

CHILD PROTECTION POLICY

HEIZE — revised draft incorporating safeguarding observations

Organisation / participant	HEIZE
PIC number	876291793
Policy owner	HEIZE President
Public policy page	https://heize.eus/ohar-legala

Document status and approval

Policy commitment. HEIZE has zero tolerance for child abuse, exploitation, neglect, harassment, grooming, retaliation or any other form of violence against children. Safeguarding is a mandatory responsibility for every representative, employee, contractor, volunteer, trainer, partner and other person acting on HEIZE's behalf.

1. Purpose, scope and principles

This policy applies to all HEIZE activities, including educational and learning activities, workshops, events, meetings, travel, online participation, communications, and activities delivered with partners. It applies whether contact with children is direct or indirect and whether the activity takes place in person or digitally.

- The best interests, safety, dignity, views and rights of the child must be primary considerations in every decision.
- All children have equal rights to protection, without discrimination based on sex, gender, disability, origin, language, religion, family situation, identity or any other status.
- Children's participation is voluntary. Information must be age-appropriate and accessible, and a child may withdraw without penalty.
- No person may investigate an allegation independently, promise secrecy, or place organisational reputation above a child's safety.
- Any person who has a concern must report it in accordance with this policy. Good-faith reporting must not result in retaliation.

2. Definitions

Child — Any person under 18 years of age, consistent with applicable law.

Safeguarding / child protection — The measures taken to prevent and respond to abuse, exploitation, neglect and other harm to children in connection with HEIZE's work.

Abuse / violence — Any act or omission that harms, or risks harming, a child's physical, psychological, emotional, sexual or social well-being or violates their rights. It includes physical, emotional and sexual abuse; exploitation; neglect; bullying and cyberbullying; grooming; discriminatory or degrading treatment; and online abuse.

Neglect — Failure to meet a child's basic physical, emotional, educational, medical or supervisory needs where this causes or risks harm.

Grooming — Building trust or emotional connection with a child to manipulate, exploit or abuse them.

Concern / allegation — Any disclosure, observation, suspicion, report or information suggesting that a child may be at risk of harm or may have experienced harm. Proof is not required before reporting.

Staff / representatives — All employees, governing-body members, contractors, consultants, volunteers, interns, trainers and partner personnel acting for or representing HEIZE.

Child Protection Officer (CPO) — The designated person who receives concerns, coordinates immediate safeguarding action, maintains secure records and makes or coordinates referrals, without replacing statutory authorities.

3. Risk analysis tailored to HEIZE's educational mission

HEIZE's educational activities can create positive learning opportunities, but may also involve adult-child power imbalances, group interaction, personal disclosures, digital communication, photography, travel or contact with partner organisations. Risks must be assessed before each activity and whenever circumstances change.

Risk scenario	Required prevention and control	Responsible / evidence
One-to-one contact or unequal power	Use observable, interruptible settings; avoid isolated rooms; explain any necessary one-to-one contact; record the reason and duration.	Activity lead; activity risk checklist
Workshops, events and group activities	Agree supervision ratios appropriate to age, needs and activity; define arrival/departure and handover arrangements; identify safe spaces and emergency contacts.	Activity lead; attendance and safety plan
Digital learning and messaging	Use approved organisational channels; include parents/guardians where appropriate; no secret or disappearing messages, private social-media contact or personal-device image storage.	CPO / digital lead; communication rules
Photos, video and personal stories	Obtain valid, specific consent where required; seek the child's assent; explain intended use; never publish identifying or sensitive information without lawful basis and safeguards.	Activity lead; consent record
Disclosure of harm or distress	Listen calmly, do not lead or repeatedly question; explain that information may need to be shared to keep the child safe; report promptly.	All staff; incident report
Trips, transport and off-site activity	Complete a written risk assessment; verify supervision, permissions, transport arrangements, emergency contacts and safe collection procedures.	Activity lead; trip checklist
Partner or third-party delivery	Check safeguarding standards, named contacts, reporting routes and responsibilities before the activity; include obligations in written agreements.	HEIZE management; partner due diligence
Exclusion, bullying or discrimination	Set inclusive ground rules, accessible reporting options and a clear response to bullying, harassment and discriminatory conduct.	Activity lead; incident and follow-up record

Before each activity, the activity lead must document likelihood, impact, children who may be particularly vulnerable, mitigation measures, the person responsible and residual risk. If a serious risk cannot be reduced to an acceptable level, the activity must be changed, postponed or cancelled.

