



Child and Adolescent Protection Policy



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1. Introduction, Purpose, and Framework of Reference

This Policy establishes Fundación Xcalibur's commitment, principles, standards of conduct, and procedures to create, maintain, and strengthen safe and protective environments for children and adolescents across all its activities, programs, institutional relations, communications, and operations.

Fundación Xcalibur understands that institutional safeguarding is neither an isolated action nor limited to specific programs: it is a cross-cutting responsibility that must be integrated into governance, recruitment, training, selection of partners, design of activities, public communication, use of technologies, incident management, and institutional decision-making.

This Policy serves as a theoretical and practical guide for the daily management of activities carried out directly or indirectly with children and adolescents. When facing any concern, suspicion, allegation, or incident, the guiding principle shall be to act immediately, professionally, confidentially, with respect for the victim, and in compliance with applicable standards and laws.

1.1. Purpose of the Policy

This Policy establishes Fundación Xcalibur's commitment, standards, and procedures to protect children and adolescents from any form of violence, abuse, neglect, exploitation, or harm. To this end, it incorporates institutional safeguarding measures aimed at preventing, mitigating, and managing risks arising from its activities, staff, representatives, partners, programs, and operations.

Specifically, the purpose of this Policy is to:

- Structure Fundación Xcalibur's operations to ensure that its activities, programs, and relationships do not cause harm to children and adolescents.
- Create a safe and protective environment that respects the dignity, rights, well-being, and holistic development of children and adolescents.
- Prevent any form of violence, mistreatment, neglect, exploitation, abuse, harassment, discrimination, degrading treatment, digital harm, or violation of rights.
- Define clear responsibilities for individuals subject to this Policy.
- Establish accessible, safe, and transparent procedures for reporting concerns, suspicions, or incidents.
- Ensure an immediate, child-centered, victim-centered, and age-, gender-, disability-, and context-sensitive response aimed at protection and remedy.

1.2. Situations Covered by this Policy

Concerns, suspicions, allegations, and incidents may vary in nature. Among others, the following situations must be reported:

- Direct observation of an instance of violence, abuse, neglect, or inappropriate treatment involving a child or adolescent.
- Disclosure or report made by a child or adolescent.
- Communication from third parties regarding potential abuse or protection risks.
- Non-compliance with this Policy, the Code of Conduct, or associated procedures by any person subject to this Policy.



- Awareness of legal or judicial proceedings related to acts of violence against children or adolescents initiated against a person subject to this Policy.
- Suspicions involving partners, suppliers, visitors, volunteers, staff from partner organizations, family members, community members, or third parties.
- Situations in which the alleged perpetrator is also a child or adolescent.
- Anonymous, incomplete, or unconfirmed reports that may indicate a risk to the safety or dignity of any person under the age of 18.

1.3. Framework of Reference

- United Nations Convention on the Rights of the Child, 1989.
- Working Together to Safeguard Children, 2015.
- Keeping Children Safe – Child Protection Standards, 2020.
- PSEA: Protection from Sexual Exploitation and Abuse Policy, UNICEF, 2020.
- Fundación Xcalibur's PSEA/PSEAH Policy.

This Policy complements Fundación Xcalibur's Code of Conduct and Ethics, as well as its Policy on the Prevention of and Protection against Sexual Exploitation, Sexual Abuse, and Sexual Harassment. In the event of a conflict or interpretive ambiguity between internal documents, the option offering the highest level of protection to the child or adolescent shall prevail.

2. About Fundación Xcalibur

Fundación Xcalibur is a private, independent, non-profit organization based in Madrid, dedicated to international development cooperation and to improving opportunities for vulnerable children, adolescents, youth, and women. Its work focuses on education, gender equality, environmental sustainability, and community empowerment as tools to foster holistic development, social inclusion, and the creation of opportunities within the communities where it operates.

Through its programs, the Foundation works directly and indirectly with minors, their families, educational institutions, communities, and partner organizations. The nature of this work entails a special responsibility for protection. Fundación Xcalibur recognizes that all minors have the right to grow, participate, and develop in safe environments free from any form of violence, abuse, exploitation, neglect, or improper treatment. Furthermore, it acknowledges that organizations working with children and adolescents are obligated to take proactive measures to prevent risks, protect their rights, and act immediately and appropriately regarding any concern or incident related to their well-being.

Accordingly, the Foundation assumes a firm institutional commitment to child and adolescent safeguarding and protection. This commitment forms part of its duty of care and is integrated into all its activities, relationships, and processes, ensuring that the safety, dignity, best interests, and rights of minors prevail over any other institutional, programmatic, financial, or reputational consideration.

The Foundation promotes an organizational culture based on respect, integrity, responsibility, inclusion, and accountability, demanding the same standards of conduct from all individuals acting on its behalf or collaborating with it. Consequently, it adopts measures for prevention,



detection, response, and continuous learning to ensure its programs and spaces are safe for children and adolescents.

2.1. Institutional Position against Violence

Fundación Xcalibur firmly and unequivocally rejects any form of violence, regardless of the person affected, and recognizes its exceptional gravity when directed against children and adolescents.

Physical, psychological, sexual, institutional, digital, community-based, gender-based violence, or violence motivated by any form of discrimination violates fundamental rights and is particularly severe when affecting individuals in development, given the lasting harm it can inflict on their well-being, self-esteem, health, education, social participation, and life prospects.

This Policy strictly prohibits any form of violence against children and adolescents by persons subject to it, including sexual exploitation, sexual abuse, sexual harassment, sexual violence, and any sexualized behavior towards children and adolescents. Such behaviors shall be addressed in accordance with this Policy, the PSEA/PSEAH Policy, the Code of Conduct, and applicable legislation.

Preventing and responding to these forms of violence requires clear policies and procedures, training, supervision, secure reporting channels, risk analysis, and firm decision-making in the face of any breach. Therefore, this Policy establishes measures to prevent, identify, report, investigate, respond to, and sanction any conduct that violates institutional safeguarding.

3. Scope, Application, and Mandatory Acceptance

This Policy applies to Fundación Xcalibur in Spain and across all its international structures, offices, programs, projects, partnerships, communications, and representations, regardless of their legal form or the country where the activities are carried out.

3.1. Persons Subject to this Policy

For the purposes of this Policy, "persons subject to this Policy" shall mean all individuals who work for, on behalf of, or with Fundación Xcalibur or any of its structures, offices, programs, projects, or affiliated organizations, regardless of the legal nature of their relationship.

This includes, among others, members of its governing bodies, employed staff, executives, representatives, agents, consultants, contractors, suppliers, service providers, subcontractors, interns, regular or occasional volunteers, implementing partners, professional visitors, and any other person acting on behalf of, for the account of, under the mandate of, or in collaboration with Fundación Xcalibur.

This Policy applies to all persons subject to this Policy. The acceptance of working for, on behalf of, or with Fundación Xcalibur implies full adherence to the terms and conditions of this Policy, which constitute essential and indispensable conditions of any employment, contractual, institutional, volunteer, or collaborative relationship with the Foundation.

3.2. Difference between "Persons Subject to the Policy" and "Stakeholders"

The phrase "persons subject to this Policy" is used to identify those who have a direct obligation to comply with the Policy. The term "stakeholders" is reserved for broader actors related to the



protection of children and adolescents, such as children, adolescents, families, communities, educational institutions, authorities, specialized services, donors, partners, or community networks. Certain stakeholders may also be subject to this Policy if they work for, with, or on behalf of Fundación Xcalibur.

3.3. Persons Protected by this Policy

The primary protected population consists of all children and adolescents under 18 years of age who directly or indirectly participate in activities, programs, projects, communications, visits, events, evaluations, research, campaigns, or any action linked to Fundación Xcalibur.

