained in child protection.</li> <li>· To detail the procedures and protocols of action in possible cases or situations of child neglect.</li> <li>· To have appropriate indicators in place to monitor the progress of objectives designed to protect children.</li> <li>· To ensure that the multidisciplinary team has optimal working conditions to guarantee the development and protection of every child.</li> </ul>
<b>Members of the working group:</b>	<ul style="list-style-type: none"> <li>· Xavier Puig (Director of CEPS Projectes Socials).</li> <li>· Luis F. Suárez (Director CRAE En Polzet).</li> <li>· Laila Sánchez (Coordinator of CaixaProinfància El Vendrell).</li> </ul>

<b>Person responsible for protection in the entity:</b>	<p>Management team responsible for each programme, service and/or project:</p> <ul style="list-style-type: none"> <li>· Residential centres for educational action.</li> <li>· Socio-educational intervention services.</li> <li>· Nursery schools and family support services.</li> <li>· Specialised training programmes with young people (UECS and PFI).</li> <li>· Community programmes with young people.</li> </ul>
<b>Scope:</b>	<p>We are committed to ensuring that this policy is recognised, disseminated and respected by the different professionals who work in the organisation and/or collaborate with it, regardless of their position in the organisational chart and their functions.</p> <p>In this way, this policy will be addressed to all professionals in the organisation with the aim of preventing and responding to any type of violence that may occur</p>
<b>Related documents:</b>	<ul style="list-style-type: none"> <li>· <a href="#">Organic Law 8/2021, of 4 June, on the comprehensive protection of children and adolescents against violence.</a></li> <li>· <a href="#">Government Agreement 97/2017, of 18 July, by which the Framework Protocol for actions against the abuse of children and adolescents in Catalonia is approved.</a></li> <li>· <a href="#">CEESC: Code of Ethics for Social Educators. Approved 5/11/05.</a></li> <li>· <a href="#">Law 14/2010, of 27 May, on the rights and opportunities of childhood and adolescence.</a></li> </ul>
<b>Communication:</b>	Through the entity's website <a href="https://asceps.org/en/">https://asceps.org/en/</a>
<b>Complaint channel:</b>	<p><a href="#">Lefbvre Centinela</a></p> <p><u>LINK:</u> <a href="https://n9.cl/rquge">https://n9.cl/rquge</a>    <u>QR:</u> </p>

# **INDEX**

- 1. Definitions**
- 2. Declaration**
- 3. Scope**
- 4. Code of Conduct**
- 5. Risk Analysis**
- 6. Personnel Management.**
- 7. Response in Case of  
Concern, Suspicion or  
Incident**
- 8. Dissemination**
- 9. Monitoring, Review and  
Follow-up**
- 10. Annexes**

# 1. DEFINITIONS

**Child, Teenager:** A child is defined as every human being from birth to 18 years of age (definition from the Convention on the Rights of the Child).

**Violence:** For the purposes of the LOPIVI law, violence is understood as any action, omission or negligent treatment that deprives minors of their rights and wellbeing, that threatens or interferes with their orderly physical, psychological or social development, regardless of its form and means of commission, including that carried out through information and communication technologies, especially digital violence. In any case, violence shall be understood to mean:

- Physical, psychological or emotional abuse.
- Physical, humiliating or degrading punishment.
- Carelessness or negligent treatment.
- Threats, insults and slander.
- Exploitation, including sexual violence, corruption, child pornography and prostitution.
- Bullying, sexual harassment and cyber-bullying.
- Gender-based violence.
- Genital mutilation (to humans) for any purpose.
- Forced marriage and child marriage.
- Unsolicited access to pornography.
- Sexual extortion.
- Public dissemination of private data.
- The presence of any violent behaviour in the family environment.

## Types of violence:

Child abuse and mistreatment is defined as the abuse and neglect of children under the age of 18, and includes all forms of physical or psychological abuse, sexual abuse, neglect, negligence and commercial or other exploitation that cause or are likely to cause harm to a child's health, development or dignity, or to endanger the child's survival, in the context of a relationship of responsibility, trust or power. Exposure to intimate partner violence is also sometimes included among forms of child abuse and mistreatment (World Health Organisation).

- **Physical violence:** Includes all corporal punishment and other forms of torture, cruelty or degrading treatment by an adult or another child. Corporal punishment is defined as the deliberate use of physical force against a child in a way that causes, or is likely to cause, pain, discomfort or harm to the child's dignity. It includes hitting with the hand or with an object: with a stick, belt, shoe or brush; slapping, beating, kicking, shaking, biting and burning. It can also include pulling hair or ears, forcing children to stay in uncomfortable positions or forcing them to eat food. Much of the violence enacted against children in the home is for the purpose of punishment and discipline (UNICEF).

