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## *Child Safeguarding Policy*

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GAIA is a Basque innovation-driven cluster association established in 1983 and based in the Basque Country, Spain.

Its activities are mainly focused on Research and Development, Business Innovation, Digital Transformation, and Sustainable Territorial Development, supporting companies from the ICT, Engineering, and Electronic sectors.

Given the multiple activities it conducts involving young people and children, as target group of tailored workshops, seminars, living labs, and other events or activities curated and organized by GAIA, the company is fully aligned to the Keeping Children Safe International Child Safeguarding Standards, including all four dimensions, namely Policy, People, Procedures, and Accountability.

To this end, it explicitly states its full adherence to these standards by adopting the following policy and committing to respect it in its entirety within the scope of all its activities.

### **1. GAIA principles**

#### **Based on the UN Convention on the Rights of the Child (UNCRC)**

Safeguarding Policy is based on the Convention on the Rights of the Child and reflects the envisaged right of children to protection. All children beneficiaries of GAIA projects activities have the right to have their health, safety and well-being, and their best interest considered as top priority. Children will be valued, respected and understood within the context of their own culture, religion and ethnicity. Children will be listened and encouraged and supported to participate in decisions which affect them, and in the child protection processes.

#### **Based on the Universal Declaration of Human Rights**

GAIA Child Safeguarding Policy is also based on the Universal Declaration of Human Rights. All adult's beneficiaries of GAIA projects activities will be safe, protected, and respected. GAIA will create a safe environment where every beneficiary of GAIA activities will be supported and encouraged to improve the wellbeing, develop their full potential, their personality with the support of the resources available within the organization.

#### **Based on European Union Charter of Fundamental Rights**

GAIA Child Safeguarding Policy is also based on the EU Charter of Fundamental Rights, with particular reference to Art. 24, "The rights of the child", according to which 1. Children shall have the right to such protection and care as is necessary for their well-being. They may express their views freely. Such views shall be taken into consideration on matters which concern them in accordance with their age and maturity; 2. In all actions relating to children, whether taken by public authorities or private institutions, the child's best interests must be a primary consideration.

### **2. GAIA Commitment for Safeguarding Policy**

Safeguarding Policy represents the commitment of GAIA in its obligation to protect children and vulnerable adults from harm, all forms of violence and abuse.

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All GAIA staff is aware that have an essential role and responsibility in ensuring that children and vulnerable adult's beneficiaries are protected, and GAIA team is committed to conduct its activities in a safe manner for the vulnerable adults and ensure protection of children.

All GAIA staff is expected to conduct themselves in a manner consistent with this commitment and obligation. Any violation of the Safeguarding Policy will be treated as a serious issue and will result in actions taken, including disciplinary measures and any legal remedy.

### 3. GAIA Zero Tolerance toward abuse

GAIA staff has an absolute duty to protect children and adults from violence, exploitation and abuse. This duty is imperative and GAIA has zero tolerance towards abuse.

### 4. GAIA Safeguarding Policy Goal

Child Safeguarding Policy is developed to ensure the highest standards of professional behavior and personal practice to ensure no harm occurs in any situation to children and youth during their involvement in GAIA activities.

GAIA is obliged to ensure their operations are 'safe' and therefore adopts and implements these Safeguarding Guideline. With the GAIA Safeguarding Guideline adopted and implemented:

- Children are protected: All children have the right of protection from all forms of violence, abuse and exploitation, based on the UN Convention on the Rights of the Child. GAIA ensures that all its activities, policies, projects are 'child safe'. This means that staff do not represent a risk to children and that activities, policies and practices can be designed and developed in ways that promote the protection of children.
- GAIA staff and its reputation is protected: With Safeguarding Policy in place, GAIA will prevent allegations of abuse, and will protect its staff and its reputation.

In addition, through Safeguarding Policy GAIA will:

- Promote the culture of Safeguarding by 'protecting children', and enabling them to live free from harm, violence and abuse;
- Create an environment where issues of child protection and human rights are discussed openly and are understood between children and adults;
- Creating a framework to deal openly, consistently and fairly with allegations concerning violence and abuse.

### 5. Definitions

*Child* - is defined every human being below the age of eighteen years in line with the UN Convention on the Rights of the Child (1989). In cases when the age of the human being is not fully determined, but there are reasons which imply that the human being in question is a child, the human being will be considered as a child.

