

Let Her In International



Child
Protection
Policy

LET
HER
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1. Introduction

The Child Protection Policy is a document outlining the measures and practices Let Her In International Network adopts to ensure the safety and well-being of children. This policy establishes safeguarding commitments, standards of conduct, responsibilities, prevention measures, reporting and response procedures, and monitoring arrangements.

Let Her In is committed to creating a safe environment for all children and firmly believes in protecting, defending and promoting their rights, including their right to be free from all forms of violence, abuse, exploitation and neglect.

The central guiding principle is “Do no harm”, reflecting the organisation’s responsibility to minimise any inadvertent harm arising from its activities, programmes, operations, communications or partnerships.

This policy applies to all children under 18 who participate in, come into contact with, or may be affected by Let Her In’s activities, programmes and operations, whether directly, indirectly, in person or online. It applies to staff, volunteers, trainees, consultants, board members, partner organisations, contractors and other associates acting on behalf of or in cooperation with Let Her In.

Let Her In recognises that safeguarding is an organisational responsibility and that every person involved in the organisation has a role in preventing and responding to concerns about children’s safety.

Guiding principles

- All children have equal rights to protection from harm.
- Everyone has a responsibility to support the protection of children.
- Let Her In has a duty of care towards children with whom it works, comes into contact, or who may be affected by its work and operations.
- Where Let Her In works with partners, it has a responsibility to promote and verify appropriate safeguarding arrangements.
- The best interests of the child are paramount in all safeguarding decisions.
- Children should be listened to and treated with dignity, respect and without discrimination.
- Safeguarding applies to both physical and online environments and to risks arising from programmes, operations and relationships.

2. Policy Statement

As a non-profit organisation, Let Her In is fully committed to empowering both youth and adults through active participation in European educational programs. The organisation directs its efforts towards fostering the development of critical skills such as communication, leadership, and employability. Additionally, Let Her In supports non-governmental organisations (NGOs) and volunteering initiatives that are focused on addressing and resolving social challenges.

Core values that guide Let Her In's mission include:

- **Inclusion**
- **Interculturality**
- **Solidarity**
- **Innovation**
- **Sustainability**

These principles inform and guide the organisation's efforts to enhance the self-esteem and abilities of young people, promote peaceful coexistence between different cultures, disseminate the culture of the nation, and facilitate communication between diverse cultural groups.

In line with its mission, Let Her In is committed to improving global approaches towards the well-being of children, ensuring that every boy and girl is guaranteed the fundamental rights to a life of dignity, protection, development, play, and active participation. Let Her In strives to create immediate and lasting changes in the lives of children by ensuring their rights are upheld and their welfare is prioritized.

In alignment with its mission, Let Her In guarantees the implementation of conduct and practices that ensure the protection and safeguarding of children and young people. These measures are designed to prevent any actions or behaviours that could be deemed inappropriate, potentially abusive, or harmful to children and young people under its care.

Let Her In is resolute in its commitment to providing a safe and secure environment for all children involved in its activities. The organisation acknowledges its duty to protect children from all forms of abuse, violence, neglect, exploitation, or any other form of harm. Let Her In strives to create a climate of trust, mutual respect, and dignity in which children can thrive, learn, and grow in a healthy, inclusive, and child-friendly environment.

In accordance with the Spanish Child Protection Act, **Law N°35 of 2014**, Let Her In reaffirms its adherence to the principles of respecting and guaranteeing the human rights of all children, without discrimination based on ethnicity, religion, race, class, gender, culture, language, legal status, birth order, or any physical or mental condition.

To uphold these principles, Let Her In engages in transparent communication with parents and caregivers. The organisation ensures that all relevant parties are fully informed of its child protection policies and procedures through printed materials and training. Additionally, Let Her In provides resources and encourages a collaborative partnership with families to ensure the well-being, safety, and protection of children.

This Child Protection Policy represents Let Her In's ongoing commitment to fostering a secure, supportive, and nurturing environment for all children involved in educational, social, and cultural activities organised or supported by the organisation.

3. Standard 1: Policy

3.1 Policy commitment

Let Her In is committed to preventing and responding appropriately to any harm to children. The organisation will maintain a child safeguarding policy that reflects children's rights under the United Nations Convention on the Rights of the Child (UNCRC) and relevant national and international safeguarding frameworks.

The policy is approved by the organisation's management body and applies to all staff and associates. It is communicated and made available in an appropriate and accessible manner to staff, volunteers, partners, children, parents and caregivers, and other relevant stakeholders.

