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la xixa
CREATIVE SOCIAL INNOVATION



YSI- ACT - Child protection policy





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Nessuna voce di sommario trovata.

1. Introduction

1.1 Project Overview

The YSI-ACT project aims to foster active citizenship among young people through non-formal education and participatory methods, aligning with EU democratic values and promoting human rights. The project seeks to build an inclusive and egalitarian society, transcending barriers of origin, religion, gender, sexual orientation, and capability. Key activities include stakeholder meetings, youth worker training, youth workshops, a youth camp, and youth-led initiatives, implemented at local and European levels.

The expected outcomes are increased youth participation in democratic processes, enhanced human rights advocacy, empowered youth workers, and a more inclusive society.

1.2 Purpose of the policy

This Child Protection Policy establishes a comprehensive framework for safeguarding children, adhering to European Union laws and international conventions. By integrating the child protection acts of Bulgaria, Spain, Finland, and Cyprus, the policy ensures the rights and well-being of children are prioritized through effective prevention and response measures within the YSI-ACT project. It outlines the organization's commitment to child protection, specifying measures, guidelines, roles, responsibilities, and reporting mechanisms to effectively safeguard children and young people.

The mission across all organizations is to foster safe, inclusive, and supportive environments for all participants. Each member of the consortium is committed to child protection in their specific contexts:

- La Xixa is dedicated to providing children and young people with a safe environment in all its programs and activities, including workshops, group facilitations, forum theatre performances, and other creative processes. This policy ensures their protection from harm, abuse, and negligence.
- YEU Cyprus is a non-profit, independent youth NGO in Nicosia focused on empowering young people. This policy ensures that children and young people in YEU Cyprus projects and activities are protected from abuse, harm, and misconduct, including sexual harassment and bullying while complying with local and European regulations.
- Laurea University of Applied Sciences, primarily educating individuals over eighteen, does not have its own child protection policy but is committed to complying with rules and laws regulating the protection and welfare of children in line with this Child Protection Policy.
- Active Bulgarian Society aligns with the Child Protection Act (CPA) in Bulgaria, emphasizing safeguarding children's fundamental rights in all public spheres. The



CPA prioritizes family-based protection measures and collaborative child protection activities to prevent risks such as child separation and abandonment.

Together, these organizations strive to protect and nurture every child and young person involved in their activities, ensuring their rights and well-being are always upheld.

1.3 Scope of the policy

This policy applies to all persons working with and for La Xixa, YEU Cyprus, LAUREA and Active Bulgarian Society, including staff, volunteers, contractors, and service providers, regardless of their type or duration of involvement in the YSI-ACT Project (CERV-2023-CITIZENS-CIV).

By adhering to these guidelines, the YSI-ACT Consortium strives to create a protective and nurturing environment for every child and young person involved in the project activities.

2. Definitions

2.1 Child

EU laws on child protection are grounded in international conventions, which universally define a "child" as any human being under the age of 18 years.¹ This definition aligns with international standards and is fundamental in shaping policies and legislation to safeguard the rights and well-being of children across the EU. The term "child" in the context of EU child protection laws is defined by the following key pieces of legislation and conventions:

- United Nations Convention on the Rights of the Child (UNCRC)
- Charter of Fundamental Rights of the European Union
- EU Directive 2011/92/EU on Combating the Sexual Abuse and Sexual Exploitation of Children and Child Pornography
- EU Directive 2012/29/EU Establishing Minimum Standards on the Rights, Support, and Protection of Victims of Crime

These legal frameworks collectively ensure a comprehensive approach to child protection, emphasizing prevention, support, and justice for all children.

