Child Protection **Policy**

2026

Child Protection Policy of Fundación Siglo22 - Version 1.0

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DOCUMENT CONTROL	
Organisation	Fundación Siglo22 (PIC 941069848), c/ Eugenio Salazar 5, Planta 1, Oficina 1, 28002 Madrid, Spain
Version	1.0
Adopted by	Board of Trustees (Patronato), decision of 22 October 2026
Signed by	Gema de Pablo González, President of the Board
Entry into force	On the date of adoption
Next review	One year after adoption, or earlier after any serious incident or change in the law
Public URL	https://fundacionsiglo22.org/transparencia
Safeguarding focal point	Nuria de Pablo Sánchez, ndepablo@siglo22.net
Deputy focal point	Ascensión Rodríguez Jiménez, arodriguez@siglo22.net

This policy follows the four Keeping Children Safe (KCS) Child Safeguarding Standards: policy, people, procedures and accountability. It applies Spanish law, in particular Organic Law 1/1996 on the Legal Protection of Minors and Organic Law 8/2021 on the comprehensive protection of children and adolescents against violence (LOPIVI).

1

Policy

1.1 Commitment

Fundación Siglo22 works with children and adolescents in schools, through prevention workshops on equality and gender-based violence, in online training and through digital content. We believe that every child has the right to be protected from all forms of violence, abuse, neglect and exploitation, online and offline. We have zero tolerance for child abuse. We commit to preventing harm to the children we reach, to responding quickly and appropriately to any concern, and to making sure that everyone who works on our behalf understands and shares this responsibility.

1.2 Scope

This policy applies to everyone who acts on behalf of Siglo22, whether paid or unpaid:

- members of the Board of Trustees;
- employees, on any type of contract;
- trainers, facilitators and freelance experts;
- trainees, interns and volunteers, including university students acting as mentors;
- contractors and suppliers whose work involves contact with children or their data;
- partner organisations in projects that Siglo22 leads or co-leads, who must have their own equivalent policy or adhere to this one.

It covers all activities: in-person workshops in schools and other settings, online sessions, digital platforms and content that Siglo22 develops or manages, events, and the handling of children's personal data and images.

1.3 Definitions

- **Child**: any person under 18 years of age, in line with the UN Convention on the Rights of the Child (UNCRC) and Spanish law.
- **Child abuse and violence**: any act or omission that harms or may harm a child's physical, psychological, sexual or social wellbeing or development. This includes physical, emotional and sexual abuse, neglect, exploitation, bullying and harassment, discrimination, and gender-based violence.

- **Online and technology-facilitated abuse**: abuse committed or amplified through digital technologies, including cyberbullying, grooming, sextortion, online harassment, and unwanted exposure to harmful content.
- **Image-based abuse**: creating, sharing or threatening to share intimate or sexualised images of a child, including images manipulated or generated with artificial intelligence ("deepfakes") and "nudification" tools.
- **Safeguarding**: all the measures an organisation takes to make sure that its staff, operations and programmes do no harm to children and that concerns are acted upon.
- **Concern**: any suspicion, disclosure, observation or allegation that a child may be or may have been harmed.

1.4 Principles

- **Best interests of the child**: the child's interests are the primary consideration in every decision (UNCRC art. 3; Organic Law 1/1996, art. 2).
- **Equal protection**: every child has the same right to protection, whatever their sex, gender identity, sexual orientation, origin, disability, religion, social background or any other circumstance. We pay particular attention to children at risk of multiple discrimination.
- **Participation**: children have the right to be heard and to take part in decisions that affect them. We involve children and adolescents in designing and evaluating our activities, in an age-appropriate way.
- **Gender-sensitive approach**: we recognise that girls and boys are exposed to different forms and levels of risk, including gender-based violence, and we take this into account.
- **Shared responsibility and confidentiality**: protecting children is everyone's duty. Information on concerns is shared only with those who need it to protect the child.
- **Duty to report**: in line with LOPIVI (arts. 15 and 16), anyone who becomes aware of violence against a child must report it.

2

People

2.1 Safe recruitment and vetting

Siglo22 applies the following steps to everyone covered by this policy whose role involves contact with children, in person or online, or access to children's personal data:

1. **Role description** that states the level of contact with children and the safeguarding responsibilities of the role.
2. **Interview** that includes questions on attitudes and experience in working with children.
3. **References** from at least one previous employer or organisation, checked before the person starts.
4. **Criminal-record check**: a negative certificate from the Central Register of Sex Offenders (Registro Central de Delincuentes Sexuales y de Trata de Seres Humanos), required for any activity involving regular contact with minors under Article 57 of Organic Law 8/2021 (LOPIVI) and Article 13.5 of Organic Law 1/1996, and regulated by Royal Decree 1110/2015. Foreign nationals, and Spanish nationals who have lived abroad, also provide an equivalent certificate from their country of nationality or residence. No one may start working with children before the certificate has been checked. Siglo22 renews this check every two years and asks people to tell us immediately of any change.
5. **Signature of the code of conduct** (Annex A) before the first activity.
6. **Induction** on this policy before any contact with children.