Let Her In will ensure that safeguarding is considered in organisational decision-making, programme design and delivery, recruitment, partner cooperation, communications, online activities and other relevant operations.

3.2 Legal and policy framework

Let Her In aligns this policy with applicable Spanish and European child protection legislation and with relevant international instruments, including:

The United Nations Convention on the Rights of the Child (UNCRC), adopted on 20 November 1989.

The Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse (Lanzarote Convention).

Applicable Spanish legislation concerning the protection of children and young people, including requirements concerning persons working with minors.

Relevant European Union and international principles on equality, non-discrimination, privacy, participation and protection from violence.

The organisation will update the legal references when legislation or applicable requirements change.

3.3 Policy communication and accessibility

The policy will be communicated to all relevant personnel during induction and through periodic safeguarding training. Partners and external collaborators whose activities involve children will be informed of the policy and required to comply with applicable safeguarding requirements.

Where appropriate, safeguarding information will be made available to children and caregivers in language and formats that are understandable and accessible to them.

4. Standard 2: People

4.1 Responsibilities and safeguarding focal point

The President of Let Her In has overall responsibility for ensuring the effective implementation of this policy and for monitoring organisational compliance.

Let Her In will designate a Child Safeguarding Focal Point with clearly defined responsibilities and sufficient authority to coordinate safeguarding implementation, receive or coordinate safeguarding concerns, maintain relevant records, support staff and partners, and ensure that concerns are referred to appropriate services or authorities when required.

The organisation will ensure that safeguarding responsibilities are assigned at the appropriate management and operational levels and that personnel know who to contact when they have a concern.

4.2 Recruitment and safer selection

All staff, volunteers and other personnel whose role involves contact with children must undergo an appropriate selection process before starting their duties. This may include verification of identity, professional references, relevant qualifications and legally required criminal record checks.

For activities involving children in Spain, individuals working directly with minors must provide the legally required certificate concerning sexual offences before beginning such

activities. Let Her In will verify and securely retain evidence of compliance in accordance with applicable data protection requirements.

No individual may begin duties involving direct contact with children until the required safeguarding checks have been completed.

4.3 Training and support

Staff and volunteers receive training on child protection, including relevant legislation, recognising signs of abuse, appropriate conduct, reporting and response procedures, online safety and the practical application of safeguarding measures.

Let Her In will provide safeguarding induction before personnel begin relevant activities and periodic refresher training thereafter. Training needs will be reviewed in light of organisational activities, identified risks, incidents and lessons learned.

4.4 Standards of behaviour

All personnel must maintain professional boundaries and treat children with dignity and respect. Adults must not engage in behaviour that is abusive, exploitative, discriminatory, humiliating, threatening, sexually inappropriate or otherwise harmful.

Let Her In will maintain written guidance on appropriate and inappropriate behaviour by adults towards children and, where relevant to its activities, on behaviour between children. Personnel must follow these rules in physical and online environments.

Examples of unacceptable conduct include physical punishment; sexual or romantic behaviour with children; inappropriate physical contact; humiliating or degrading treatment; bullying or cyberbullying; exploiting a child's trust or dependence; unnecessary one-to-one situations that create safeguarding risks; inappropriate digital communication; and sharing images or personal information without appropriate authorisation.

4.5 Partners and external personnel

Any external professional, collaborator or partner organisation involved in activities with children under the scope of Let Her In programmes must comply with the same safeguarding principles and applicable legal requirements.

Let Her In will assess the safeguarding capacity of relevant partners before cooperation where the nature and level of risk justify such assessment. Partner agreements should include safeguarding responsibilities, minimum requirements, reporting obligations and consequences of non-compliance.

Partners are responsible for ensuring that personnel assigned to activities with children meet applicable safeguarding requirements and understand the reporting procedures.

5. Standard 3: Procedures

5.1 Creating a child-safe environment

Let Her In will apply safeguarding procedures across its programmes, operations and partnerships. Safeguarding considerations will be integrated into programme planning, activity design, recruitment, procurement where relevant, partner agreements, communications, online activities and other organisational processes.

5.2 Local safeguarding and protection mapping

Before activities involving children take place, Let Her In will identify the relevant local child protection and welfare arrangements, including applicable legal requirements, competent authorities, social services, emergency services and referral pathways. The level of mapping will be proportionate to the activity and country context.

5.3 Child safeguarding risk assessment

Safeguarding risks will be identified and assessed as part of the organisation's existing risk management processes. Risk assessments should consider, as relevant, the age and vulnerability of participants, activity setting, travel and accommodation, online interaction, adult-to-child contact, one-to-one situations, photography and communications, transport, third-party providers, and risks specific to the local context.