2.2 Child protection

Child protection according to EU laws refers to the set of measures, policies, and actions aimed at ensuring the safety, well-being, and rights of children.² This involves safeguarding children from all forms of violence, abuse, exploitation, and neglect, and providing support to promote their development and well-being. Key elements of child protection within the EU legal framework include:

¹ See Art.1 of the [United Nations Convention on the Rights of the Child \(UNCRC\)](#)

² See Art.24 on the rights of the child, of the [Charter of Fundamental Rights of the European Union](#)



- **Prevention of Harm:** Measures to prevent violence, abuse, exploitation, and neglect of children. This includes raising awareness, education, and creating safe environments for children both online and offline.³
- **Provision of Support:** Ensuring that children who are victims of violence, abuse, exploitation, or neglect receive the necessary legal, medical, and psychological support. This includes specialized services tailored to the needs of children.
- **Ensuring Rights and Best Interests:** Upholding the rights of children as enshrined in the Charter of Fundamental Rights of the European Union and the United Nations Convention on the Rights of the Child (UNCRC). This includes the principle that the best interests of the child must be a primary consideration in all actions concerning them.
- **Access to Justice:** Guaranteeing that child victims have access to justice, including legal representation and child-friendly judicial procedures.
- **Protection in Specific Contexts:** Addressing specific issues such as trafficking, sexual exploitation, and online risks, and implementing measures to protect children in these contexts.
- **Coordination and Cooperation:** Facilitating coordination and cooperation among Member States, and with relevant international organizations, to enhance child protection efforts and share best practices.

2.3 Abuse

- **Physical Abuse** is the intentional use of physical force that results in injury, harm, or potential for injury. This includes hitting, shaking, burning, or otherwise causing physical harm.⁴
- **Sexual Abuse and Exploitation** is the involvement of a child in sexual activities they cannot understand, are not developmentally prepared for, or violate social taboos. This includes both contact (e.g., molestation, rape) and non-contact (e.g., exposure to pornography).⁵
- **Emotional Abuse** involves behaviours that harm a child's self-worth or emotional well-being. This includes verbal abuse, constant criticism, threats, rejection, and withholding of love, support, or guidance.⁶
- **Neglect** definition is the failure to meet a child's basic physical, emotional, educational, and medical needs. This can include inadequate supervision, and failure to provide necessary food, shelter, education, and medical care.⁷
- **Trafficking and Exploitation** are defined as the recruitment, transportation, transfer, harbouring, or receipt of children for exploitation. This includes forced labour, prostitution, and other forms of exploitation.⁸
- **Online Abuse and Exploitation**, that occurs through digital platforms, including cyberbullying, online grooming, and exposure to harmful content.⁹

³ See Art.14 on the right to education of the [Charter of Fundamental Rights of the European Union](#)

⁴ See [EU Directive 2012/29/EU](#) on the protection of victims of crime

⁵ See Art.3 on Definitions of the [EU Directive 2011/93/EU](#)

⁶ See Art.19 of the [United Nations Convention on the Rights of the Child \(UNCRC\)](#) and the [EU Directive 2012/29/EU](#)

⁷ See Art.19 of the [United Nations Convention on the Rights of the Child \(UNCRC\)](#)

⁸ See the [EU Directive 2011/36/EU](#)

⁹ See the [EU Directive 2011/93/EU](#) and the [GDPR](#)



- **Bullying and Peer Violence**, defined as aggressive behaviour among peers that involves a real or perceived power imbalance. This includes physical violence, verbal harassment, and social exclusion.
While specific directives may not address bullying directly, it is considered under broader child protection policies and initiatives aimed at ensuring safe educational and social environments for children.
- **Child Labour** involves the employment of children in work that is mentally, physically, socially, or morally dangerous and harmful to children and interferes with their education.¹⁰

3. Policy principles

3.1 Best interest of the child

The principle of the "best interest of the child" is a fundamental cornerstone in the child protection frameworks across Europe, harmonizing international, EU, and national laws to ensure a unified approach to safeguarding children's rights.