Certificates are kept confidentially, only for as long as necessary, and in line with data protection law. Where Siglo22 works through partner organisations or universities (for example with student mentors), the partner confirms in writing that its people have completed these checks.

2.2 Training

- All staff, trainers and volunteers receive safeguarding training at induction, covering this policy, recognising signs of abuse (including online and image-based abuse and gender-based violence), the code of conduct, and the reporting procedure.

- Refresher training is held at least once a year.
- The safeguarding focal point receives specialised training.
- Before each project involving children, the team receives a briefing on the specific risks of that project.

2.3 Safeguarding focal point

The Board appoints a safeguarding focal point and a deputy, named in the document control table. The focal point:

- is the first contact for any concern and makes sure each one is handled according to this policy;
- keeps the incident log and the vetting records;
- organises training and makes the policy known to staff, partners, children and families;
- reports to the Board at least once a year and immediately on any serious incident;
- acts as the coordinator of wellbeing and protection referred to in LOPIVI when this applies to Siglo22's activities.

If a concern involves the focal point, it is reported to the deputy or to the President of the Board.

3

Procedures

3.1 Code of conduct

Everyone covered by this policy must:

- treat children with respect and dignity, and use appropriate, non-sexist and non-discriminatory language;
- plan activities so that an adult is never alone with a child out of sight of others. In schools, a teacher from the school is present at all times;
- keep a professional relationship: no physical contact beyond what is appropriate and necessary, no gifts or favours, no meetings outside the activity;
- have no private contact with children online or by phone. All communication goes through official, group or school channels with the knowledge of the school or the family;
- never take, store or share images of children on personal devices or accounts;
- never create, request, share or use sexualised or manipulated images of children, including images generated or altered with artificial intelligence, even for training purposes;
- never use alcohol, drugs or tobacco during activities with children;
- challenge and report any behaviour by others that breaches this code.

Breaches of the code are investigated and can lead to disciplinary measures, the end of the collaboration, and referral to the authorities.

3.2 Reporting and response procedure

If a child tells you something (disclosure): stay calm, listen, and believe them. Do not ask leading questions or investigate. Do not promise to keep it secret; explain who you will need to tell and why. Reassure the child that they did the right thing. Write down what was said, in the child's words, with the date and time, as soon as possible.

Steps and timelines

1. **Immediate danger:** call 112 at once, then inform the focal point.

2. **Same day:** report the concern to the Siglo22 focal point, using the incident report form (Annex B). When the activity takes place in a school, also inform the school's head and its wellbeing and protection coordinator, who will activate the school's protocol.
3. **Within 24 hours:** the focal point assesses the concern and decides on referral. Where there are signs of violence against a child, it is reported to the competent authorities: social services, the police (Policía Nacional, Guardia Civil or regional police) or the Juvenile Prosecutor's Office (Fiscalía de Menores), as required by LOPIVI.
4. **Follow-up:** the focal point records the action taken, supports the child's wellbeing through the appropriate services, and informs the Board.

Useful services: ANAR Foundation helpline for children and adolescents, 900 20 20 10; INCIBE cybersecurity helpline, 017; the Spanish Data Protection Agency's priority channel (Canal Prioritario) to request the removal of sexual or violent content published online without consent.

Anyone can also report directly to the authorities. No one who reports a concern in good faith will suffer any negative consequence.

3.3 Allegations against staff, volunteers or partners

Any concern about the conduct of someone acting for Siglo22 is reported to the focal point, or to the President of the Board if it involves the focal point. The person concerned is removed from contact with children while the matter is looked into. The case is referred to the authorities when there are signs of a criminal offence. Siglo22 does not carry out its own investigation where this could interfere with a criminal investigation. Decisions are recorded and the outcome is communicated to those who need to know.

3.4 Images and personal data

- Siglo22 complies with the GDPR and Organic Law 3/2018 on data protection. Children's data are collected only when necessary, kept securely, and deleted when no longer needed.
- Photos, videos or audio of children are taken only with the prior written consent of the parents or legal guardians, and of the child when they are 14 or older. Consent can be withdrawn at any time.
- Published images do not include children's full names, locations or other details that make them identifiable. Wherever possible we use group images, images from behind, or no images of children.
- Images are taken only with Siglo22 devices or school devices, and stored on Siglo22's secure systems.