- **Psychological violence:** This is often described as psychological abuse, verbal abuse or aggression and emotional abuse or neglect, and can consist of: a) Any kind of persistent and harmful interaction with the child; b) Roughhousing and threats; exploiting and corrupting the child; belittling and rejecting the child; isolating, ignoring and discriminating against the child; c) Neglecting the child's affective needs, mental health, medical and educational needs; d) Insulting, abusing, humiliating, belittling, ridiculing and hurting the child's feelings; e) Subjecting the child to domestic violence; f) Subjecting the child to solitary confinement or humiliating or degrading conditions of detention, and g) Subjecting the child to bullying and hazing by adults or other children through IT and digital means, such as mobile phones or the Internet (cyberbullying) (AEP Asociación Española de Pediatría- Spanish Pediatric Association).
- **Sexual abuse:** Sexual violence is any sexual activity imposed on a child by an adult, protected by criminal law. This includes: a) Incitement or coercion to commit any unlawful or psychologically harmful sexual activity; b) The use of children for commercial sexual exploitation; c) The use of children for the production of images or recordings of sexual abuse; and d) Child prostitution, sexual slavery, the exploitation of children for sex tourism, child sex trafficking (within and between countries), the sale of children for sexual purposes and forced marriage. Sexual activities against children are also considered abuse when the perpetrator is significantly older than the victim or uses his or her power, threats or other means of pressure. Consensual sexual activities between children are not considered sexual abuse if they are above the age limit set by each State (AEP Asociación Española de Pediatría- Spanish Pediatric Association).
- **Neglect:** The repeated failure of a parent or other family member to meet a child's physical and psychological needs for development and wellbeing, such as protecting the child from danger and accidents or obtaining medical, educational and birth registration services when they are able to provide them. The parents of a child who suffers neglectful treatment may be in a favourable socio-economic situation (UNICEF).
- **Bullying:** Bullying is a form of peer violence that consists of behaviour by an individual or a group that is repeated over time to hurt, harass, threaten, scare, frighten or pick on another person with the intention of causing harm. It is different from other aggressive behaviour because it involves an imbalance of power that leaves the victim unable to defend themselves. Cyberbullying is a form of bullying that involves the use of mobile phones (texts, calls, video clips), the internet (email, social networks, instant messaging, chat, websites) or other information and communication technologies to deliberately harass, abuse, insult, threaten or intimidate someone. The peculiarity of cyberbullying is that a single aggression that is recorded and uploaded to the internet is considered cyberbullying because of the possibility of innumerable reproductions and its potentially global audience (Save the Children).
- **Protection:** Article 19 of the Convention on the Rights of the Child states:
  1. Member States shall take all appropriate legislative, administrative, social and educa-



tional measures to protect the child from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, mistreatment or exploitation, including sexual abuse, while the child is in the care of parent(s), legal guardian(s) or any other person responsible for the child.

2. Such protective measures should, as appropriate, include effective procedures for the establishment of social programmes to provide necessary assistance to the child and those responsible for the child, as well as for other forms of prevention and for the identification, reporting, referral, investigation, treatment and follow-up of cases of child mistreatment described above, and, as appropriate, for judicial involvement.

- **Good treatment:** Good treatment is understood as that which, while respecting the fundamental rights of children and adolescents, actively promotes the principles of mutual respect, human dignity, democratic coexistence, peaceful conflict resolution, the right to equal protection of the law, equal opportunities and the prohibition of discrimination against children and adolescents (LOPIVI).
- **Safe environments:** A safe environment is one that respects children's rights and promotes a protective physical, psychological and social environment, including the digital environment (LOPIVI).
- **Organisational child protection** is the responsibility of organisations to ensure that their staff, activities and programmes do not cause harm to children. That is, that they do not expose them to possible mistreatment and abuse, and any concerns about the safety of a child in the community in which they work are properly reported to the appropriate authorities. **HARM:** any action that causes harm, injury, pain or discomfort to a child. **RISK:** a situation in which, due to family, social or educational circumstances, deficiencies or conflicts, the child's personal, family, social or educational development, wellbeing or rights are harmed (Children's Villages).
- **Unprotected:** Continuous physical and/or psychological misconduct that undermines the wellbeing and basic needs of the child.
- **Residential Centres for Educational Action (Centres Residencials d'Acció Educativa CRAE):** The CRAE are institutions for the care and education of children and adolescents (from 0 to 18 years of age) to whom the measure of simple foster care in an institution is applied, in accordance with the measure stated in prior reports by the corresponding and competent technical teams. Their objective is to respond to situations and educational and assistance needs that require technical specialisation in their care and education, as an alternative to the care and education provided by the families of origin (Departament of Social Rights).
- **Socio-educational intervention services (SIS):** Socio-educational resources aimed at children between 4 and 16 years of age. Their aim is to promote the principles of inte-



gration and foster social skills in users. This, in turn, favours children's personal development and stimulates creativity through play.