At the EU level, the Charter of Fundamental Rights underscores this principle, mandating that the best interests of children must be a primary consideration in all actions involving them. This commitment is mirrored by the United Nations Convention on the Rights of the Child (UNCRC), which has been ratified by all EU member states and similarly asserts that the best interests of the child should guide all decisions affecting them.¹¹

National laws within the EU, such as Spain's Organic Act 8/2021¹², Bulgaria's Child Protection Act¹³, Finland's Child Welfare Act Amendment¹⁴, and Cyprus's The Children Law¹⁵, reflect this international commitment by implementing protective measures that prioritize children's safety, well-being, and rights. These laws ensure immediate and effective action against abuse, provide supportive measures for children in substitute care, and promote a nurturing environment through family and community support.

By integrating these principles into a cohesive Child Protection Policy, partner countries can offer comprehensive and consistent protection, ensuring that every child's individual needs and rights are respected and safeguarded holistically in the framework of the YSI-ACT project.

3.2 Non-discrimination

This Child Protection Policy is grounded in the principle of non-discrimination. It ensures that every child receives equal treatment and protection, regardless of their

¹⁰ The EU adheres to international standards such as those set by the International Labour Organization (ILO) and has regulations and directives in place to prevent child labour.

¹¹ See Art.1 of the [United Nations Convention on the Rights of the Child \(UNCRC\)](#)

¹² See the Preamble and Art.12 of the [Spanish Organic Act 8/2021](#)

¹³ See Art.3 of the [Child Protection Act](#) (Bulgaria)

¹⁴ See [Finland's Child Welfare Act Amendment](#)

¹⁵ See [Cyprus Child Protection Law](#)



background¹⁶. By harmonizing these international and national frameworks, this policy reinforces the imperative to prevent all children from discrimination, thus fostering an environment where every child, irrespective of origin, religion, gender, or any other status, can thrive and be safeguarded.

3.3 Active participation

In addition, the policy promotes the active participation of children in decisions affecting their lives¹⁷. Encouraging and respecting the views of children aligns with the principles emphasized in national and international laws, ensuring that their voices are heard and considered in all relevant matters. This approach not only empowers children but also contributes to more effective and responsive child protection measures, reflecting a commitment to inclusivity and respect for the individuality and agency of every child under the policy's jurisdiction.

4. Roles and Responsibilities

To effectively implement and uphold this child protection policy, clear roles and responsibilities are essential for all involved parties. These roles encompass the commitment of project staff and volunteers.

Each group has specific duties that contribute to creating a safe and supportive environment for children, ensuring that the principles of non-discrimination and the best interests of the child are consistently upheld across all participating countries.

4.1 Project Staff and Volunteers

Project staff and volunteers play a crucial role in implementing child protection standards. Their responsibilities include ensuring that all interactions with children are conducted in a safe and respectful manner, adhering to the principles of non-discrimination and the best interests of the child. They are required to implement child protection policies and practices, including recognizing signs of abuse, understanding reporting procedures, and fostering a supportive environment for children.

Additionally, staff and volunteers must adhere to strict codes of conduct that prohibit any form of abuse, neglect, or exploitation, ensuring that all activities and interventions are aligned with the guidelines set forth by this policy.

4.2 Partners and Stakeholders

Project partners and stakeholders are integral to the success of this policy, particularly in ensuring a coordinated approach across Spain, Cyprus, Bulgaria, and Finland.

¹⁶ See Art.24 of the [Charter of Fundamental Rights of the European Union](#) and the [Spanish Organic Act 8/2021](#)

¹⁷ See Art.23 of the [United Nations Convention on the Rights of the Child \(UNCRC\)](#), Art.6a of the [Child Protection Act](#) (Bulgaria)



Their responsibilities include actively participating in the development and implementation of the policy, sharing relevant information and resources, and aligning their practices with the established child protection standards. Partners and stakeholders must collaborate to ensure consistent application of the policy and engage in regular communication to address cross-border issues. By fulfilling these responsibilities, they contribute to a unified strategy that enhances child protection across different jurisdictions and ensures a comprehensive response to the needs and rights of children.