- Research data (questionnaires, evaluations) are collected anonymously or pseudonymised, with information adapted to the child's age.

3.5 Online safety

- Digital platforms and content that Siglo22 develops for children are designed with safety by default: no public profiles, no private messaging between users, moderated spaces, and clear ways to report a problem.
- Online sessions with children take place on approved platforms, with a teacher or a second adult present, and are not recorded without consent.
- Activities on topics such as deepfakes, cyberviolence or image-based abuse never use real images of children and include information on where to get help.

3.6 Risk assessment of activities

Before any activity with children, the person in charge assesses the risks (setting, supervision, sensitive content, online components, possible disclosures, children with specific needs) and the measures to reduce them. For workshops on violence, sexuality or emotions, the school is informed in advance, the content is adapted to the age group, and a way is agreed for children to leave the session or ask for support.

4

Accountability

4.1 Responsibilities

- **Board of Trustees:** adopts the policy, appoints the focal point, makes sure resources are available for training and implementation, and reviews the annual report.
- **Management:** makes sure the policy is applied in every project, that vetting and training are completed, and that partners and contractors are informed.
- **Project leads:** carry out the risk assessment of their activities and make sure their teams follow the code of conduct.
- **Everyone covered by the policy:** knows and follows the policy and reports any concern.

4.2 Monitoring and incident log

The focal point keeps a confidential incident log recording each concern, the date, the action taken, any referral and the outcome. The log is kept separately from other records, with access limited to the focal point, the deputy and the President of the Board. The focal point also keeps an up-to-date register of vetting checks, signed codes of conduct and training completed.

Each year the focal point prepares a short report for the Board, with anonymised data on concerns, training, vetting and lessons learned. Feedback from children, schools and families is collected through the evaluation of our activities and used to improve the policy.

4.3 Review

The policy is reviewed every year, and also after any serious incident, a change in the law, or a significant change in Siglo22's activities. Each review is approved by the Board and the new version is published on the website.

4.4 Communication

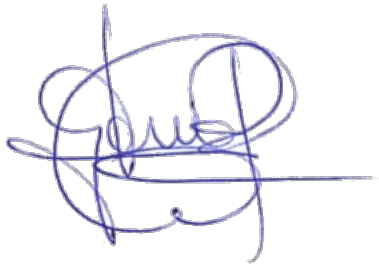
- The policy is published on the Siglo22 website and shared with all staff, volunteers, partners and contractors.
- Schools receive a summary before any activity, including the name and contact of the focal point.

- Children and families receive a child-friendly version, in clear and accessible language, explaining what they can expect from us and how to raise a concern. At the start of each workshop, facilitators explain to the children, in age-appropriate words, who they can talk to if something worries them.

5

Approval

This Child Protection Policy was approved by the Board of Trustees of Fundación Siglo22 on 22 October 2026 and enters into force on that date.



Gema de Pablo González
President of the Board of Trustees, Fundación Siglo22

Madrid, 22 October 2026

A

Annex A. Code of conduct commitment

I, _____ (full name), with ID number _____, acting for Fundación Siglo22 as _____ (role), declare that I have read and understood the Siglo22 Child Protection Policy. I commit to following its code of conduct and procedures, and to reporting any concern about the safety or wellbeing of a child. I confirm that I have provided the negative certificate from the Central Register of Sex Offenders, and I will inform Siglo22 immediately of any change to it.

Place and date: _____

Signature: _____

B

Annex B. Incident report form

INCIDENT REPORT	
Name and role of the person reporting	
Date, time and place of the report	
Project and activity	
Child (first name or initials, age, school)	
What happened or what was said, in the child's own words where possible	
What was observed (behaviour, signs, digital evidence; do not copy or forward images)	
People involved or informed	
Action taken so far	
Received by the focal point (name, date, time)	
Decision and referral (service, date, reference)	
Follow-up and outcome	

C

Annex C. Keeping Children Safe checklist

KCS standard	Where it is covered in this policy
1. Policy: commitment, scope, definitions including online and image-based abuse, principles, adoption and review dates, public URL	Document control; sections 1.1 to 1.4; section 5
2. People: safe recruitment, references, interviews, criminal-record checks, signed code of conduct, induction and regular training, named focal point	Sections 2.1 to 2.3; Annex A
3. Procedures: code of conduct, reporting and response, images and data, online safety, risk assessment, allegations against staff	Sections 3.1 to 3.6; Annex B
4. Accountability: monitoring, incident log, annual review, board responsibilities, communication to children and families	Sections 4.1 to 4.4