*Child Protection* - is a term to describe legislation, standards, guidelines, procedures, actions and measures to protect children from both intentional and unintentional harm. In the context of the Safeguarding Policy, child protection is defined as GAIA duty to make sure that its staff do no harm children, they do not

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expose children to the risk of harm and abuse, and that any concerns that GAIA has about children's safety within the activities and projects in which they work, are reported to the appropriate authorities.

*Child Abuse and Exploitation* - According to the World Health Organization, "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'.

*Safeguarding Policy* - A document which demonstrates a commitment to safeguard children from harm and makes clear to all what is required in relation to the protection of children. It helps to create a safe and positive environment for children and to show that the organization is taking its duty and responsibility of care seriously.

*Staff* - replies to anyone who works or acts for or on behalf of GAIA on a full time or part time basis. As such it includes employed staff, interns, consultants etc.

*Partners* - There are two distinctions between GAIA partners: 1. Those who have a contract with GAIA and as such are required to comply with Safeguarding Policy as a condition of the contract. 2. Those where the relationship is less formal or built upon mutual work and interests, rather than a formal contract.

## 6. Main types of violence

- *Physical abuse* may involve hitting, shaking, throwing, burning or scalding, drowning, suffocating, or otherwise causing physical harm. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child who they are looking after. This is commonly described using terms such as 'fictitious illness by proxy' or 'Munchausen's syndrome by proxy'.
- *Emotional abuse* is defined as the persistent emotional ill-treatment of a child such as to cause severe and persistent effects on the child's emotional development. It may involve conveying to children that they are worthless and unloved, inadequate, or valued only so far as they meet the needs of another person. It may involve age or developmentally inappropriate expectations being imposed in children. It may involve causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of ill-treatment of a child, though it may occur alone.
- *Sexual abuse* involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g., rape) or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic materials or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.
- *Neglect* is defined as the persistent failure to meet the basic physical and/ or psychological needs, likely to result in the serious impairment of the child's physical or cognitive development.

## 7. GAIA Safeguarding Policy applies to:

- GAIA partners;
- Employees;
- Trainees.

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In addition, all those acting on behalf of GAIA such as consultants or trainers, all those adults accompanying children to GAIA activities, all those who participate in GAIA activities involving children. All the individuals cited above will be expected to read GAIA Safeguarding Policy and sign a commitment to adhere to its principles and procedures (see Annex 1).

## **8. PREVENTION**

### **8.1. Awareness**

- GAIA will ensure that all its staff, clients or commissioner entities are informed about organization Safeguarding Policy and act in accordance with all its provisions, do no harm children and know how to report a concern. This should be done in ways that are appropriate and accessible given the context.
- Children will be informed about GAIA Safeguarding Policy, code of conduct, the existence of the child protection focal person and complaints mechanism in a child-friendly manner.

### **8.2. Risk Assessments and Safe Programme Design and Implementation**

- GAIA is committed to designing and delivering activities that are safe for children.
- Risk assessments are therefore conducted when designing projects and activities and safety strategies developed accordingly.
- Risk mitigation strategies will be developed and incorporated into the design, delivery and evaluation of activities which involve or impact children.
- In addition to program design, when conducting sensitive activities, a risk assessment must be undertaken to identify any potential dangers and a plan put in place to minimize these risks.
- If the assessment concludes that there are too many risks that cannot be reduced to an acceptable level, then the activity should not proceed.
- Before activities are conducted, the written permission of both parents and children must be obtained. See Annex - Parental Consent Form.

### **8.3. Employment and recruitment**

As a condition for working with GAIA, all staff or trainees are required to undergo the following:

1. Both acceptance and commitment to GAIA Child Safeguarding Policy for working with children by signing a commitment to adhere to the Safeguarding Policy principles and procedures.

This includes in the recruitment and appointment process:

- Employees or trainees are recruited to clear job or role descriptions that include a statement on the position or role's responsibilities to meet the requirements of GAIA Safeguarding Policy.
  - All recruitment interviews should include a discussion on safeguarding and protection, the candidate's understanding of this and GAIA commitment.
2. Signing a personal declaration stating any criminal convictions, including spent convictions. GAIA job application forms include a question asking for consent to gain information on a person's past convictions/pending disciplinary proceedings.

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#### 8.4. Safeguarding Policy Focal Person

GAIA will appoint Safeguarding Policy Focal Persons (SPFPs) who will be responsible for:

- Acting as the first focal point for concerns, incidents about children and vulnerable adults and raise those concerns to the Assembly of Shareholders and director.
- Promote Safeguarding Policy towards children, vulnerable adults, families and the community.
- Promoting awareness and implementation of the Child Safeguarding Policy throughout NAPS Lab organization.
- Monitoring implementation of the Safeguarding Policy and report on developments at the Assembly of Shareholders and director.
- Maintaining reports for each incident.
- Maintaining knowledge of best practices and statutory requirements.
- Acting as a source of support and information for staff on safeguarding issues.