5. Safe recruitment and training

The YSI-ACT project partners must implement robust safe recruitment and training practices for the correct implementation of this policy and aligning with the key legal frameworks upon which the policy is based.

5.1 Recruitment Procedures

All staff and volunteers must undergo thorough background checks and vetting processes to ensure they are suitable to work with children. These procedures are designed to prevent individuals with a history of abuse or misconduct from engaging in child-related roles, thereby safeguarding children's rights and well-being.¹⁸

5.2 Training and Awareness

All staff and volunteers will participate in mandatory child protection training. This training encompasses recognizing signs of abuse, understanding reporting mechanisms, and fostering a safe and supportive environment. Such training is essential for ensuring compliance with the related international and national legal frameworks, which emphasize the need for well informed and prepared personnel in child protection efforts.¹⁹

6. Code of Conduct

The Code of Conduct within this policy outlines clear expectations for behaviour and provides a framework for maintaining a safe and respectful environment for children, in alignment with international and national standards.

6.1 Appropriate Behaviour

All interactions with children must be conducted with respect, empathy, and professionalism, ensuring their safety and well-being²⁰ which includes fostering

¹⁸ See Art.24 of the [Charter of Fundamental Rights of the European Union](#), the [Spanish Organic Act 8/2021](#)

¹⁹ See Art.19 of the [United Nations Convention on the Rights of the Child \(UNCRC\)](#),

²⁰ See Art.24 of the [Charter of Fundamental Rights of the European Union](#), the [Spanish Organic Act 8/2021](#) and Art.2 of the [United Nations Convention on the Rights of the Child \(UNCRC\)](#),



supportive relationships, respecting personal boundaries, and adhering to the non-discrimination mandates.

6.2 Unacceptable Behaviour

Actions such as physical or emotional abuse, exploitation, and neglect are unacceptable, including any form of harm or coercion. Through this policy, the YSI-ACT Consortium stresses the commitment to safeguarding children from such practices, consistent with the principles set forth in EU, international, and national legal frameworks. By setting these standards, the Code of Conduct ensures that all personnel uphold the highest levels of integrity and responsibility in their interactions with children.

7. Reporting and Responding to Concerns

7.1 Reporting Mechanisms

Reporting mechanisms are designed to ensure that any concerns or incidents involving child protection are addressed promptly and effectively.

This framework establishes clear, accessible procedures for reporting suspected abuse, neglect, or any other issues affecting a child's safety. Staff and volunteers are trained to recognize signs of abuse and are provided with specific instructions on how to report concerns through established channels.²¹ Related laws emphasize the need for reliable systems to protect children's well-being. La Xixa is designated as the principal entity responsible for disseminating this Child Protection Policy. The consortium partners hereby commit to the thorough and correct implementation of this policy and assume the obligation to diligently collect and report all information pertaining to any breaches thereof directly to La Xixa. Furthermore, by endorsing this policy, each partner commits to adhering to their respective national laws concerning child protection while simultaneously taking into account both international and European Union regulations relevant to the subject matter. These procedures ensure that all reports are documented accurately and escalated to appropriate authorities.

Reporting Mechanisms are structured systems for addressing child protection concerns effectively.

They include:

- Designated Reporting Channels: Each partner commits to reporting any breach of national, EU, or international regulations in accordance with the guidelines outlined in their respective child protection policies. Additionally, each entity must designate a representative responsible for ensuring the implementation of the policy principles.

²¹ See the [Spanish Organic Act 8/2021](#), Art. 24 of the [Charter of Fundamental Rights of the European Union](#), and the [United Nations Convention on the Rights of the Child \(UNCRC\)](#), and the [Child Protection Act](#) (Bulgaria)



- Training and Awareness: Education for staff and volunteers on recognizing and reporting concerns.
- Documentation and Tracking: Keeping accurate records of reports and actions taken, with regular monitoring and evaluation.
- Legal and Ethical Compliance: Adhering to relevant laws and standards, such as the EU Charter and the UNCRC, to ensure effective and lawful practices.