The Policy pays special attention to children and adolescents who may face greater risks or protection barriers due to disability, gender, identity, origin, nationality, cultural background, socioeconomic status, educational diversity, social exclusion, or any other personal, family, or community condition.

This heightened attention shall also apply to migrant, displaced, separated, or unaccompanied children and adolescents, as well as those who are living or have lived in care or protection institutions.

3.4. Covered Activities and Contexts

This Policy applies to all activities, programs, projects, and institutional relationships of Fundación Xcalibur in which children and adolescents participate, or which may directly or indirectly affect their safety, dignity, well-being, or rights.

Its application encompasses both direct intervention spaces and any context in which Fundación Xcalibur, persons subject to this Policy, partners, or collaborators act, participate, or are perceived as representatives of the organization, including:

- In-person, virtual, or hybrid activities.
- Programs, projects, workshops, trainings, events, sports, cultural, educational, or community activities.
- Travel, transportation, accommodation, field visits, meetings, conferences, and travel movements.
- Relationships with partners, suppliers, contractors, subcontractors, and collaborating organizations.
- Institutional communication, photography, videos, testimonials, publications, campaigns, social media, and fundraising activities.
- Use of technologies, digital platforms, messaging services, computer equipment, mobile phones, the internet, social media, and data storage.
- Conduct outside professional hours or spaces when involving children or adolescents and capable of affecting their safety, dignity, or well-being, or compromising the person's suitability, trustworthiness, or responsibility to act on behalf of Fundación Xcalibur.



3.5. Contractual and Institutional Acceptance

Fundación Xcalibur shall ensure that employment contracts, collaboration agreements, partner agreements, service contracts, appointment documents, terms of reference, and equivalent documents include clauses regarding the acceptance of and compliance with this Policy, the Code of Conduct, and other applicable internal policies.

The lack of a formal signature does not exempt a person subject to this Policy from complying with it when they have been informed of its contents, participate in Foundation activities, or act for, with, or on behalf of Fundación Xcalibur.

4. Key Definitions

Where a more protective legal, institutional, or contractual definition exists in the applicable jurisdiction, the definition providing the highest level of protection to the child or adolescent shall apply.

Term	Definition
Child or Adolescent	Any person under 18 years of age, regardless of the age of majority or applicable age of consent in their country of origin, residence, or intervention.
Child and Adolescent Protection	A set of prevention, detection, response, support, and remedy measures aimed at safeguarding the safety, dignity, well-being, and rights of every person under 18 years of age against any form of violence, abuse, neglect, exploitation, or harm.
Institutional Safeguarding	Internal measures adopted by an organization to prevent, reduce, and manage the risks of harm that may arise from its activities, staff, representatives, partners, suppliers, communication, technologies, programs, and operations.
Institutional Child and Adolescent Protection	The responsibility of public or private institutions to establish procedures, guidelines, and practices that ensure their programs, projects, and activities do not cause harm or expose children and adolescents to avoidable risks.
Best Interests of the Child or Adolescent	The principle according to which any decision or action affecting a child or adolescent must prioritize their safety, dignity, well-being, rights, and holistic development.
Positive Care	Relationships based on deep respect, dignity, active listening, empathy, participation, and recognition of the intrinsic value and rights of each child and adolescent.
Wellbeing of Children and Adolescents	The fulfillment of rights and conditions that allow children and adolescents to develop, participate, feel safe, and realize their full potential and capabilities.
Children and Adolescents in Situations of Diversity or Vulnerability	Persons under 18 years of age who, due to disability, gender, identity, origin, cultural background, educational diversity, socioeconomic status, social exclusion, or other personal, family, or community conditions, may face greater risks or protection barriers.
Violence against Children and Adolescents	Any act or omission, threat, or intentional use of physical force or power that causes or is likely to cause physical, psychological, sexual, moral, social, or developmental harm to a child or adolescent.
Mistreatment or Abuse	Any form of physical or emotional abuse, sexual abuse, neglect, negligent treatment, commercial or other exploitation that results in actual or potential harm to a person under 18 years of age's health, survival, development, or dignity.
Discrimination	Denial of the principle of equal rights for a person or social group based on prejudice, stereotypes, or personal or social characteristics, constituting a violation of rights.



Term	Definition
Neglect	Failure to provide necessary attention or care when the person responsible is able to do so, thereby compromising the health, safety, physical, cognitive, or emotional development of the child or adolescent.
Harmful or Deleterious Practices	Traditional, social, or emerging practices that violate rights, such as child marriage, female genital mutilation, corporal punishment, forced feeding, or other practices compromising dignity, health, development, or safety.
Institutional Violence	Any act or omission by public or private institutions that victimizes, harms, or deprives children and adolescents of protection instead of guaranteeing their rights, basic needs, protection, and well-being.
Physical Violence	Direct or deliberate action targeting the physical integrity, health, life, or freedom of a child or adolescent, including hitting, shaking, burning, shoving, choking, or other means of bodily harm.
Emotional or Psychological Violence	Any verbal, symbolic, relational, or behavioral act that impairs the dignity, emotional safety, self-esteem, living conditions, or emotional development of a child or adolescent.
Sexual Violence	Involvement or induction of a child or adolescent in sexual activities, including physical contact, non-contact acts, exposure to sexual images, production of sexual material, or inappropriate sexualized behaviors.
Child Sexual Abuse	Involvement of a child or adolescent in sexual activity that they do not fully understand, cannot give informed consent to, is inappropriate for their developmental stage, violates the law, or occurs within a relationship of responsibility, trust, power, or coercion.
Sexual Exploitation	Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including profiting monetarily, socially, politically, programmatically, or institutionally from the exploitation of another person.
Child Commercial or Labor Exploitation	The use of a child or adolescent in economic or labor activities for the benefit of a third party and to the detriment of their health, education, development, safety, or dignity.
Bullying	Repeated, aggressive, or hostile verbal, psychological, physical, or digital behaviors that create dominance, humiliation, intimidation, exclusion, or harm.
Cyberbullying	Harassment conducted through social networks, messaging apps, digital platforms, or other technological means, including spreading rumors, images, threats, humiliations, or sexual insinuations.
Gender-Based Violence against Children and Adolescents	Any act of violence motivated by sex, gender, gender identity, sexual orientation, or sex characteristics that causes or is likely to cause physical, psychological, sexual harm, or deprivation.
Protection Incident	Any concern, suspicion, allegation, breach, or confirmed event indicating a risk or harm to the safety, dignity, well-being, or rights of a child or adolescent.
Protection Concern or Suspicion	Information, perception, indication, or warning sign—whether confirmed or unconfirmed—that may indicate a child or adolescent is at risk or has suffered harm.
Complaint or Report	Any verbal, written, in-person, digital, internal, or external communication regarding a protection concern, suspicion, allegation, or incident involving children or adolescents.
Victim or Survivor	A child or adolescent who has suffered or allegedly suffered violence, abuse, neglect, exploitation, harassment, discrimination, or any other rights violation.
Complainant	Any person who reports in good faith a protection concern, suspicion, allegation, or incident, whether they are a victim, witness, family member, staff member, partner, supplier, or other individual.