Child Safeguarding Policy Focal Persons for GAIA are:

- Ms. Itziar Vidorreta  
Email address: vidorreta@gaia.es  
Mob: 0034 606564885
- Ms. Sandra Barrio  
Email address: barrio@gaia.es  
Mob: 0034 695756295

The mentioned SPFPs are identified based on their involvement in GAIA established steering committee dedicated to gender equality compliance within the company, overseeing the compliance of all its activities with the related policy aimed at maximum inclusivity.

#### 9. GAIA Code of Conduct

GAIA is committed to protect children from all forms of violence, abuse and exploitation. It will take all necessary actions to prevent and/or respond to children in such situations.

This Code of Conduct includes guidance on ethical and proper standards of behavior of GAIA team towards children. Especially, it has been developed with the best interests of the child as the primary consideration and should be interpreted in a spirit of transparency and common sense.

GAIA team should:

- Treat children and their families with respect and equally, regardless of their age, sex, language, religion, opinion or nationality, ethnic or social origin, status, class, caste, sexual orientation, or any other personal characteristics.
- Provide an enabling environment for children's personal, physical, social, emotional, moral and intellectual development.
- Help children to take part in decisions which concern them according to their age and their level of maturity or their ability.
- Maintain a culture of communication and create trust with the children and their families, so that concerns may be shared and discussed.

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- Be aware what constitutes violence, abuse and exploitation under the Child Safeguarding Policy provisions.
- Recognize signs of abuse and report suspicions immediately to the Safeguarding Policy Focal Person.
- Respect lines of authority and reporting procedures.
- Be aware of high-risk peer situations (e.g. unsupervised mixing of older and younger children and possibilities of discrimination against minors).
- Be aware of potential for peer abuse (e.g. bullying of children).
- Develop special measures/supervision to protect younger and especially vulnerable children from peer and adult abuse.
- Limit access to and/or not expose children to any inappropriate electronic material.
- At all times respect the confidentiality of children's personal information.  
Obtain written consent from the child and parent/carer, when photographing, filming or requesting personal information for activities.
- Ensure that there is a minimum of two staff members present in meetings with children (to allow one to go out to deal with any immediate needs of children).
- Ensure that when children with disabilities participate all buildings are fully accessible for them.
- Precise information on specific equipment used by the disabled child needs to be obtained prior to the event to ensure its accessibility to all buildings and meeting spaces.

GAIA team must not:

- Violate child rights.
- Abuse and exploit children or vulnerable adults.
- Engage in any form of sexual activity with children regardless of the legal age of sexual consent. Mistaking a child's age is not a defense.
- Do not perform activities for children that they can do themselves, including dressing, bathing and grooming.
- Do not discriminate, shame, humiliate, belittle, or degrade children, families and vulnerable adults. This includes anything that may be considered emotional abuse (e.g. use language that will mentally or emotionally abuse a child).
- Do not hit or otherwise physically assault children, do not use corporal punishment.
- Exploit a child for labor (for example through domestic work).
- Invite a child or their relatives to home or develop a relationship with a child and/or their family which may be considered outside normal professional boundaries.
- Show the faces of children who are exploited sexually, victims of trafficking, abuse, in conflict with the law, linked to armed groups or who can easily be located even if their identity has been modified.
- Act in ways that may place a child at risk of abuse, including not giving due consideration to assessing and reducing potential risks to children as a result of implementing activities.
- Transport a child alone without, unless absolutely necessary for the safety of the child.
- Do not condone violations of this code by others – staff, interns, consultants, etc.
- Do not be alone with a child in any circumstances that might be questioned by others.
- Do not allow children to engage in sexually provocative games with each other.
- Do not kiss, hug, fondle, rub, or touch a child in an inappropriate or culturally insensitive way (e.g. do not initiate physical contact, such as holding hands, unless initiated by the child).
- Do not suggest inappropriate behavior or relations of any kind or encourage any crushes by a child.