4. Code of conduct

Everyone covered by this policy must:

- Treat every child with dignity, respect and fairness; listen to children and take their views seriously.
- Maintain professional boundaries and use transparent, accountable interactions.
- Use age-appropriate language and activities and respect privacy, culture, disability and individual needs.
- Follow supervision, consent, photography, online communication, transport and reporting rules.
- Report any concern, allegation, breach or boundary violation promptly, even if uncertain.

- Cooperate honestly with safeguarding reviews and lawful investigations.

Unacceptable behaviour — strictly prohibited:

- Any physical, sexual, emotional or verbal abuse; exploitation; grooming; neglect; bullying; harassment; humiliation; discriminatory treatment; or threats.
- Corporal punishment, degrading discipline, intimidation, or using educational authority to coerce or control a child.
- Sexualised comments, sexual contact, requesting or sharing intimate images, or any romantic/sexual relationship with a child.
- Seeking unnecessary physical contact, being alone with a child in a hidden or isolated setting, or arranging unauthorised private meetings.
- Private or secret messaging with a child, asking a child to keep interactions secret, or contacting children through personal accounts outside approved arrangements.
- Taking, storing or publishing images, video or personal information without the required lawful basis, permissions and safeguards.
- Offering gifts, money, preferential treatment or opportunities in exchange for attention, secrecy, compliance or personal contact.
- Retaliating against a child, parent, witness or reporter; discouraging a report; concealing an incident; or obstructing a referral.

A breach may lead to immediate removal from child-facing duties, internal disciplinary or contractual action, and referral to competent authorities where appropriate or legally required. Internal action must not delay or replace statutory reporting.

5. Safe recruitment and suitability checks

- Every child-facing role must have a written role description identifying safeguarding responsibilities and expected contact with children.
- Recruitment must include identity verification, application and employment-history review, safeguarding-focused interview questions, and at least two references where practicable.
- Before a person undertakes work involving regular or direct contact with children, HEIZE must obtain and verify the legally required criminal-record certificate, including the relevant certificate concerning sexual offences where Spanish law requires it. Equivalent checks must be considered for relevant overseas residence or work history where lawful and available.
- No person may begin unsupervised child-facing duties until required checks are completed and suitability is documented. Any exceptional interim arrangement must be risk-assessed, time-limited and supervised, and must never override a statutory disqualification.
- Checks must be repeated when required by law, a funder, a contract or a documented risk assessment. HEIZE must not collect or retain more criminal-record data than legally necessary.
- All staff, volunteers and contractors must sign this policy and the code of conduct before starting relevant duties.

6. Training and awareness

Before starting child-facing duties, all relevant staff and representatives must complete induction covering children's rights, definitions and indicators of abuse, professional boundaries, online safety, inclusive practice, responding to disclosures, reporting routes, data confidentiality and emergency action. Attendance and completion must be recorded.

Refresher training must take place at least annually and whenever this policy, the law, activities or identified risks materially change. The CPO must ensure staff know how to access the policy and reporting form. Role-specific training must be provided to the CPO and activity leads. Training records must state the date, content, participants and any follow-up required.

7. Child Protection Officer and governance

The existing declaration identifies HEIZE's President as the person responsible for the Child Protection Officer role. This revised policy proposes that the President, currently named in the declaration as Iñigo Salaberria, serve as CPO only once HEIZE formally confirms the appointment and verifies that the person can act impartially. If a concern involves the President/CPO, the report must go directly to another independent member of HEIZE's governing body and, where appropriate, to external authorities.

- Receive and acknowledge safeguarding concerns; assess immediate safety and coordinate protective action.
- Ensure reports are recorded securely, with restricted access and an audit trail.
- Make or coordinate prompt referrals to statutory services and police where required; never conduct an investigative interview.
- Advise staff and parents/guardians on the process, while protecting the child's privacy and best interests.
- Maintain the risk register, training records, recruitment-check records and incident log.
- Review incidents and near misses, recommend corrective measures, and report anonymised trends to HEIZE's governing body.
- Ensure the policy, child-friendly reporting information and complaint routes are accessible online and in activity materials.

CPO name: Iñigo Salaberria Role: president Dedicated email: heize@heize.eus Telephone: 747427464 Backup contact: koordinazioa@heize.eus

8. Reporting and response procedure

Anyone may report a concern. Staff must not wait for proof or permission from a manager.