For identified risks, Let Her In will define preventive and mitigating measures, assign responsibility for implementation, and review those measures when circumstances change.

5.4 Reporting concerns and responding to incidents

Let Her In will maintain a clear, accessible and locally appropriate process for reporting safeguarding concerns and responding to incidents.

Anyone involved in Let Her In's activities who has a concern about the safety or well-being of a child must report it promptly through the designated safeguarding reporting route. A person does not need to be certain that abuse has occurred in order to raise a concern.

Reports should be handled confidentially and shared only with people who need the information to safeguard the child and manage the concern. Information must be recorded accurately and securely. Let Her In will not investigate allegations beyond what is necessary to establish immediate safeguarding needs and make appropriate referrals.

Where required by law or where the child's safety requires it, concerns will be referred to the appropriate child protection, social services, law enforcement, emergency or other competent authorities in the relevant country.

The immediate safety and best interests of the child must guide the response. Retaliation against a child, family member, staff member, volunteer or other person who raises a safeguarding concern in good faith is not acceptable.

5.5 Child participation and communication

Children will be given age-appropriate opportunities to express their views about their safety and the activities in which they participate. Let Her In will provide information about how children can raise concerns or seek help in a way that is understandable and accessible to them.

5.6 Online safeguarding, images and personal information

Safeguarding applies to online meetings, digital platforms, messaging, social media and other forms of electronic communication used in connection with Let Her In activities. Personnel must use professional communication channels and avoid inappropriate or unnecessary private communication with children.

Photographs, videos, names, contact details and other personal information concerning children must be collected, used, stored and shared only where there is a lawful basis and appropriate consent or other valid authorisation, and in accordance with applicable data protection requirements.

5.7 Records and confidentiality

Records of safeguarding checks, concerns, incidents, actions and referrals will be stored securely, accessed only by authorised persons and retained in accordance with applicable legal and data protection requirements.

Records of certificates submitted by staff, volunteers and collaborators will be maintained by the designated safeguarding officer/focal point and reviewed periodically to ensure continued compliance.

6. Standard 4: Accountability

6.1 Monitoring implementation

Let Her In will monitor the implementation of this policy and its safeguarding procedures. Monitoring may include reviewing training completion, safer recruitment checks, risk assessments, partner compliance, reported concerns, response actions and lessons learned.

The organisation will communicate relevant progress, performance and lessons learned to appropriate stakeholders, including management and, where relevant, partners, families, children, local authorities and social services, while respecting confidentiality and data protection.

6.2 Learning and continuous improvement

Learning from safeguarding concerns, incidents, near misses, feedback and practical experience will be used to improve policies, procedures, training and risk mitigation measures.

Safeguarding will be reviewed when there are significant organisational or legal changes, after serious incidents, and at regular intervals to ensure that the policy remains appropriate and effective.

6.3 Formal policy review

This policy will be formally reviewed at least every three years. Let Her In will seek an external evaluation or audit of its safeguarding policies and practices at least every three years, taking into account organisational size, activities, risks and available resources.

The management body will approve significant revisions and ensure that the current version is communicated to relevant stakeholders.

7. Procedures

Let Her In has established clear and transparent policies and procedures to protect minors. These guidelines cover supervision, interactions with children both online and offline, and reporting mechanisms.

Let Her In fosters an open and supportive environment where minors feel comfortable to report any worries or discomfort.

Complaints regarding the current policy should be submitted in writing via email, directed to the individual responsible for overseeing the policy.

Employees within the Foundation are expected to approach every complaint concerning a child at risk with the utmost seriousness, professionalism, and responsibility. Any concerns or uncertainties related to the safety and well-being of children must be addressed promptly and with careful consideration.

The organisation actively cooperates with social services and child protection agencies to ensure a timely and effective response to any report.

Lessons derived from practical experience will inform the continuous reassessment of policies and necessary adjustments to child protection measures. Policies and practices aimed at promoting the psychological and emotional development of children shall be periodically reviewed.

A record of all certificates submitted by staff, volunteers, and collaborators will be securely stored by the organisation's designated safeguarding officer. These records will be reviewed annually to ensure continued compliance and renewed documentation where applicable.