Term	Definition
Alleged Perpetrator	An individual against whom a suspicion, allegation, or information exists linking them to potential conduct contrary to this Policy, without implying any prejudgment of the facts or liability.
Retaliation	Any action or omission that harms, threatens, intimidates, or punishes a person for reporting, cooperating, testifying, or participating in good faith in the management of an incident.
Revictimization	Additional suffering caused to a victim through inappropriate responses, unnecessary exposure, blame-shifting, traumatic repetition of their account, lack of confidentiality, or stigmatizing treatment.
Confidentiality	The principle requiring that access to information regarding incidents, victims, reporters, witnesses, and alleged perpetrators be restricted solely to those who need to know it to protect, respond, investigate, or satisfy legal obligations.
Persons subject to this Policy	All individuals who work for, on behalf of, or with Fundación Xcalibur or any of its structures, including members of governing bodies, staff, volunteers, agents, representatives, consultants, contractors, suppliers, implementing partners, and any other person acting under these conditions.
Stakeholders	Individuals, groups, or organizations that participate in, are affected by, or have responsibilities regarding Fundación Xcalibur's activities, including children, adolescents, families, communities, staff, volunteers, partners, suppliers, authorities, educational centers, funders, and other relevant actors.
Partners	Organizations bound by formal contracts or agreements; organizations with informal arrangements; or entities participating in broader protection networks, consortia, or systems with which Fundación Xcalibur collaborates.
Volunteers	Individuals who collaborate with Fundación Xcalibur free of charge, whether regularly or occasionally, and who are bound by the same behavioral, prevention, and reporting obligations set forth in this Policy.
Child and Adolescent Protection Focal Point	The individual designated to serve as the point of contact, advice, and activation for protection procedures, including receiving reports, guiding teams, initial risk management, and coordinating with headquarters or authorities as appropriate.
Specialized Services or Competent Authorities	Public, community, or specialized entities with a legal mandate or capacity to protect, investigate, provide medical, psychosocial, legal, or social assistance, or adopt formal protective measures in favor of children and adolescents.

5. Guiding Principles

The guiding principles of this Policy establish the ethical and operational framework that must direct all actions of Fundación Xcalibur in its relations with children, adolescents, youth, women, communities, partner organizations, and other stakeholders linked to its programs.

These principles translate the institutional values of the Foundation into concrete criteria for action, prevention, and decision-making, and must be applied across all stages of design, implementation, monitoring, and evaluation of its interventions.

- **Best Interests of the Child or Adolescent.** Any decision or action must prioritize their safety, dignity, well-being, rights, and needs.
- **Zero Tolerance for Violence.** Fundación Xcalibur does not tolerate any form of violence, abuse, exploitation, neglect, harassment, discrimination, or degrading treatment.
- **Do No Harm.** All activities must be designed and executed in a manner that causes no harm and does not expose children and adolescents to avoidable risks.



- **Right to Be Heard.** Children and adolescents have the right to express their views on matters affecting them, appropriate to their age, maturity, and safety.
- **Non-Discrimination.** Protection applies without discrimination based on gender, disability, identity, origin, socioeconomic status, nationality, religion, ethnicity, sexual orientation, sex characteristics, or any other status.
- **Confidentiality and Data Protection.** Information shall be handled on a restricted-access, need-to-know basis, using appropriate security measures.
- **Non-Revictimization.** Incident management must avoid unnecessary exposure, unjustified repetition of accounts, blame-shifting, stigma, or additional harm.
- **Protection Against Retaliation.** Any retaliation against victims, reporters, witnesses, or individuals collaborating in good faith is strictly prohibited.
- **Shared Responsibility.** Institutional safeguarding is the responsibility of all persons subject to this Policy, notwithstanding specific roles and focal points.
- **Active Prevention.** The Foundation works transparently and recognizes that mistreatment and abuse are best prevented when staff, volunteers, partners, children, families, and communities can raise concerns without fear.
- **Collaboration and Coordination.** No single organization can protect children and adolescents in isolation. When necessary, the Foundation will collaborate with public services, authorities, specialized organizations, and local protection systems.
- **Contextualization Without Relativism.** Responses must be adapted to the cultural and legal context, but no custom, tradition, or local practice can justify violence, abuse, exploitation, or neglect.

6. Expected Standards of Conduct

All persons subject to this Policy must act with integrity, respect, transparency, and professionalism in any direct or indirect interaction with children and adolescents.

6.1. Mandatory Behaviors

- Treat children and adolescents with respect, dignity, patience, active listening, and empathy.
- Promote safe, inclusive environments free from violence, discrimination, humiliation, or intimidation.
- Maintain clear professional boundaries and avoid relationships of dependence, favoritism, manipulation, or abuse of power.
- Plan activities with appropriate supervision and avoid unnecessary situations of isolation with minors.
- Ensure children and adolescents know their rights and understand where to go if they feel unsafe.
- Report immediately any protection concern, suspicion, allegation, or incident, even if unconfirmed.
- Respect confidentiality, except when sharing information is necessary to protect a child or adolescent.



- Seek advice from the Focal Point whenever in doubt regarding a risk, behavior, or decision.

6.2. Prohibited Behaviours

Engaging in any form of physical, verbal, psychological, sexual, digital, institutional, or gender-based violence.

- Engaging in sexual activity, sexual contact, sexual advances, or sexualized behavior with a person under 18 years of age, without exception.
- Using position, rank, assistance, money, goods, opportunities, services, grades, awards, or promises to obtain sexual, emotional, or personal favors.
- Hitting, humiliating, insulting, threatening, ridiculing, discriminating against, excluding, or punishing children or adolescents in a degrading manner.
- Conducting unauthorized private communications with minors via messaging, social media, personal phones, or unapproved channels.
- Taking, storing, sharing, or publishing images of minors without valid authorization, risk assessment, or in a manner contrary to their dignity.
- Exposing children or adolescents to violent, sexual, discriminatory, humiliating, or inappropriate content.
- Sleeping in the same room or private space as a minor, except under exceptional, documented, authorized circumstances managed with security safeguards.
- Transporting a minor alone without authorization and supervisory measures, except in a justified emergency.
- Requesting or keeping secrets that could compromise the safety of a child or adolescent.
- Conducting informal investigations, questioning the victim, or confronting the alleged perpetrator outside the established procedure.
- Retaliating against victims, reporters, witnesses, or individuals collaborating in good faith.

6.3. One-on-One Contact Situations

Individual interactions with children and adolescents should be avoided when unnecessary. If an activity requires one-on-one attention, it must take place in visible spaces or under transparent and supervised conditions, while respecting the minor's privacy and dignity.

6.4. When the Alleged Perpetrator is Also a Minor

Children and adolescents can cause harm to other minors, especially where differences in age, power, influence, disability, gender, status, or vulnerability exist. In these situations, the response must prioritize protecting the victim, while recognizing that the alleged perpetrator is also a minor who may require support, specialized guidance, and educational or protective measures. The Foundation will avoid disproportionately punitive responses and act in the best interests of both minors.



7. Roles and Responsibilities

The protection of children and adolescents is an institutional and shared responsibility. All individuals connected to Fundación Xcalibur must know, respect, and apply this Policy within the scope of their functions, relationships, and activities.

7.1. Board of Trustees and Governing Bodies

The Board of Trustees and governing bodies of Fundación Xcalibur are responsible for ensuring that child and adolescent protection forms an integral part of the institutional culture, risk management, and accountability mechanisms of the Foundation.

Their responsibilities include:

- Approving this Policy and its updates;
- Promoting an institutional culture of zero tolerance towards any form of violence, abuse, exploitation, or neglect against children and adolescents;
- Ensuring the existence of adequate resources, responsibilities, and mechanisms to implement the Policy;
- Supervizing, at a strategic level, the application of the Policy and the management of relevant risks;
- Receiving aggregated and non-identifying information on the implementation of the Policy when appropriate.

7.2. Executive Management

The Executive Management of Fundación Xcalibur is responsible for guaranteeing the effective implementation of this Policy across the Foundation's institutional and programmatic management.