1. **IMMEDIATE DANGER:** Call 112 or contact the police/emergency services. Move the child to a safer situation if this can be done safely. Do not confront the alleged perpetrator if doing so could increase risk.
2. **LISTEN AND SUPPORT:** Stay calm, listen without judgement, take the child seriously and reassure them that telling someone was right. Do not promise secrecy, suggest answers, investigate, or ask the child to repeat the account unnecessarily.
3. **REPORT PROMPTLY:** Notify the CPO as soon as possible and no later than the same day. If the CPO is implicated, unavailable or there is a conflict of interest, report to the backup governing-body contact and/or directly to the competent external service.
4. **RECORD FACTS:** Complete the Safeguarding Concern Form as soon as possible, preferably immediately and within 24 hours. Record the child's words as accurately as possible, date/time, observations, people present and actions taken. Separate facts from opinion.
5. **ASSESS SAFETY:** The CPO must review urgency immediately on receipt, decide what protective measures are needed and ensure the child is not left exposed to a continuing risk. Do not delay external referral while completing internal paperwork.
6. **REFER:** Where there is suspicion of violence, a risk to a child, or a legal duty to communicate, refer promptly to the competent child-protection/social-services authority and/or police. The statutory duty to communicate under applicable law takes precedence over internal channels.
7. **ACKNOWLEDGE AND FOLLOW UP:** Acknowledge receipt to the reporter within two working days where contact details are available and it is safe to do so. Tell them what can appropriately be shared, without compromising confidentiality or an investigation.
8. **REVIEW AND CLOSE:** The CPO documents decisions, referrals, safeguards, follow-up and closure rationale. The governing body reviews anonymised lessons learned. Records are retained securely according to the retention schedule and applicable law.

Internal target timelines do not restrict urgent action: immediate danger requires immediate emergency contact; urgent concerns must be referred without delay. No staff member may promise an outcome or conduct their own investigation.

9. Reporting forms and record templates

A. Safeguarding Concern / Incident Form

- Reference number: [assigned by CPO]
- Date/time concern received: _____ Method: _____
- Reporter name and safe contact (if provided): _____
- Child's name / age or date of birth / safe way to contact: _____
- Date, time and location of alleged incident or concern: _____
- What was seen, heard or disclosed? Record the child's words where possible: _____
- People involved / witnesses (only necessary details): _____
- Immediate safety concerns and action taken: _____
- Was emergency service / statutory authority contacted? Who, when, reference: _____
- CPO notified (date/time): _____ Referral decision and rationale: _____
- Consent / information-sharing considerations and lawful basis: _____
- Follow-up actions, owner and due date: _____
- Completed by / date / signature: _____

B. Activity safeguarding risk assessment

- Activity, date, venue, age range and number of children: _____
- Lead and supervising adults / emergency contact: _____
- Risks identified, likelihood, impact and children who may be more vulnerable: _____
- Controls, responsible person and completion date: _____
- Consent, photography, online contact, transport and handover arrangements: _____
- Residual risk and decision to proceed / amend / cancel: _____
- Approved by / date: _____

C. Complaint form (child- and parent-accessible)

- I am: a child / parent or carer / staff member / other (optional): _____
- I would like to tell HEIZE: _____
- What happened, and when? (You can use your own words): _____
- What would help you feel safe now? _____
- How can HEIZE contact you safely? (optional): _____
- You do not need to prove what happened to raise a concern. You may report verbally, in writing, or through a trusted adult.

HEIZE must make accessible versions of these forms available online and in paper form at activities, including a child-friendly version. The final policy webpage must provide a monitored reporting email/telephone route and explain how to complain if the CPO is the subject of the concern.

[Child protection policy \(link\)](#)

10. External referral and support routes

HEIZE must not treat internal reporting as a substitute for statutory reporting. The CPO or any person with a legal duty must contact the competent public authority promptly when required.

- Emergency or immediate danger in Spain: 112. Contact police/emergency services where urgent protection is required.
- Basque Country — Zeuk Esan: call 116 111. The Basque Government describes this as a free, anonymous support service for children and adolescents, including for concerns about violence or bullying. It offers guidance and support; it is not a substitute for emergency services or a formal statutory referral where one is required.

- Basque Country — competent municipal social services and the relevant territorial child-protection service: refer according to the child's place of residence and the current official regional/territorial protocol. HEIZE must insert and maintain the appropriate local contact details before publication.
- Spain — competent child-protection authority and police: contact the relevant regional/territorial child-protection service or police authority in accordance with the applicable protocol and legal duty.

Operational contact list to complete and test before approval: local social services [municipality, phone, email]; territorial child-protection service [territory, phone, email]; police contact [details]; CPO [details]; backup contact [details]. Verify all details periodically and whenever authorities update their services.