7.2 Response Procedures

Response procedures involve the systematic steps that must be taken once a report is made. This includes:

- The immediate assessment of the reported concern, conducting a thorough investigation, and
- Implementing protective measures to ensure the child's safety.

The response procedures are designed in accordance with Finland's Child Welfare Act Amendment and Cyprus's The Children Law, which mandate prompt and serious attention to reported concerns. This systematic approach ensures that all necessary actions are taken to protect the child, including involving child protection services and law enforcement if needed. The procedures also outline the follow-up steps to monitor the situation and support the child throughout the investigation and beyond.

7.3 Confidentiality

Confidentiality is a critical component of the reporting and response process. The policy emphasizes the importance of maintaining confidentiality to protect the privacy and dignity of all individuals involved, particularly the child. Information related to reports and investigations is kept secure and disclosed only to those with a legitimate need to know. This practice is essential for safeguarding the child's rights and aligns with the legislative requirements across the participating countries, ensuring that sensitive information is handled with the utmost discretion. By safeguarding confidentiality, the policy helps to build trust in the reporting system and encourages individuals to come forward with concerns without fear of undue exposure or retaliation.

8. Communication and Media Use

8.1 Consent

Obtaining consent is a fundamental aspect of using children's images and information in any media or communication. This Child Protection Policy mandates that explicit consent must be secured from both the child and their guardians before using photographs, videos, or any personal details in publications, websites, or social media. This practice aligns with Article 24 of the EU Charter and the UNCRC, which emphasize the protection of children's rights and privacy. Consent procedures must be clear, documented, and informed, ensuring that all parties understand how the information will be used and for what purpose. This approach is consistent with Spain's Organic Act 8/2021 and other national regulations, which stress the importance of safeguarding children's data and privacy.



8.2 Appropriate Use

Guidelines for the appropriate use of children's images and information are essential to protect their dignity and well-being. The policy outlines that images and information should be used in a manner that is respectful, non-exploitative, and aligned with the child's best interests. This includes avoiding any portrayal that could be deemed harmful or misleading, and ensuring that content is used solely for the purposes for which consent was granted. These guidelines reflect the principles of non-discrimination and respect found in Bulgaria's Child Protection Act, Finland's Child Welfare Act Amendment, and Cyprus's The Children Law. By adhering to these guidelines, the policy ensures that the use of children's images and information upholds their rights and safeguards their privacy.

9. Monitoring and Review

9.1 Monitoring Implementation

Effective implementation of the child protection policy requires ongoing monitoring to ensure compliance and effectiveness. Procedures for monitoring involve regular checks and evaluations of how well the policy is being followed, including assessing adherence to reporting mechanisms, consent protocols, and other key areas. This monitoring process ensures that any issues or gaps are identified and addressed promptly. It is designed to align with the standards set by the EU Charter and UNCRC, which emphasize the need for rigorous oversight in child protection practices. Regular monitoring helps to maintain the integrity of the policy and ensures that all protective measures are actively enforced.

9.2 Policy Review

Regular review and updating of the child protection policy are crucial for maintaining its relevance and effectiveness. The policy must be reviewed periodically to incorporate any changes in legislation, best practices, and emerging issues in child protection. This process involves assessing the policy's impact, soliciting feedback from stakeholders, and making necessary revisions to ensure continuous improvement. This practice aligns with the commitment to dynamic and responsive child protection frameworks as outlined in national regulations such as Spain's Organic Act 8/2021 and Finland's Child Welfare Act Amendment, as well as international standards set by the UNCRC and the EU Charter.

10. Appendix

10.1 Forms and Templates

The appendix includes essential forms and templates such as incident report forms and consent forms. These documents are crucial for standardizing the reporting and consent processes, ensuring that all necessary information is collected and recorded appropriately. Providing these forms helps streamline administrative procedures and



supports effective implementation of the child protection policy, making it easier for staff and volunteers to adhere to established protocols.