Their responsibilities include:

- Ensuring that the Policy is integrated into institutional processes, projects, partnerships, and decisions;
- Designating the Safeguarding/Protection Coordinator at Headquarters and, where appropriate, local protection focal points or coordinators in the field;
- Guaranteeing the existence of appropriate reporting and response channels;
- Making decisions regarding preventive, corrective, disciplinary, or contractual measures;
- Ensuring coordination with authorities, donors, partner organizations, or specialized services when appropriate
- Promoting training and awareness-raising for staff and collaborators;
- Ensuring that child and adolescent protection is allocated sufficient institutional resources and support.

7.3. Safeguarding/Protection Coordinator at Headquarters

The Safeguarding/Protection Coordinator or Focal Point at Headquarters is the individual or body designated by Fundación Xcalibur to coordinate the institutional application of this Policy, support local focal points, and ensure a coherent, safe, and diligent response to concerns, suspicions, or incidents related to the protection of children and adolescents.



Their role is to ensure that the Foundation has common criteria, clear procedures, adequate record-keeping, risk-proportional prevention and response measures, and monitoring and learning mechanisms. The Headquarters Coordinator or Focal Point does not replace the collective responsibility of the persons subject to this Policy, nor the competencies of authorities or specialized services.

Their minimum responsibilities include:

- Coordinating the overall implementation of the Policy and supporting its adaptation to different countries, programs, and operational contexts;
- Advising and accompanying local focal points, project teams, management, human resources, and partners when protection doubts, concerns, or incidents arise;
- Receiving and analyzing notifications escalated by local focal points or other internal channels;
- Ensuring that immediate protective measures are adopted when there is a current or imminent risk to a child or adolescent;
- Guiding the initial risk assessment and the definition of mitigation measures, referral, support, or escalation to competent authorities;
- Coordinating, together with management and human resources, any necessary internal measures when a concern or complaint involves a person subject to this Policy;
- Activating or recommending the activation of internal investigation procedures where appropriate, guaranteeing confidentiality, impartiality, due process, and protection against retaliation;
- Ensuring that cases are documented securely, proportionally, and in accordance with the need-to-know principle;
- Maintaining a centralized and confidential record of concerns, incidents, measures adopted, referrals, decisions, and case closures;
- Verifying the existence of updated local referral pathways in intervention countries, in coordination with local focal points;
- Supporting the identification of systemic gaps, recurring risks, or needs for improvement in programs, partners, recruitment, training, or procedures;
- Promoting regular training, awareness-raising, and updates for staff, volunteers, focal points, partners, and other collaborators;
- Coordinating the preparation of internal reports, self-assessments, action plans, and periodic reviews of the Policy;
- Formulating recommendations to management or governing bodies regarding preventive, corrective, disciplinary, contractual, or institutional measures;
- Ensuring coherence among this Policy, the PSEA/PSEAH Policy, the Code of Conduct, XSM human resources procedures, and Fundación Xcalibur reporting mechanisms.

The Headquarters Coordinator or Focal Point shall not conduct informal investigations, interrogate children or adolescents, substitute specialized professionals, or unilaterally decide on disciplinary or criminal liability. Their role is to coordinate the institutional response, activate established procedures, safeguard confidentiality, ensure immediate protection measures are taken, and escalate decisions to the competent bodies of Fundación Xcalibur or relevant authorities when appropriate.



7.4. Field Protection Coordinator or Focal Point

When required by the nature of the programs, countries, or activities, Fundación Xcalibur may appoint a Field Protection Coordinator or Focal Point. This person will act as the local operational reference to facilitate the application of the Policy in the specific intervention context.

The Child and Adolescent Protection Focal Point serves as the reference person for inquiries, initial guidance, and the channeling of concerns or incidents related to this Policy. Their function is to support the operational application of the Policy in the field or at headquarters, as applicable, without replacing the collective responsibility of all persons subject to this Policy or assuming functions corresponding to management, human resources, specialized services, or competent authorities.

Their minimum responsibilities include:

- Supporting the identification, analysis, and mitigation of protection risks in programs, projects, activities, travel, events, and visits;
- Ensuring that local teams, partners, suppliers, volunteers, and other collaborators are aware of child and adolescent protection standards, reporting channels, and their specific responsibilities;
- Promoting training, awareness-raising, and ongoing support actions for local staff, volunteers, partners, and teams;
- Providing accessible and understandable information to children, adolescents, families, and communities regarding their rights, conduct standards, support channels, and reporting mechanisms;
- Acting as a point of contact for inquiries, concerns, or reports, ensuring safe, respectful, and confidential reception;
- Coordinating the receipt, minimal necessary recording, and immediate escalation of concerns or incidents to the Headquarters Protection Coordinator or the designated competent instance within the Foundation;
- Advising on immediate protection measures when a current or imminent risk exists for a child or adolescent;
- Maintaining updated information on local referral pathways, specialized services, and competent authorities regarding protection, health, psychosocial support, legal assistance, and security;
- Facilitating coordination with specialized services, partner organizations, or local authorities as appropriate, in accordance with the best interests of the child, confidentiality, need-to-know principles, and applicable regulations;
- Documenting only the information necessary for case management, ensuring its proper custody, and protecting the confidentiality of victims, reporters, witnesses, and involved individuals;
- Supporting partners and local teams in implementing the Policy, identifying gaps, practical difficulties, or reinforcement needs;
- Participating in monitoring, learning, and continuous improvement actions, including the identification of systemic gaps and the formulation of recommendations to strengthen prevention and response.



The Focal Point shall not investigate independently, determine liability, or replace competent authorities or specialized services. Their primary function is to guide, activate established procedures, promote immediate protective measures, and ensure that information is channeled safely and confidentially.

7.5. Program and Project Teams

Teams responsible for programs and projects must integrate child and adolescent protection into the management cycle of their activities, from design to closure.

Their responsibilities include:

- Conducting or supporting child and adolescent protection risk assessments;
- Applying prevention and supervision measures during activities;
- Informing children, adolescents, families, and communities about standards of conduct and support channels;
- Ensuring that partners, suppliers, and collaborators understand their protection obligations;
- Immediately communicating any concern or incident;
- Collaborating in case management and follow-up measures when required.

7.6. Staff, Volunteers, Consultants, and Collaborators

All individuals working with or collaborating with Fundación Xcalibur must:

- Know, accept, and comply with this Policy and the Code of Conduct;
- Act respectfully, safely, and appropriately toward children and adolescents;
- Prevent risk situations within the scope of their duties;
- Immediately report any suspicion, concern, or incident;
- Cooperate with assessment, response, or investigation procedures;
- Maintain the confidentiality of the information to which they have access;
- Refrain from any conduct that could compromise the safety, dignity, or rights of children and adolescents.

7.7. Partner Organizations, Suppliers, and Third Parties

Partner organizations, suppliers, contractors, collaborating entities, and third parties linked to Fundación Xcalibur's activities must respect the child and adolescent protection standards established by the Foundation, particularly when their activities involve direct or indirect contact with children and adolescents.

The Foundation will ensure that relevant agreements, covenants, or contracts include specific child and adolescent protection commitments, reporting obligations, collaboration in incident management, and the right to adopt contractual measures in the event of non-compliance.

Role	Main responsibilities
All individuals subject to this Policy	Know and comply with the Policy; act with duty of care and respect; prevent risks; report concerns; cooperate with protection, investigation, and follow-up measures.