- **Shared Schooling Unit (UEC):** These are a resource to guarantee the educational attention necessary for students with special educational needs derived from their maladjustment to school environments in centres that provide compulsory secondary education.
- **Training and Insertion Programme (PFI):** These are the first level of qualification within vocational training studies and are assigned to different professional families. PFIs are aimed at young people between 16 and 21 years of age who have not completed compulsory secondary education. They are voluntary studies.

## 2. DECLARATION

### INTRODUCTION

The protection of children and/or adolescents is an area of action that must be an obligation for social organisations and, within the framework of our organisation, in compliance with Organic Law 8/2021 on the comprehensive protection of children and adolescents against violence. At CEPS Projectes Socials we believe that this is a fundamental challenge that we must make visible and face in our daily work.

### VISION IN THE FIELD OF PROTECTION

Bearing in mind that conflicts and violent situations can arise in daily work:

- We want to strive to ensure the wellbeing of all the children participating in our services.
- We understand that they should have a healthy and safe space for physical, emotional and psychological development.
- We believe in good treatment and awareness of all the professionals in our organisation as essential elements of our relationships with children and adolescents.

### INSTITUTIONAL COMMITMENT

As an institution in this area, our commitment is to build a comprehensive child protection policy. The best interests of the child and/or adolescent will mark the content as well as all relevant aspects of child protection.

### PRINCIPLES ON WHICH IT IS BASED

Our child protection policy is based on the following principles:

- Guaranteeing the comprehensive wellbeing of the child.
- All children and adolescents are subjects to their rights.

- Promoting a culture of good treatment and a safe environment shared by all the professionals and collaborators of the organisation.
- Reacting responsibly and appropriately to any situation of violence that may be suffered or evidenced by any child with whom we intervene.
- Acting in the best interests of the child, in compliance with legal regulations.

## POLICY OBJECTIVES

The protection policy is an essential element for promoting an institutional process of generating a culture of child protection in different areas and with various elements. The fundamental objectives of our entity's protection policy are focused on:

- Analysing all the elements of our organisation's work from the perspective of possible risks and child protection.
- Having a range of actions in place to prevent and mitigate risks to children.
- Guaranteeing that all professionals involved in our organisation's activities are trained in child protection.
- Detailing the procedures and protocols of action in possible cases or situations of child neglect.
- Having appropriate indicators to monitor child protection objectives.
- Ensuring that the CEPS Projectes Socials team has the appropriate working conditions to guarantee the development and protection of each child.

## CLOSING

Through this declaration, our organisation expresses its ethical and institutional commitment to the welfare of the children with whom we work, taking the first step in a determined process to guarantee their fundamental rights.

## 3. SCOPE

We are committed to this policy being known, disseminated and respected by the different professionals who work in the organisation and/or collaborate with it, regardless of their position in the organisational chart and their functions.

In this way, this policy will be addressed to all the professionals in the organisation with the aim of preventing and responding to any type of violence that may occur.

Actors involved:

1. Internal actors:
  - Management team/governing body of the entity.
  - Workers.
  - Volunteers.
  - Professionals carrying out internships.
  - Students carrying out internships.

2. External actors:
  - Collaborating entities.

## 4. CODE OF CONDUCT

The main objective of the Code of Conduct is to promote good treatment of children and adolescents by our organisation; as a result, it contains all the necessary criteria for proper behaviour towards children and adolescents on behalf of all the people linked to the organisation.

The Child Protection Policy seeks to guarantee the wellbeing of the children who participate in our activities. Our organisation wants all professionals and other persons collaborating in these activities to develop appropriate behaviours and good treatment toward children.

Its scope of application will be all of the projects carried out by CEPS Projectes Socials, whether or not services are provided in direct contact with children and adolescents.

This is why all people linked to our entity must commit themselves to:

- Assuming a protective component in their role as adults.
- Guaranteeing the privacy and confidentiality of children's personal data.
- Carrying out their task/s with children in a responsible, healthy, respectful and safe manner.
- Conceiving of children and adolescents as the subjects of rights.
- Promoting the creation of violence-free spaces in all settings.
- Improving their education and training in child protection and children's rights.
- Promoting children's participation, where everyone can express their demands or complaints.
- Following the entity's protection recommendations.
- Complying with the entity's protection protocols.
- Respecting children's rights.
- In the event of detecting any suspicious behaviour, reporting it through the channel established in the area of protection.
- Being supportive when a child asks for listening and support. Do not underestimate the situation.
- Meeting their obligation to handle confidential information relating to children and families appropriately.
- Respecting the interpersonal spaces of each child.