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## 10. REACTION AND PROTECTION

### 10.1 Reporting procedure

- All GAIA team should be alert to signs that may suggest a child is in need of help (see annex 2). The reporting procedure is made widely available to ensure that everyone is clear what steps to take regarding the safety of children, vulnerable adults and other witnesses.
- All witnessed, suspected or alleged violations of GAIA Child Safeguarding Policy will be immediately reported to the Safeguarding Policy Focal Persons – using the safeguarding reporting form (annex 3). Reporting form can be submitted in hard copy or by email. The guiding principle here is that the safety of the child is always the most important consideration.
- For each case raised or suspected, records will be stored securely with access limited to the Safeguarding Policy Focal Persons and the shareholders.
- The first stage is to decide whether the concerns are internal GAIA or relate to an external situation.
- Ensure timely, effective, confidential, and appropriate responses to safeguarding issues.
- If the concern is internal – regarding the behavior of staff, you have to consider whether you need to report to the local/national public authorities (Police or Social Services). If not, the internal safeguarding procedure needs to be applied. If yes, you have to report to the designated authorities and follow-up on action taken by the authorities and decide on further response, record case and action taken.
- Local contacts with child protection agencies, social services and law enforcement are identified in advance to enable a referral to an outside agency if required to protect the child. Contact details should be retained so a referral can be made quickly and efficiently.
- The Policy Safeguarding Focal Points will act on the concerns or allegations in a confidential manner and in the best interests of the child, irrespective of the nature of the referral, who the allegations are about or who the referrer is or where she/he is from.
- The Policy Safeguarding Focal Points will take appropriate action to protect the child/children, in question from further harm and during and following an incident or allegation. An assessment of the specific kind of support and assistance that is needed will immediately be offered.
- The Policy Safeguarding Focal Points will be responsible to contact the child's family (or guardian) and inform them of the incident and assistance provided. A safeguarding report (annex 2) must be compiled to document details of the incident. The "best interests of the child" must be considered throughout the process.
- An assessment of the specific kind of support and assistance that is needed by the children affected by the incident will be offered.

### 10.2 The internal safeguarding procedure

- GAIA will immediately suspend any employee or trainee who is alleged to have violated the Child Safeguarding Policy, pending the outcome of the investigation. GAIA reserves the right to take any disciplinary action against any of the above who have been proven guilty in an investigation, which may include reporting the incident to the police.

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- GAIA internal investigation completed by the Safeguarding Policy Focal Persons will be submitted to Shareholders Assembly and director who will come to a decision about action to be taken. Decisions from any investigation will be confirmed in writing to the individual concerned.
- Acts of a criminal nature will be referred by GAIA to the police and/or social services and may result in a criminal investigation and conviction.
- When investigating concerns or complaints, the process should be always be fair and, where complaints are upheld, the individual will have the right to appeal the decision. In such instances, the individual must write to the director within one week of receiving written confirmation of the complaint outcome, explaining the grounds for appeal. GAIA Shareholders Assembly and director will consider the appeal, which will include re-examining the evidence and reports and may include talking directly to staff and others involved.
- GAIA director and shareholders will come to a final decision, which will be confirmed in writing. The decision from the appeals process is final.

## 11. Monitoring and Evaluation

GAIA will regularly monitor the implementation of its Safeguarding Policy and procedures.

- Monitoring and evaluation will aim whether the standards from the Safeguarding Policy are implemented.
- GAIA will carry out a survey among its staff and trainees on how the standards from the Safeguarding Policy are being met, how effective they are etc.
- Beside regular monitoring of the Child Safeguarding Policy, reactive monitoring will take place, after incidences have occurred, which will contribute to a learning process for GAIA and if necessary, changes to the safeguarding procedures or reporting procedures.





## ANNEX 1

### Statement of Commitment to GAIA Child Safeguarding Policy

I \_\_\_\_\_, have read and understood the standards and guidelines outlined in this Safeguarding Policy. I agree with the principles contained in and accept the importance of implementing and promoting safeguarding policies, procedures and practices contained within this document while working with GAIA.

I understand that, in the event of suspicions or allegations of my violation of the Code of Conduct GAIA will take any action they deem necessary, which may include, but is not limited to:

- Attempting to establish the facts in the most objective manner possible (the presumption of innocence prevails) while protecting the reputation and confidentiality of the adults involved.
- Undertaking disciplinary actions, which may result in my suspension or termination of contract.
- Initiating judicial proceedings and/or reporting to the competent authorities any violation of the Code of Conduct which may breach national legislation.

I declare I have received, read and understood the GAIA Safeguarding Policy and I commit to know and agree to work in accordance with it.

I declare that I have no criminal records regarding an offence towards a child or vulnerable adults.