Role	Main responsibilities
Child and Adolescent Safeguarding Focal Point	Act as the point of contact; receive and log reports; activate procedures; advise teams; coordinate risk assessments; support referrals; maintain confidentiality; escalate cases to headquarters.
Country / Project / Program Management	Ensure operational implementation; support the Focal Point; adopt immediate measures; coordinate with partners; secure resources for prevention and response.
Fundación Xcalibur Headquarters	Oversee global compliance; decide on internal investigations; coordinate with Management, HR, and the Board; ensure institutional consistency and corrective actions.
Human Resources	Integrate safe recruitment, contractual clauses, training, disciplinary measures, record-keeping, and employment-related case management.
Communications	Validate the safe use of images, stories, and publications; protect identity and dignity; coordinate with the Focal Point regarding sensitive content.
IT / Systems	Support blocking measures, digital protection, secure management of tech incidents, evidence custody, and prevention of access to harmful content.
Partners and Suppliers	Comply with safeguarding clauses; prevent risks; report incidents; cooperate with investigations; adopt corrective measures.
Governing Body / Board of Directors	Approve the Policy; oversee its implementation; receive high-level reports; ensure resources, independence, and accountability

8. Non-Compliance, Disciplinary, and Corrective Measures

Non-compliance with this Policy may result in administrative, disciplinary, contractual, civil, or criminal measures, in accordance with applicable legislation and the nature of the relationship with the individual subject to this Policy.

- Formal warning, corrective training, or enhanced supervision.
- Preventive suspension of duties or from contact with minors.
- Termination of contract for employment, volunteering, consultancy, collaboration, agreement, or relationship with a partner/supplier.
- Referral to competent authorities when there are indications of a crime or a legal obligation to report.
- Redress, prevention, and institutional improvement measures to reduce recurring risks.
- Updating of procedures, training, or internal controls when the case reveals systemic gaps.

The adoption of internal measures does not replace obligations to notify or cooperate with competent authorities where applicable. Confidentiality shall be maintained during any internal investigation, without prejudice to sharing necessary information to protect individuals or fulfill legal obligations.

9. Monitoring, Evaluation, and Review of the Policy

This Policy shall be made available to Fundación Xcalibur staff and collaborators. The Foundation may disseminate summarized, adapted, or translated versions when necessary to ensure its understanding and application across different operating contexts.



Communication of the Policy must be carried out in a clear and accessible manner, ensuring its content is not limited to a formal document without practical application.

9.1. Monitoring, Evaluation, and Review of the Policy

Fundación Xcalibur will monitor the implementation of this Policy to ensure its effective application, identify opportunities for improvement, and strengthen the protection of children and adolescents across its programs and activities.

9.2. Implementation Monitoring

Monitoring will be coordinated by the Safeguarding Coordinator at headquarters, with the support of Executive Management, program teams, and, where applicable, field safeguarding focal points.

Monitoring may include, among other aspects:

- The number or proportion of individuals trained or sensitized in child and adolescent safeguarding;
- The incorporation of risk assessments into relevant programs and activities;
- The inclusion of child and adolescent safeguarding clauses in relevant contracts, conventions, or agreements;
- The functioning and effectiveness of reporting channels;
- Policy awareness among teams, partners, children, adolescents, families, and communities;
- The aggregated recording and analysis of concerns, incidents, or managed cases;
- Improvement measures adopted following incidents or internal reviews;
- Compliance with obligations by partners, suppliers, and collaborators.

Monitoring information must be handled on an aggregated and confidential basis, avoiding the identification of children, adolescents, or affected individuals unless strictly necessary for protection and case management purposes.

9.3. Case Review and Continuous Improvement

The Foundation may conduct internal reviews of closed cases, incidents, recurring concerns, or identified risks to extract lessons learned and improve its prevention and response measures.

These reviews must focus on institutional improvement rather than the unnecessary exposure of affected individuals. Conclusions may lead to updated procedures, enhanced training, improved reporting channels, adjustments in program design, or changes in institutional practices.

9.4. Periodic Review of the Policy

This Policy shall be reviewed periodically and, in any case, whenever significant changes occur in the regulatory framework, organizational structure, intervention contexts, or programs, or following the identification of significant risks or lessons learned.

The review shall ensure that the Policy remains up to date, applicable, aligned with child and adolescent safeguarding standards, and suited to the operational reality of Fundación Xcalibur.



10. Entry into Force, Approval, and Updating

This Policy shall enter into force upon its approval by the competent governing body of Fundación Xcalibur and shall be binding on all individuals and entities within its scope of application.

The Foundation shall take the necessary measures to communicate the Policy, facilitate its understanding, and progressively integrate it into its internal processes, programs, collaboration agreements, and monitoring mechanisms.

Any substantial modification to this Policy must be reviewed and approved in accordance with Fundación Xcalibur's internal procedures. Updated versions shall replace previous ones as of the specified date of entry into force.

10.1. Operational Procedures

The operational procedures detail the practical application of this Policy and establish the measures necessary to prevent, identify, report, and respond to any situation that may affect the safety, dignity, integrity, or rights of children and adolescents linked to the programs, activities, or institutional relationships of Fundación Xcalibur.

This section must be read in conjunction with the guiding principles, rules of conduct, Code of Conduct, and other applicable internal policies. Its purpose is to ensure that child and adolescent safeguarding translates into concrete, traceable, and consistent actions across all of the Foundation's areas of operation.

The operational implementation of the Policy will be carried out through, at a minimum, the following lines of action: training and awareness-raising; safe programming; providing information to children, adolescents, families, and communities; safe recruitment; working with partners and suppliers; communication and digital protection; reporting, case management, and assistance; and monitoring and continuous improvement.

10.2. Operational Coordination of Procedures

The implementation of these procedures will be coordinated by the Safeguarding Coordinator at headquarters, with the support of field safeguarding focal points or coordinators where applicable. Their specific functions are detailed in Part I of this Policy.

The existence of these coordination roles does not replace the individual and collective responsibility of all persons subject to this Policy, who must prevent risks, comply with the rules of conduct, report any concerns, and collaborate with appropriate response measures.

The practical implementation of the Policy will be carried out, at a minimum, through the following lines of action or operational procedures:

- Integrating child and adolescent safeguarding into the design and management of programs and activities;
- Conducting risk analysis and mitigation for children and adolescents;
- Safe selection and recruitment of staff, volunteers, consultants, suppliers, and partner organizations;
- Training and awareness-raising for individuals associated with the Foundation;
- Providing age-appropriate information to children, adolescents, families, and communities;



- Safe use of images, testimonials, and personal data;
- Establishing safe and accessible reporting channels;
- Assigning clear responsibilities at headquarters and in the field;
- Monitoring, documenting, and periodically reviewing safeguarding measures.

These actions must be applied proportionally based on the type of activity, the level of contact with children and adolescents, the operating context, and the identified risks.



	Standard Operational Procedure	
PO.01	Training, Advisory, and Support	Page 1/2

Fundación Xcalibur recognizes that the protection of children and adolescents is a collective and priority responsibility. To ensure effective implementation of this Policy, the following guidelines regarding training, advisory, and support are established:

Mandatory Initial Training

All staff members, interns, and volunteers associated with projects involving children must receive mandatory training (including the delivery of manuals with signed proof of review, as well as various external online training tools) covering:

Child and adolescent safeguarding principles;

- Identification of risks, warning signs, and situations of vulnerability;
- Code of Conduct and expected behaviors; Reporting channels and the duty to communicate concerns;
- Case management and response procedures;
- Roles of the Safeguarding Coordinator at headquarters and field focal points;
- Confidentiality, data protection, and non-retaliation;
- Child-centered approach;
- Safe use of images, testimonials, and personal data.

Depending on the context and whenever possible, local partners will be included in the training sessions.

Continuous Training

- All staff and volunteers will have the opportunity to regularly update their knowledge of child and adolescent safeguarding.
- Additional training will be provided when required by the nature of the work, the specific role of the employee, or their level of experience and education. This may include topics such as child well-being, managing high-risk situations, and the emotional and physical safety of minors, among others.

Record-Keeping and Monitoring

- All training and induction sessions must be documented and archived in the Foundation's records.
- Files must include the date of the training, a complete list of participants, and any relevant materials used during the session.