The following will not be accepted:

- Discrimination against any child or adolescent on any grounds.
- Uttering any kind of verbal insult or threat against any child or adolescent.
- The mistreatment of any child or adolescent.
- Engaging in any inappropriate physical or communicative exchanges with children or adolescents, whether verbal, physical or sexual in nature.

- Engaging in sexual or romantic relationships with underage children of any gender.
- Encouraging attitudes that incite hatred.
- Accepting behaviour between children or adolescents that fosters power imbalances.
- Making inappropriate verbal or digital comments.
- Being left alone with children or adolescents, except on those occasions that are specifically provided for in the policy.
- Sharing personal contact details: telephone, social networks, etc.
- Transporting children and adolescents by private transport, except in the cases specified in the policy of each service and according to the parameters of the corresponding sector.
- Inappropriate use of social networks.
- Showing differential or favourable treatment to certain children or adolescents, thus favouring the exclusion of others.
- Attempting to generate commercial or business relations with minors.
- Blackmailing children and adolescents with any kind of information.
- Taking images of minors without written consent or in an inappropriate manner.
- Using the images of children or adolescents on personal social networks.
- Making humiliating comments to children or adolescents, whether in front of the group or in private.

Non-compliance and non-commitment to the guidelines of the code of conduct will result in different sanctions depending on the degree of seriousness of the acts. Such classification and application of sanctions shall be governed by the procedures dictated by the labour agreement of reference that is relevant to the worker and/or the service in which the infringement has occurred.

## 5. RISK ANALYSIS

The CEPS Projectes Socials association incorporates as an objective in all its fields of action, programmes, projects, campaigns and activities the necessity of maintaining the integrity of children and adolescents in safe and protected environments.

The staff of CEPS Projectes Socials carries out a systematic risk assessment for the protection of children and adolescents in all its areas of action, and especially in the programmes, projects, campaigns or activities in which it comes into contact with children and adolescents.

Some of the main resources and projects where risk assessment will be carried out include:

- Residential centres for educational action.
- Open centres.
- Nursery schools and family support services.
- Secondary School Support Units (UECS and PFI).
- Open media programmes.

In our organisation, we identify risks, analyse them and establish the steps to be taken to mitigate them.

In this process we will involve the children themselves as much as possible. It will be carried out during the preliminary design of programmes, projects, campaigns or activities, as well as during their formulation phases. Its monitoring and updating will be reflected in the intermediate and final reports of the programmes, projects, campaigns or activities themselves.

This evaluation will lead to the corresponding mitigation strategies that are essential for the prevention of violence and for the promotion of a safe environment and a culture of good treatment towards the children and adolescents participating in the programmes, projects, campaigns and activities of CEPS Projectes Socials.

## 6. PERSONNEL MANAGEMENT

### 1. In recruitment processes:

The recruitment process at CEPS Projectes Socials must ensure that appropriate procedures are followed in order to prevent anyone who does not meet the required conditions from joining the organisation.

That is why all persons linked to the association, and in compliance with RD 1110/2015, employees, trainees and volunteers of CEPS Projectes Socials must present a certificate from the Central Register of Sex Offenders confirming the absence of any related crimes or offences.

The different services of the entity have a welcome programme for new professionals which includes the following sections:

- Justification.
- Activities that the person in charge of the service has to ensure are carried out.
- Annexes, where the minimum technical documentation that the professional must be familiar with will be reported.
- **Suitability:** The agency must recruit those people who best guarantee the protection and good treatment of the children and adolescents we work with, ensuring that the selection criteria include and emphasise the experience necessary for those jobs that involve direct contact with children and adolescents or access to their personal information. These processes include robust checks and balances:
  1. Identity verification.
  2. Request for a certificate stating the person has not committed any sexual offences.

### 2. Staff training plans:

The company has a training plan that is mutually agreed upon with the business committee for the development of training opportunities on a regular, three-year basis.

This training plan, mutually agreed upon with the professionals and their representatives, includes the training to be offered, the number of hours and the frequency of the training.

All parties wish to establish the regulatory and compulsory training that must be carried out

due to different regulatory requirements, and the technical training necessary for the proper development of the profession, as well as to reserve a part of these training sessions to provide individual responses to services that require a specific type of training.

The hours of training shall correspond to those set out in the sectoral agreement applicable to each of the entity's services and/or resources.

This protection policy will be included in training monitoring and evaluation meetings, so that these can be planned for in future training plans.

Training will include monitoring and evaluation mechanisms to ensure that professionals are aware of the code of conduct to be established and of the present protection policy.

## 7. RESPONSE IN CASE OF CONCERN, SUSPICION OR INCIDENT

Our organisation will respond appropriately to any and all situations of lack of protection, suspicions, complaints and communications related to the rights of the children with whom we work. In each of the entity's services, there is an internal protocol on how to act and report in the event of a concern, suspected issue or incident.