10.2 Incident Report Form

Incident report forms for child protection usually include:

- **Basic Information:** Date, time, and location of the incident.
- **Details of the Incident:** Description of the incident, including what happened, who was involved, and any immediate actions taken.
- **Witness Information:** Names and contact details of any witnesses.
- **Reporter Information:** Name and contact details of the person reporting the incident.
- **Follow-up Actions:** Steps taken after the incident, including notifications to authorities and any immediate protective measures for the child.

10.3 Consent Forms

Consent forms for the use of children's images and information typically include:

- **Purpose:** Clear explanation of how the images and information will be used.
- **Duration:** Time period for which consent is given.
- **Rights:** Information on the rights of the parents or guardians, including the right to withdraw consent.
- **Signatures:** Signatures of the parents or guardians, and in some cases, the child if they are of appropriate age to understand.



Appendix

YSI-ACT Incident Report Form (Template)

Date	<i>Date of the incident</i>
Time	<i>Time of the incident</i>
Location	<i>Location of the incident</i>
Description of the incident	<i>Including what happened and who was involved</i>
Immediate actions taken (if any)	<i>Describe any immediate actions taken (if any). Be as detailed as possible.</i>



Follow-up Actions	<i>Steps taken after the incident, including notifications to authorities and any immediate protective measures for the child.</i>
Signature and name of the reporting person	
Date of the report	

YSI-ACT Consent Form (Template)

Purpose	<i>Clear explanation of how the images and information will be used.</i>
Duration	<i>Time period for which consent is given.</i>

Information on the Rights of the Parents or Guardians, Including the Right to Withdraw Consent



Through this document, parents and guardians give their informed consent to the use of their child’s data and are fully aware of their legal rights in relation to this consent. These rights are as follows:

Right to Information: Parents and guardians have the right to receive detailed information about the specific uses of their child’s images and personal information. This includes the purpose, mediums (such as digital or print publications), and the duration for which the data will be used. This is in accordance with the principles of transparency and accountability enshrined in Article 24 of the EU Charter of Fundamental Rights and the UNCRC.

Right to Access: They are entitled to access and review the images and information pertaining to their child to ensure that it is being used in accordance with the consent provided. This aligns with the standards of data access under the General Data Protection Regulation (GDPR).

Right to Correction: Should any information be inaccurate or outdated, parents and guardians have the right to request corrections to ensure the data is current and accurate. This is a fundamental right under GDPR and the child protection laws of Spain, Bulgaria, Finland, and Cyprus.

Right to Withdraw Consent: Parents and guardians can withdraw their consent at any time without any adverse consequences. The process for withdrawal should be clearly outlined, typically involving contacting the organization through a designated channel (such as email or phone). Upon withdrawal, the organization must cease using the child’s data and remove it from any public domains where feasible. This right is protected under the GDPR and is emphasized in Spain’s Organic Act 8/2021 and Bulgaria’s Child Protection Act.

Right to Erasure (Right to Be Forgotten): In conjunction with the right to withdraw consent, parents and guardians can request the complete removal of their child’s data from the organization’s records, subject to certain legal exceptions. This right ensures that data is erased and no longer processed, supporting the child’s privacy and protection, as stipulated by GDPR.

Right to Lodge Complaints: Parents and guardians have the right to raise concerns or complaints regarding the use of their child’s data. The organization must provide contact details for a designated data protection officer or complaints handling body to facilitate this process. This aligns with the child protection and privacy laws across the EU and specific national regulations.

Right to Documentation: Parents and guardians have the right to receive copies of all consent forms and related documentation for their personal records. This ensures that they have a complete understanding and record of the terms under which consent was given.

By ensuring these rights are clearly communicated and upheld, the organization adheres to the highest standards of child protection and data privacy, reflecting the legal frameworks established by the EU Charter of Fundamental Rights, the UNCRC, and national child protection laws across Spain, Bulgaria, Finland, and Cyprus.

Parent or legal guardian signature	
Date	xx/xx/xxxx