8. Definitions

a. Child:

A child is defined as anyone under the age of 18, in line with the UN Convention on the Rights of the Child (1989).

b. Direct contact with children:

This refers to physical presence and interaction with children in the context of Let Her In's activities. It may include meetings, conferences, or direct work with child volunteers. (N.B. these are examples).

c. Indirect contact with children:

This includes scenarios where an individual or organization does not directly interact with children but has access to their information or provides support to organizations working directly with children.

d. Child safeguarding:

Situations where a person does not directly interact with children but may have access to information about children, influence activities affecting children, or support organisations working directly with children.

7.1. Definitions of child abuse

According to the World Health Organisation, "child abuse" or "maltreatment" constitutes 'all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power'¹. A list of various type and exploitation practices are:

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

- e. **Physical abuse and the potential physical abuse** caused by another individual – a child or an adult might include hitting, shaking, throwing, poisoning, burning, drowning, strangling, or any other physical harm of a child, including the falsification of symptoms or worsening the health of the child.
- f. **Sexual abuse:** Includes forcing or coaxing a child to perform sexual acts, regardless of whether the child is aware of it or not. These acts could be physical - either penetrating or non-penetrating - contact. They could also be either involving children into watching or producing pornographic materials, or directing children towards inappropriate behaviour.
- g. **Sexual exploitation of children:** A form of sexual abuse, which coaxes children to perform sexual acts for financial gain, gifts, food, shelter, attachment, social status, or anything the children or their families might need. This form of abuse might be related to child manipulation, befriending, gaining their trust, or supplying alcohol or drugs. Such forms of abusive relationship are based on a power discrepancy, in which the victim's opportunities are extremely limited. Sexual exploitation might be wrongly interpreted by both children and adults as a relationship, based on mutual consent.
- h. **Emotional abuse:** persistent emotional maltreatment that impacts on a child's emotional development. Emotionally abusive acts include restriction of movement, degrading, humiliating, bullying (including cyber bullying), and threatening, scaring, discriminating, ridiculing or other non-physical forms of hostile or rejecting treatment.
- i. **Commercial exploitation** means exploiting a child in work or other activities for the benefit of others and to the detriment of the child's physical or mental health, education, moral or social-emotional development. It includes, but is not limited to, child labour.
- j. **Violence** was defined by the UN Secretary General's Study on Violence as 'physical, psychological (psychosocial), and sexual violence to children through abuse, neglect or exploitation, as acts of commission or omission in direct or indirect forms, that endanger or harm the child's dignity, physical, psychological, or social status, or development.'
- k. **Neglect and negligent treatment:** allowing for context, resources and circumstances, neglect and negligent treatment refers to a persistent failure to meet a child's basic physical and/or psychological needs, which is likely to result in serious impairment of a child's healthy physical, spiritual, moral and mental development. It includes the failure to properly supervise and protect

children from harm and provide for nutrition, shelter and safe living/working conditions.

1. **Criminal exploitation** – children being forced to participate in illegal activities such as forced begging, shoplifting and pickpocketing, cannabis cultivation, drug dealing. A child who is being abused may often experience more than one type of cruelty.

Appendix | Required documentation for working with minors in Spain

All individuals working with children within Let Her In's projects must provide the following documentation:

- A valid Negative Certificate from the Central Registry of Sex Offenders (issued by the Spanish Ministry of Justice). This certificate must be renewed annually.
- Valid identification document (passport, national ID, or NIE).
- Updated curriculum vitae including verifiable references.
- A signed declaration of truthfulness confirming that the information and documentation provided are accurate and up to date.

All required documentation must be verified before the person begins an activity involving minors. Documentation will be stored securely and handled in accordance with applicable data protection requirements.

Appendix | Minimum safeguarding checklist for activities

- ☐ Safeguarding responsibilities and the relevant focal point are identified.
- ☐ Applicable local child protection and referral arrangements have been identified.
- ☐ Safeguarding risks have been assessed and mitigation measures agreed.
- ☐ Required recruitment and safeguarding checks have been completed.
- ☐ Staff and volunteers have received the relevant safeguarding briefing or training.
- ☐ Children and caregivers have accessible information on how to raise concerns.
- ☐ Reporting and emergency contact routes are available to relevant personnel.
- ☐ Partner and external personnel safeguarding responsibilities are confirmed.
- ☐ Online, photography and personal-data safeguards are in place where relevant.
- ☐ Any concerns or incidents are recorded, referred and followed up appropriately.

REFERENCE FRAMEWORK

This policy is aligned with the International Child Safeguarding Standards of Keeping Children Safe, which organise organisational safeguarding requirements under four standards: Policy, People, Procedures and Accountability.

Keeping Children Safe. The International Child Safeguarding Standards.
<https://www.keepingchildrensafe.global/international-child-safeguarding-standards/>