All persons within the scope of this policy (see section 3 Scope) have the responsibility and obligation to report if they have reasonable grounds to suspect that a child is suffering harm or is at risk of harm: any concerns, suspicions or incidents relating to behaviour that contravenes the protection policy. Notifications should initially be made to the Service Manager and/or may be made via the following link <https://n9.cl/rquge>. These should be made as soon as possible upon becoming aware of the situation, using the established reporting procedures. Likewise, the person responsible for the service and/or the entity must issue an initial response within 72 hours of receiving the notification, without prejudice to what may be determined in the protocols established by the official institutions that each activity sector may have in this area, with the required regulatory actions being applicable.

No person shall suffer prejudice to their contractual relationship as a result of reporting concerns, suspicions or incidents, unless due investigation shows that there was bad faith in the reporting. Similarly, if a person consciously chooses not to report a concern, suspicion or incident, they may be subject to disciplinary action.

All notifications are accepted and taken seriously.

Concerns, suspicions and incidents can be of the following types:

- Direct observation of a case of violence against a child or adolescent.
- Disclosure or indication, by a third party, of a case of potential violence towards a child

- or adolescent within or outside the entity.
- Breach of this Protection and Good Treatment Policy or its associated procedures by any person within the scope of this policy.
- Knowledge of legal/judicial proceedings related to violence against children and adolescents that have been applied to any person within the scope of this policy.

Our entity's protection policy includes incident report format(s), depending on the service, which will include all the elements of the incident from its beginning to its closure. This will allow for the traceability of the information. This information will be stored in an appropriate manner and only the persons designated as responsible for case management will have access to it.

## 8. DISSEMINATION

Internal dissemination: internally, this protection policy will be evaluated at various meetings to monitor and evaluate the training plans previously agreed upon with the business committee, with the aim of including them in future training plans.

In addition, monitoring and evaluation mechanisms will be established in the different training courses for professionals to ensure that they are aware of the code of conduct and this protection policy.

External dissemination: this will be carried out through the entity's website

<https://asceps.org/en/>

## 9. MONITORING, REVIEW AND FOLLOW-UP

At CEPS Projectes Socials we aim to continuously and regularly evaluate our child protection policy, focusing on all those projects and/or services in which we intervene directly with children and adolescents. Through different actions, new potential risks that may arise will be identified and the corresponding steps will be established with the aim of mitigating or eliminating these risks. On an annual basis, the monitoring committee, together with the person in charge of the protection policy, reviews the incidents that have occurred and extracts possible knowledge that may help to improve the policy and, if necessary, proposes and submits measures to the governing body for modification.

We understand that the work of child protection and child welfare is a process that is affected by external and internal changes. For this reason, every 4 years we will proceed with a review process of the current Child and Adolescent Protection Policy. This process is strategic and must include the participation of the different collective bodies of our entity to contribute the necessary elements that must be inserted in the policy.



## Annex 1.

### **LETTER OF COMMITMENT TO THE CHILD AND ADOLESCENT PROTECTION POLICY OF CEPS PROJECTES SOCIALS.**

The Child and Adolescent Protection Policy of CEPS Projectes Socials aims to guarantee the well-being of all the children who participate in our activities. Our organisation wishes that any professional or other persons who collaborate in these activities develop appropriate behaviour and good treatment with the children involved.

For all these reasons,

D./D.ª.....

with DNI/NIE no. ....

#### **DECLARES THAT:**

- I have received and read the Child and Adolescent Protection Policy of CEPS Projectes Socials.
- I have knowledge of its basic content.
- I received an introductory session from a person responsible for the protection policy with the basic elements of the policy.
- In addition, I have received operational compliance standards and a Code of Conduct.
- I undertake to comply with the measures set out in the policy, the Code of Conduct and the established compliance rules.

I undertake to inform the person responsible for the Child and Adolescent Protection Policy in the organisation of any suspicious situation or any situation of which I am aware that affects the welfare and fundamental rights of any child participating in our organisation's activities.

Signature, place and date

## Annex 2.

### RESPONSIBILITIES OF THE FOCAL POINT AND/OR PROTECTION DELEGATE.

#### **Responsibilities of the Protection Delegate**

- Coordinate the Protection Committee.
- Coordinate the development and updating of the action plan.
- Coordinate the effective implementation and monitoring of the action plan.
- Participate in Protection Committee meetings.
- Receive and manage improvement proposals from the educational team and make them viable.
- Assume responsibility and accountability for the performance of assigned duties.
- Provide advice where necessary.