Support and Advisory

- It is recognized that while all adults share the responsibility to protect children, no individual should carry out this task in isolation.



	Standard Operational Procedure	
PO.01	Training, Advisory and Support	Page 2/2

- Fundación Xcalibur will formally designate a Safeguarding Coordinator or Focal Point in each operating context where deemed necessary due to the risk level, program nature, or operational structure.

The Safeguarding Coordinators in each country are responsible for providing ongoing support to staff, volunteers, and partner organizations, as well as facilitating the effective application of this Policy in coordination with headquarters.

- Every request for assistance or advice regarding child and adolescent safeguarding must be taken seriously and never interpreted as a lack of competence on the part of the person making the request.
- In the event that a person associated with the Foundation is involved in a child and adolescent safeguarding incident—whether as the subject of an investigation or as a witness—they will be provided with necessary support, which may include additional supervision and/or specialized psychological or emotional support.



	Standard Operational Procedure	
PO.02	Prevention and Safe Programming (Programmatic Aspects)	Page 1/3

Safeguarding Risk Assessment and Management

Every program, project, or activity involving direct, indirect, digital, or communication contact with children and adolescents must incorporate a prior safeguarding risk assessment. This assessment must be carried out from the design phase and adapted to the context, the nature of the activity, the profile of the participants, the level of exposure, and any existing vulnerability situations.

Risk assessment is not a one-time exercise. It must be reviewed during implementation and upon completion of activities to identify contextual changes, adjust mitigation measures, and document lessons learned for future interventions.

The risk analysis must consider, among other aspects:

- The age, gender, situation of vulnerability, and specific needs of the participating children and adolescents;
- The expected type of contact between adults and children or adolescents;
- The physical or digital spaces where the activity will take place;
- The participation of third parties, partner organizations, suppliers, visitors, or other collaborators;
- Transportation, accommodation, events, and sports, educational, cultural, psychosocial, or community activities;
- The use of images, testimonials, personal data, social media, or communication materials;
- Barriers to accessing reporting, support, or referral channels;
- Risks arising from the local context, including insecurity, discrimination, violence, exploitation, abuse, neglect, or social exclusion.

When risks are identified, Fundación Xcalibur must adopt proportional mitigation measures and document them prior to the start of the activity, always in coordination with the HR Department of XSM. These measures may include, but are not limited to, adjustments in supervision, modification or cancellation of activities, additional chaperoning, access restrictions, reinforcement of conduct rules, space adaptations, specific information provided to families or adult guardians, additional team training, or the activation of referral pathways.

If the assessment concludes that risks cannot be reduced to an acceptable level, the activity must not be carried out.

Safe Design and Execution of Programs, Projects, and Activities

Fundación Xcalibur's programs, projects, and activities must be designed and executed in a manner that promotes safe, inclusive, respectful, and appropriate environments for children and adolescents. Safeguarding must be integrated into planning, budgeting, venue selection, team composition, partnerships, family communication, information management, and monitoring mechanisms.



	Standard Operational Procedure	
PO.02	Prevention and Safe Programming (Programmatic Aspects)	Page 2/3

In particular, it must be ensured that:

- Activities are suitable for the age, maturity, capabilities, and circumstances of participating children and adolescents;
- Clear criteria for adult supervision, chaperoning, and team responsibilities are established;
- Unjustified one-on-one or isolated situations between an adult and a child or adolescent are avoided;
- Physical and digital spaces are safe, accessible, and appropriate for the planned activity;
- Children and adolescents receive understandable information about their rights, rules of conduct, and channels to ask for help or report a concern;
- Families, legal guardians, or community leaders are informed when applicable;
- Activities are carried out under criteria of inclusion, equality, non-discrimination, and respectful treatment;
- Staff, volunteers, partners, and suppliers involved have the necessary information, training, and support to apply this Policy.

Before conducting activities with children and adolescents, written informed consent must be obtained, where applicable, from parents or legal guardians, as well as the informed assent of the child or adolescent according to their age and maturity. This obligation also applies when children or adolescents reside in institutions or are under the care of legal guardians.

When individuals responsible for giving consent are unable to read or write, the content of the document must be clearly explained in an understandable manner by a team member. In such cases, consent may be formalized using a mark, fingerprint, or other valid means, in the presence of a witness, in accordance with the local context and applicable legislation.

Fundación Xcalibur will pay special attention to children and adolescents who may face heightened vulnerability, including those affected by poverty, displacement, disability, violence, discrimination, social exclusion, language barriers, family separation, institutionalization, or other circumstances that increase their exposure to risks.

Staff and volunteers working with children and adolescents will receive ongoing support and access to spaces to address questions, review risk situations, and share lessons learned—for example, through team meetings, supervision sessions, informal discussions, or case reviews. Safeguarding measures will be reviewed during implementation and upon completion of the activity to make timely adjustments and improve future interventions.



	Standard Operational Procedure	
PO.02	Prevention and Safe Programming (Programmatic Aspects)	Page 3/3

Risk Assessment Checklist

Before starting any activity, program, or project involving direct, indirect, digital, or communication participation of children and adolescents, the responsible team must verify at least the following points:

- Does the activity involve direct, indirect, digital, or communication contact with children and adolescents?
- Have physical, emotional, sexual, digital, transportation, accommodation, or public exposure risks been identified?
- Have supervision measures, appropriate staff-to-child ratios, safe spaces, and designated responsible persons been defined?
- Are all necessary authorizations and consents in place?
- Have staff, volunteers, partners, and suppliers involved been informed, trained, and, where applicable, vetted?
- Do children and adolescents know their rights, rules of conduct, and how to access channels to ask for help?
- Have families, legal guardians, or community leaders been informed where appropriate?
- Are partners and suppliers aware of this Policy and reporting channels?
- Are referral pathways in place for protection, health, psychosocial support, or legal assistance services?
- Have specific measures been planned for children and adolescents with disabilities, language barriers, family separation, displacement status, or other vulnerabilities?
- Does the activity involve the use of images, testimonials, personal data, social media, or communication materials?
- Have mitigation measures been documented?
- Are the residual risks acceptable? (If not, the activity must not proceed.)



	Standard Operational Procedure	
PO.03	Information for Children, Adolescents, Families, and Communities	Page 1/1

Fundación Xcalibur will ensure that participating children and adolescents, as well as their families, legal guardians, or community leaders where applicable, receive clear, accessible, and adapted information regarding this Policy, expected standards of behavior, and available channels for communicating concerns or requesting support.

Information must be presented in a manner appropriate to the age, language, level of understanding, and cultural context of the participants. When new individuals, community members, families, or participants join Fundación Xcalibur activities, essential information regarding the Policy and safeguarding channels must be communicated during introductory meetings or sessions and recorded using a tracking document. Where appropriate, the Foundation may utilize visual materials, information sessions, oral explanations, posters, participatory dynamics, or other accessible formats.



	Standard Operational Procedure	
PO.04	Safe selection	Page 1/2

Safe Selection and Recruitment of Staff, Volunteers, and Collaborators

Fundación Xcalibur will apply safe selection and vetting criteria for all individuals who may have direct, indirect, digital, or communication contact with children and adolescents. Safe recruitment is an essential component of prevention and aims to reduce the risk of onboarding individuals who may pose a threat to their safety, dignity, or rights.

Depending on the nature of the position, role, or relationship, the Foundation may apply the following measures:

- Identity verification and professional reference checks;
- Background checks where legally permissible and relevant;
- Interviews incorporating suitability criteria for working with children and adolescents;
- Formal acceptance of this Policy and the Code of Conduct;
- Inclusion of child and adolescent safeguarding clauses in contracts, conventions, and collaboration agreements;
- Mandatory training or awareness sessions prior to starting activities with children and adolescents (which may be conducted using a practical guide).