11. Complaints mechanism for children and parents

- Children and parents/carers may raise a concern or complaint verbally, by email, using the online form, in writing, or through a trusted adult. A child does not need a parent's permission to raise a safeguarding concern.
- The process must be free, accessible, age-appropriate, culturally and linguistically appropriate where practicable, and available without fear of retaliation.
- Complaints may concern a staff member, activity, decision, breach of this policy or the handling of a previous report. Anonymous complaints will be considered, although follow-up may be limited.
- HEIZE will acknowledge a complaint within two working days where safe contact details are available, assess immediate safety without delay, and provide an update within ten working days where feasible. If more time is needed, the complainant will be told why and when to expect the next update.
- Complaints involving the CPO or the President must be handled by an independent governing-body member or referred externally. A complainant may contact public authorities directly at any time.
- HEIZE must not retaliate against complainants, children, witnesses or reporters. Confidentiality will be respected, but absolute secrecy cannot be promised where information must be shared to protect a child or comply with law.

12. Data protection, privacy and confidentiality

HEIZE must process personal data in accordance with Regulation (EU) 2016/679 (General Data Protection Regulation — GDPR), Organic Law 3/2018 on Personal Data Protection and guarantee of digital rights (LOPDGDD), Organic Law 8/2021 on the comprehensive protection of children and adolescents against violence (LOPVI), and any other applicable EU, Spanish and Basque legislation.

- Collect only data that is necessary for safeguarding, use it only for specified lawful purposes, and document the appropriate legal basis. Do not assume consent is the appropriate legal basis for every safeguarding record.
- Limit access to the CPO and authorised personnel who need the information for protection, legal compliance or case management. Use secure systems and restrict sharing to what is necessary and lawful.
- Explain privacy information in clear, age-appropriate language. Respect children's rights while recognising that information may need to be shared with statutory services to protect them.
- Store incident records separately from general activity records, protect them with appropriate technical and organisational security, and keep an access log where practicable.
- Set a written retention and deletion schedule based on legal duties, limitation periods and safeguarding needs. Do not retain criminal-record certificates or sensitive details longer than permitted or necessary.
- Report suspected personal-data breaches promptly through HEIZE's data-protection process and assess whether notification to the supervisory authority or affected people is legally required.
- Photography, video, mailing lists, online platforms and cross-border transfers must be reviewed for lawful basis, transparency, security and appropriate consent/permissions.

Data protection contact / Data Protection Officer, if appointed: Iñigo Salaberria, heize@heize.eus

13. Monitoring, review and publication

The CPO and governing body must review this policy at least once every 12 months, and sooner after a serious incident, a near miss, a material change in HEIZE's activities, a legal change, or a lesson identified through a complaint or referral. The review date, changes and approving body must be recorded.

HEIZE must publish the approved policy, child-friendly summary, code of conduct and reporting/complaint instructions on its website. The existing declaration identifies <https://heize.eus/ohar-legala> (section 7.7) as the publication location. HEIZE must verify the page is publicly accessible, update it with this approved version and provide the direct link in invitations, activity materials and partner agreements.

14. Legal and policy references

- United Nations Convention on the Rights of the Child.
- Keeping Children Safe — International Child Safeguarding Standards (as referenced in HEIZE's existing declaration).
- Regulation (EU) 2016/679 (General Data Protection Regulation): <https://eur-lex.europa.eu/eli/reg/2016/679/oj>
- Spain, Organic Law 8/2021 of 4 June, on the comprehensive protection of children and adolescents against violence (LOPVI): <https://www.boe.es/eli/es/lo/2021/06/04/8/con>
- Spain, Organic Law 3/2018 of 5 December, on Personal Data Protection and guarantee of digital rights (LOPDGDD): <https://www.boe.es/eli/es/lo/2018/12/05/3/con>
- Basque Government — Zeuk Esan, child and adolescent support service (116 111): <https://www.euskadi.eus/presentacion-zeuk-esan/web01-a2zeukes/es/>
- EU Strategy on the Rights of the Child and the European Child Guarantee, as referenced in the requested observations.

15. Formal adoption and signature

By signing below, the authorised legal representative confirms that HEIZE has formally adopted this policy, will implement the measures described in it, will assign the resources and responsibilities needed for implementation, and will ensure that all relevant personnel are informed of and bound by it. Signature must take place only after all [TO COMPLETE] fields have been resolved or formally assigned.

Name of authorised legal representative	Iñigo Salaberria
Position	President
Signature	
Date of approval	2026/10/14
Organisation stamp (if applicable)	