#### **Prevention and Raising Awareness**

- Guarantee that all CEPS Projectes Socials workers accept their responsibilities regarding the good treatment of children and adolescents.
- Facilitate and encourage all CEPS Projectes Socials staff to be aware of the entity's protection policy.
- Ensure that the procedures for reporting and responding to a situation of violence against children are clear and well-known to all workers and/or collaborators at CEPS Projectes Socials.
- Promote a culture of protection and good treatment of children in our professional and personal lives.
- Promote and facilitate training plans, as well as the implementation and monitoring of the policy.
- Produce a child-friendly version of the materials and work on raising children's own awareness of the topic.
- Plan and conduct safe activities for children and adolescents with the aim of making them aware of the entity's protection policy, and provide counselling when necessary.
- Agree upon training plans with the business committee, with the aim of raising awareness of the entity's protection policy and code of conduct.

#### **Incident management**

- Act as the first point of contact for child and adolescent protection issues and communicate them to the service/resource management team.
- Activate the response mechanism (protection of the child or adolescent, decision on investigation and follow-up, sanctions, etc.).
- Collaborate with local child welfare and/or law enforcement agencies and, to the extent possible, ensure that children and adolescents receive appropriate support.

- Maintain an accurate record of incidents and ensure compliance with data protection.
- Report to the management team on incidents arising on an annual basis and coordinate the executive reports twice a year.

## **TERMS OF REFERENCE OF THE PROTECTION COMMITTEE**

### **1. Objectives**

With the approval of the Policy and Code of Good Treatment of Children and Adolescents (NNA) CEPS Projectes Socials is committed to working for the prevention of abuse and violence through the construction of a culture of protection and good treatment, where interactions with children and adolescents promote their dignity and encourage their full development and welfare in a safe and protective environment.

The purposes of the Good Treatment protection committee are as follows:

- Ensure the implementation, monitoring and adaptation of the policy and the Code of Conduct in the entity.
- Ensure that persons covered by the scope of the policy and the Code of Conduct are informed and trained.
- Systematise and share good practices and lessons learned.
- Support the person responsible for protection in the management of cases of lack of protection or violence towards children and adolescents.

### **2. Framework for action**

The Protection and Good Treatment Committee shall at all times act within the following framework:

Vision, Mission, Values and Principles of the entity:

- Protection policy of the entity CEPS Projectes Socials:  
Through the entity's website <https://asceps.org/en/>
- Commitment to confidentiality within the framework of the protocol/ complaints and response mechanism, as well as during the entire process of case analysis, investigation, response and follow-up.

### **3. Members**

The committee is made up of the following persons:

<b>Name</b>	<b>Position and -area of direction</b>	<b>Role in the committee</b>
Roser Albert	Benchmarker in Protection Programmes - Programme Quality.	Coordination and planning of the committee's work.  Staff and volunteer training.  Protection and Good Treatment Fo- cal Point.
Deli Burset	Technician of Policy  Programmes - Accountabili- ty and Policy.	Support in planning the work of the committee.  Policy advice and process harmoni- sation.  Support on any issues arising from the committee.
Xavier Puig	HR Technician.	Support in planning the work of the committee.  Advice from the HR area.  Support in the field of procedures, labour law, etc.  Support on any issues arising from the committee.

Minutes of the meetings shall be taken on a rotating basis at each meeting.

The composition of the group may vary over time, depending on the evolution of the committee's tasks and the organisational context. The committee may also form working groups at the sub-group level.

Other people in the organisation will also be involved in different processes and working groups. In particular, it will be necessary to support the management or coordination of projects, centres and services in all matters related to the establishment and implementation of complaints and response mechanisms, in accordance with regional laws and seeking harmonisation/coherence at the national level. They should also ensure that the protection policy is implemented as far as selection and recruitment processes are concerned.

#### **4. Functions**

Consistent with the approach based on children's and adolescents' rights, and considering at all times the principles of the Convention on the Rights of the Child, the Committee's proceedings provide for the following:

##### **1. Raising awareness:**

Staff of the entity:

- Raising awareness of the Policy and Code of Conduct through all staff through training workshops and the promotion of responsibilities.
- Strengthening knowledge on child protection.
- Socialising different information and communication strategies and mechanisms.
- Generating continuous spaces of discussion to understand the topics of Protection and Good Treatment (in team meetings, management meetings, etc.).
- Strengthening capacities in strategies that encourage the promotion of the rights and participation of children and adolescents.
- Developing internal campaigns to promote good treatment.

Associated Staff:

- Jointly building a culture of protection and good treatment of children and adolescents.

##### **2. Prevention:**

Staff of the entity:

- Advising on the selection process for new recruits within the framework of the Policy.
- Establishing a process for the reception of new recruits.
- Providing ongoing updates on Policy commitments and signatures of acceptance of the code of conduct.
- Providing tools for the study and analysis of risk factors in the entity's areas of action.
- Promoting training with strategic partners for the care of children and adolescents in

unprotected situations.

- Promoting consultation mechanisms on the implementation of the Policy, Code of Conduct and standards of participation.