Partner organizations, suppliers, or collaborating entities participating in activities involving children and adolescents must commit to upholding equivalent child and adolescent safeguarding standards. Where applicable, this commitment must be reflected in the agreements or conventions signed with Fundación Xcalibur.

Safe selection measures must be adapted to the expected level of contact with children and adolescents and the risk associated with the position, role, or activity. No individual shall begin activities involving minors without completing the required minimum vetting checks. In exceptional situations involving urgent onboarding, mitigation measures must be implemented, including enhanced supervision, restricted duties, and a prohibition on working alone with children or adolescents until pending checks are completed.

Working with Partners, Suppliers, and Third Parties

Fundación Xcalibur will integrate child and adolescent safeguarding into its relationships with partner organizations, suppliers, contractors, subcontractors, and third parties directly or indirectly involved in Foundation-related activities, programs, services, or communications.

Prior to establishing a significant partnership—and particularly where contact with children and adolescents is involved—the Foundation must assess the partner's or supplier's alignment with the principles of this Policy, their track record in working with minors, the existence of equivalent policies or procedures, and their capacity to prevent, report, and respond to safeguarding incidents.



	Standard Operational Procedure	
PO.04	Safe selection	Page 2/2

Relevant agreements, conventions, or contracts must include, where applicable, child and adolescent safeguarding clauses, formal acceptance of this Policy or equivalent standards, the obligation to report concerns, cooperation in incident management, and possibility of adopting corrective measures, suspension, or termination of the relationship in the event of non-compliance.

The existence of a suspicion or incident linked to a partner or supplier will not automatically imply the termination of the relationship. The Foundation will evaluate the severity of the case, the safety of the minor, the partner's cooperation, the corrective measures adopted, and the risk of continuity.



	Standard Operational Procedure	
PO.05	Child Protection in Digital and Communication Environments	Page 1/3

Fundación Xcalibur will ensure that the capture, use, storage, and dissemination of images, videos, testimonials, life stories, or personal data of children and adolescents are carried out in accordance with criteria of dignity, safety, informed consent, data protection, and non-exposure to risks.

Before using images or testimonials, the Foundation must ensure that there is a legitimate purpose, appropriate authorization, and a risk assessment. The participation of children and adolescents in institutional communications must avoid any form of exposure, stigmatization, revictimization, sensationalism, or instrumental use of their personal situation.

Under no circumstances will data, images, or information be published that allow the identification or location of a child or adolescent when doing so could compromise their safety, privacy, dignity, or well-being.

Photos and Videos for Media

In the context of all its activities, Fundación Xcalibur must request signed authorization to capture images during its activities. The use of these images is strictly supervised by the Foundation with the sole objective of promoting the social work carried out within the framework of these programs/projects.

Service providers who may intervene in the context of capturing these images will have no usage rights over them; the images remain for the exclusive use of Fundación Xcalibur. These rights may be granted within the context of communication efforts by Fundación Xcalibur's financial partners.

The following rules apply to taking and using photos and videos:

1. Comply with this Policy and its procedures.
2. Do not publish information that could identify children or adolescents and put them in danger—particularly when they are victims of violence—nor sensitive or excessively detailed information
3. Always respect the dignity of the child or adolescent. They shall not be portrayed as passive, weak, or helpless victims, nor in a sensationalist manner.
4. Images and stories must represent children and adolescents in a dignified, positive, and respectful manner, highlighting their capacities, strengths, and context, and avoiding the dramatization of their experiences.
5. Ensure that the child or adolescent does not pose in an inappropriate or sexualized manner, or in any way that could harm them or another person.
6. Do not take or publish photographs or videos of children or adolescents who are unclothed, inappropriately dressed, or in degrading, exploitative, or potentially harmful situations.
7. The taking of photos or videos is strictly reserved for professional use by Fundación Xcalibur.



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PO.05	Child Protection in Digital and Communication Environments	Page 2/3

8. Staff, volunteers, and partners are encouraged to like and share photos and videos validated and published by Fundación Xcalibur on social media, thereby promoting their wider dissemination. However, photos that have not been approved under this Policy must not be shared or uploaded to social media.
9. Never include titles, metadata, captions, or other information that could put the child at risk as a potential victim of abuse.
10. When publishing or distributing photos, images, videos, news, etc., personal information such as full name, address, school, and other identifying elements must never appear.
11. Use only photographs that are cleared for public use (verified and validated by the focal point and the visual communications officer).

Online Safety and Protection

1. Coordinators shall ensure that staff, volunteers, partners, and collaborators receive sufficient information on the appropriate use of technology, including the internet, mobile phones, social media, messaging apps, and digital platforms.
2. Filtering and blocking software must be installed to prevent access to inappropriate or offensive content. In general, all websites that incite child abuse or contain images and information harmful to children must be blocked.
3. If offensive content, unsolicited messages/chats, or harmful materials are received, they must be reported to the Child and Adolescent Safeguarding Focal Point, who will route them, where appropriate, to the IT or systems department to implement suitable protective and preventive measures.
4. In the event that Child Sexual Abuse Material (CSAM) or other illegal or harmful content is accidentally received or uploaded, it must not be forwarded, downloaded, copied, or attached to the report unless expressly instructed by a competent authority. The situation must be reported immediately through the established channels, maintaining security, confidentiality, and data integrity.
5. Staff, volunteers, and collaborators must also inform their direct supervisor or designated channel regarding any offensive, illegal, or harmful content accidentally received or uploaded.

Information and Communication Technology (ICT)

Fundación Xcalibur maintains its own regulations regarding IT and technology management.

- The foundational principle is to respect and protect the dignity of children, adolescents, their families, and their communities. The right to privacy of children and adolescents must always be upheld.
- IT equipment is provided for professional use, and its usage is subject to this Policy, internal standards on the use of technological devices, and applicable data protection regulations.
- The use of computers and technological resources for personal use is not permitted.



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PO.05	Child Protection in Digital and Communication Environments	Page 3/3

- Access to professional equipment, systems, or files shall be carried out solely when necessary, proportionate, and in accordance with applicable regulations, the internal policy on the use of technological devices, and data protection legislation—especially in cases of founded suspicion of serious non-compliance, risk to children and adolescents, or access to illegal or harmful content.
- Any voluntary access to websites or content that is illegal, harmful, or contrary to this Policy is strictly prohibited and may justify disciplinary or contractual measures. Any unintentional access to harmful data or content must be reported immediately to activate protective measures and avoid misunderstandings.



	Standard Operational Procedure	
PO.06	Reporting, Case Management, and Response Procedure	Page 1/9

Reporting, Case Management, and Response Procedure

Fundación Xcalibur establishes a reporting, case management, and response procedure to ensure that any suspicion, concern, incident, or violation related to the protection of children and adolescents is handled diligently, confidentially, impartially, securely, and centered on the best interests of the child or adolescent.

This procedure applies to any communication related to potential situations of violence, abuse, exploitation, neglect, mistreatment, breach of the Code of Conduct, exposure to risks, or any other conduct that may affect the safety, dignity, integrity, or rights of a child or adolescent within the framework of Fundación Xcalibur's activities, programs, or institutional relationships.

The Safeguarding Coordinator at headquarters is responsible for ensuring the proper activation and monitoring of the procedure, without prejudice to the responsibilities of the Foundation's Leadership and project teams. On the ground, the corresponding safeguarding focal point or field coordinator will support risk identification, the initial reception of concerns, the adoption of urgent measures, and immediate communication with headquarters in accordance with established channels.