NAME \_\_\_\_\_

JOB TITLE/ROLE \_\_\_\_\_

SIGNATURE \_\_\_\_\_

DATE \_\_\_\_\_

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## ANNEX 2

### Signs and Symptoms of Abuse

#### Signs of physical abuse:

- Bruises, burns, sprains, dislocations, bites, cuts
- Improbable excuses given to explain injuries
- Refusal to discuss injuries
- Withdrawal from physical contact
- Arms and legs kept covered in hot weather
- Unwillingness to participate in physical activities that may involve undressing, e.g. sports
- Fear of returning home or of parents being contacted
- Showing wariness or distrust of adults
- Being aggressive towards others

#### Signs of emotional abuse:

- Physical, cognitive or emotional development is delayed
- Highly anxious
- Showing delayed speech or sudden speech disorder
- Fear of new situations
- Low self-esteem
- Inappropriate emotional responses to situations
- Extreme passivity or aggression
- Drug or alcohol abuse

#### Signs of neglect:

- Frequent hunger
- Poor personal hygiene
- Constant tiredness
- Inappropriate clothing, e.g. summer clothes in winter
- Frequent lateness or non-attendance at school
- Untreated medical problems
- Poor social relationship
- Compulsive stealing
- Drug or alcohol abuse

#### Signs of sexual abuse:

- Age inappropriate sexualized behavior or highly sexualized language
- Anal or genital soreness
- Sleep problems
- Fear of being with adults
- Promiscuity
- Extreme risk taking in adolescents



**Annex 3**

**Safeguarding Report Form**

If you have knowledge that a child might be at risk of harm, complete this form.

The report form should be sent only to the Safeguarding Focal Person, who will hold it in a safe and secure place and treat it with the strictest confidentiality.

About you

Your name: \_\_\_\_\_

Your job title: \_\_\_\_\_

Organization you work for: \_\_\_\_\_

Nature of your contact with the child: \_\_\_\_\_

Contact details: Tel: \_\_\_\_\_

E-mail: \_\_\_\_\_

About the child

Name: \_\_\_\_\_

Gender: \_\_\_\_\_

Age: \_\_\_\_\_

Address: \_\_\_\_\_

Child's parents/guardians: \_\_\_\_\_

Has any treatment been given to the child?

Treatment given by \_\_\_\_\_

Taken to hospital

YES \_\_\_\_\_ ; NO \_\_\_\_\_ ;

If yes, which hospital and how taken \_\_\_\_\_

Details of incident

Was the incident:

Observed by you      Suspected      Disclosed by someone else

If the concern was shared by someone else, please state who and their relationship to the child:

\_\_\_\_\_

What happened? Give cause (how and why) if known - If you include personal observations please make a distinction between what is a fact and what is opinion or hearsay (e.g. child's emotional state, visible injuries, etc.):

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Did the child/vulnerable adult or another source say anything to you [if relevant] and how did you respond to him or her

\_\_\_\_\_  
\_\_\_\_\_

Date of the alleged incident: \_\_\_\_\_

Time of the alleged incident: \_\_\_\_\_

Location of the alleged incident: \_\_\_\_\_

Name of the alleged perpetrator (if applicable): \_\_\_\_\_

Were there any other children/people involved in the alleged incident?

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Action taken by you:

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Signature: \_\_\_\_\_

Date: \_\_\_\_\_

For completion by the Safeguarding Focal Person:

Incident/Accident investigated: Yes / No

Written investigation report necessary: Yes / No

Written investigation report necessary: Yes / No

In order to determine the cause of the incident or accident, it may be appropriate to interview parties who were involved.

Witness detail, statements, etc. can be added here:

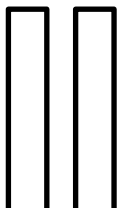
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**Annex 4**  
**Parent Consent Form**

Activity Consent

(Please tick as appropriate):

- I/we give my/our consent for my/our child (name of child) to participate in GAIA activities.
- I/we authorize GAIA to be responsible for my/our child during these activities and authorize them to make decisions concerning any emergency medical treatment for my/our child which may be required during activities.
- I/we affirm that I/we have full authority to give the consent provided for in this document.

Media Consent (Please tick as appropriate):

- I/we give my/our consent for my/our child to take part in media activities which may include photographs, films, videotapes audiotapes, or other forms of recording and which may appear in print (such as newspapers) or online.
- I/we DO NOT give my/our consent for my/our child to take part in media activities.
- I/we confirm that I/we have read and understood the Parental Form and agree to abide by its contents.

Name of the child .....

Date .....

Name and Signature (names of parent(s)/carer(s)) .....

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