Associated Staff:

- Signing their acceptance of the code of conduct.

### **3. Reporting:**

- Establishing strategies to make human resources, staff and project participants aware of the channels for reporting and filing complaints in cases of abuse and violence.
- Ensuring that a transparent, participatory and objective enquiry process is carried out, as well as ensuring confidentiality and proper handling of information.
- Safeguarding all documentation related to the information in order to guarantee the right to privacy of the persons involved.
- Establishing protection mechanisms for the person making the complaint.
- Informing the National Directorate of cases while maintaining confidentiality.
- Establishing coordination and articulation mechanisms with competent administrative institutions of the National Protection System.
- The committee will be considered and held accountable.

### **4. Responding:**

- Always ensuring a timely response to reported situations, whether serious or not, and following up according to the recommendations made by the Committee.
- Ensuring the responsible activation of communication protocols for situations featuring a lack of protection, immediately after there is a suspicious incident and/or complaint.
- Establishing a database for the registration of reported situations, response and follow-up and closing procedures; and establishing a timely systematisation of information according to the response.
- The committee will carry out an informative follow-up process of the cases that are referred to the ombudsman's offices for children and adolescents. In no case will it be a legal follow-up process.

### **5. Resources:**

Technical resources:

- Review of technical materials (tools, guides, procedural manuals, etc.) by internal and external experts (Child Fund Alliance, Keeping Children Safe).
- Layout of materials for external use.
- Development of child-friendly versions of the policy and/or other relevant related documents.
- Development of materials: committee ToRs, revised policy, user-friendly versions of the translated policy, committee action plans, annual reports, etc.

- Training, for the people involved in the aspects that are identified as essential.

Financial resources:

- Provision of services/consultancy for the development of certain technical tasks, if necessary.
- For the realisation of the materials and actions mentioned in the action plan.

## **6. Outline of Operations:**

Regular quarterly meetings will be held via teleconference or face-to-face. The purpose of these meetings will be to follow up on the planned actions, redirect or refocus them if necessary, share learning outcomes, etc.

The Global Focal Point for Protection and Good Treatment may convene additional special or ad hoc meetings if it becomes aware of concerns or possible violations of rights or situations of lack of protection of children and adolescents, in order to analyse and reach agreements based on the best interests of the children and adolescents involved.

Joint work (including the exchange of information, elaboration of minutes, joint generation and review of documents, etc.) will be carried out through the group created for this purpose.

Working groups will also be created at the sub-group level for defined tasks/tools.



## Annex. 3 CASE REGISTER

<b>Details of the informant:</b>	
Name and surname:	
Telephone:	
Job title:	
<b>Details of the child or adolescent concerned:</b>	
Name:	
Relationship to the entity:	
Age:	
<b>Details of the reported person (if applicable):</b>	
Name and surname:	
Relationship to the entity:	
Relationship to the child:	
Details of the incident: (explanation of the case, where it occurred, how, when, etc.; current situation and measures taken so far).	
<b>Witness data (if necessary):</b>	
Name and surname:	
Telephone:	
Relationship with the affected child:	
Relationship with the entity:	
Place and date:	Signature:

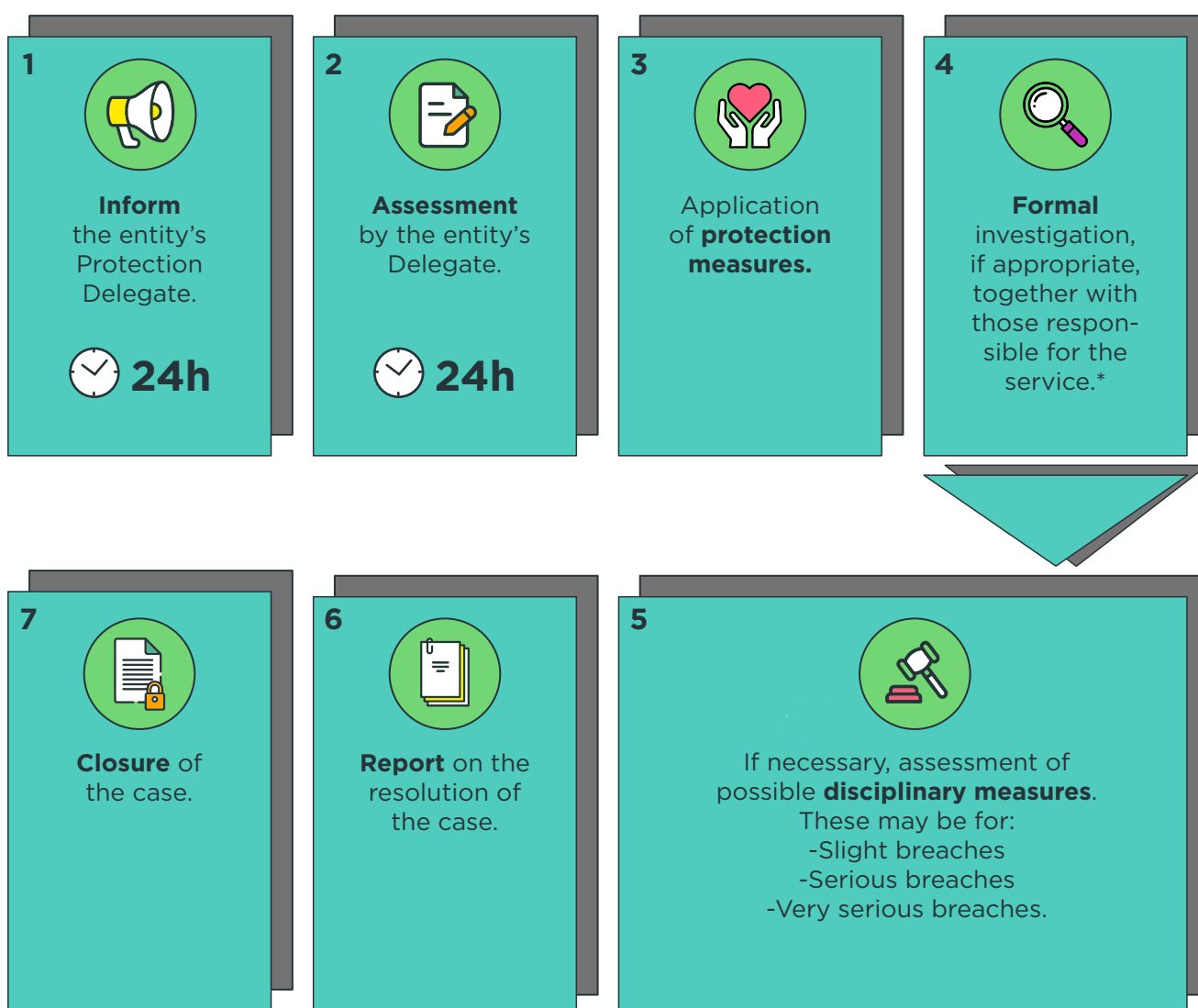
## Annex 4: CEPS Projectes Socials risk analysis and mitigation plan

CENTRAL OFFICES						
DEPARTMENT/ AREA	RISK	ACTION IMPLEMENTED/ PLANNED	INDICATOR	SOURCE OF VERIFI- CATION	RESPONSIBLE ACTOR	RISK LEV- EL
<b>Operations</b>	Use of children's data.	Authorisation document generated, implemented and activated.	100% of families sign it.	Document filed in offices.	Head of Administration and Administrative Services	Medium.
	Recruitment and hiring process.	Authorisation document generated, implemented and activated.	100% of workers submit documentation.	Physical or digital document archived in the offices.	HR Department.	Medium.
	Types and treatment of images and documents.	Training plans. Area of management, documentation and records.	Quarterly area supervision meeting.	Creation of individual files and centre log files.	Responsible educator appointed through the school management.	Low.
	Displacement of children and adolescents.	An action protocol has been generated and is active.	100% of the employees are aware of the internal rules.	Internal Regulations.	Educational team.	Low.
	Staff of external companies.	Recruitment and monitoring of external staff.	Biannual meetings with external employees.	Records kept of the meetings.	Address of the centre.	Low.
<b>Staff</b>	Trainees.	Educational project concerning students doing internships.	100% of students, schools and CRAES sign it.	Document on file at the offices of the reference centre.	Internship tutor and reference of the educational centre.	Medium

Programmes					
Family authorisations for actions.	Authorisation document generated, implemented and activated.	100% of families sign it.	Document filed in offices.	Person responsible for the service, project and/or re-source.	Medium.
Family visits.	Register of family visits.	Report from the referring educator detailing the content of the visit as well as the assessment made.	Document on file at the offices of the reference centre.  Area of management and documentation and records.	Educator responsible for the area.	Medium.
Shared community spaces.	CEPS Projectes Socials protection policy available in shared physical spaces.	All other entities sharing the space are aware of our protection policy.	CEPS Projectes Socials protection policy available in shared physical spaces (document in physical format).	Educator responsible for the group.	Medium.
Coexistence between children and adolescents of different age ranges.	Different actions have been generated to facilitate coexistence between the different groups.	Physical distribution of space.	Internal Regulations.	Management team/ Educational team.	Medium.

# CEPS Association's Child Protection Policy

Protocol for action in the case of  
identified concerns, suspicious  
behaviours or incidents



*\*If it is found that the investigation must proceed, the president of the Business Committee will be informed.*





CEPS Projectes Socials