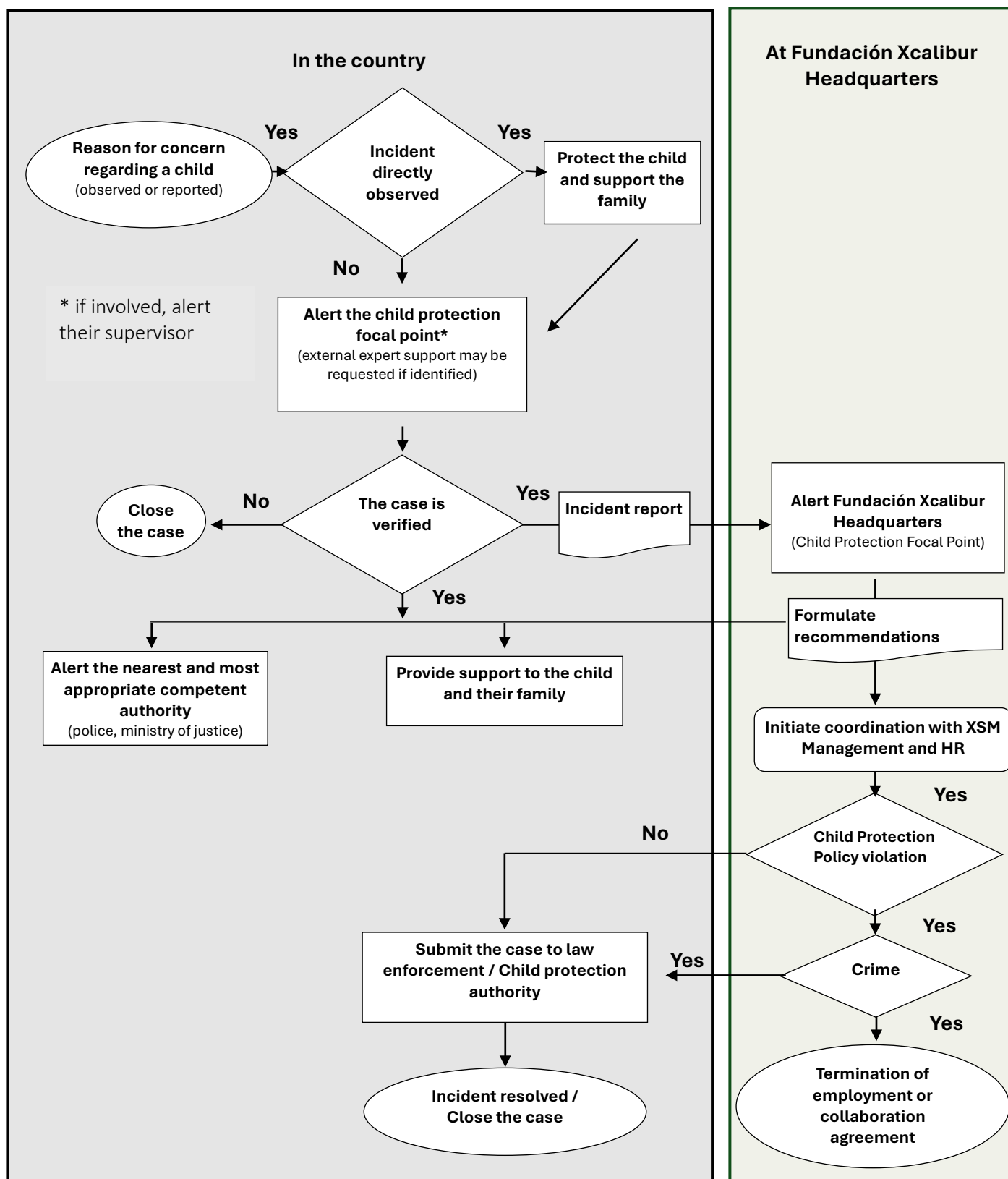
The operational procedure for reporting, investigation, and support is summarized as follows:

1. Detection or reception of a concern.
2. Immediate protection of the child or adolescent.
3. Notification to the Focal Point or designated alternative lead.
4. Initial written record.
5. Initial risk assessment and precautionary measures.
6. Activation of support and referral pathways.
7. Communication with headquarters when applicable.
8. Decision on internal investigation, external escalation, or both.
9. Coordination with XSM HR, partners, and local authorities as required.
10. Disciplinary, contractual, or corrective measures when applicable.
11. Closure report, recommendations, and monitoring plan.
12. Secure archiving of the case file and review of lessons learned.



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Flowchart in the Event of an Incident in a Fundación Xcalibur Program/Project





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Textual Action Flowchart

1. Identification of a concern, suspicion, complaint, or incident, whether observed directly or reported by a child, adolescent, family member, team member, partner, supplier, or third party.
2. Immediate Protection: If a present or imminent risk exists, ensure the safety of the child or adolescent and, when safe to do so, support their family, guardian, or trusted adult.
3. Immediate Communication to the Child and Adolescent Safeguarding Focal Point or to the designated alternative lead established by the Foundation. If the Focal Point is implicated, communication must be made directly to headquarters or to the corresponding higher authority.
4. Initial Record of the minimum necessary information, avoiding value judgments, unnecessary questioning, or any action that could revictimize the individual.
5. Initial Assessment of the risk, the urgency of the response, and the needs for protection, support, or referral.
6. Communication to Headquarters when applicable, especially if the case involves a person subject to this Policy, a partner, supplier, collaborator, a severe risk, a potential crime, or institutional impact.
7. Activation of Specialized Support or referral to protection services, healthcare, psychosocial support, legal assistance, or competent authorities, in accordance with the best interests of the child or adolescent and applicable legislation.
8. Decision on Internal Investigation, external escalation, or both, when the facts may constitute a breach of this Policy, the Code of Conduct, or legal obligations.
9. Coordination with Leadership, XSM HR, partners, suppliers, or authorities to implement precautionary, disciplinary, contractual, or corrective measures as appropriate.
10. Documented Case Closure, formulation of recommendations, subsequent monitoring, and review of lessons learned to strengthen institutional prevention and response.

Obligation to Report Concerns

Every person subject to this Policy has the duty to immediately report any suspicion, concern, incident, or information related to a potential risk or violation of this Policy. It is not the responsibility of the person reporting to determine whether the facts are proven; a reasonable concern is sufficient to activate the corresponding procedure.

The deliberate failure or omission to report a safeguarding concern involving children or adolescents may constitute a breach of this Policy and result in the corresponding internal, contractual, or disciplinary measures.

Reporting and Communication Channels

Fundación Xcalibur will provide secure, accessible, and confidential channels for reporting concerns or complaints. These channels must be made known to staff, volunteers, collaborators, partner organizations, suppliers, participating children and adolescents, families, and communities.



	Standard Operational Procedure	
PO.06	Reporting, Case Management, and Response Procedure	Page 4/9

Communications or reports may be made through the channels established by the Foundation, including, as appropriate:

- Direct communication to the Safeguarding Coordinator at headquarters;
- Direct communication to the safeguarding focal point or coordinator in the field;
- Communication to the project management or corresponding coordination;
- Email or institutional channel enabled for complaints/reporting;
- Community-based or in-person mechanisms adapted to the local context;
- Any other secure channel that allows for the activation of a safeguarding response.

When a report is received by a person who is not directly responsible for child and adolescent safeguarding, they must immediately forward it to the Safeguarding Coordinator at headquarters or the designated safeguarding focal point, strictly respecting confidentiality.

Minimum Indicative Timeframes

Action	Indicative Timeframe
Protect the child or adolescent from a current risk	Immediate
Notify the Focal Point or designated alternative	As soon as possible, ideally within the first 4 hours
Record initial information in writing	Within the first 24 hours
Assess initial risk and safeguarding needs	Within the first 24 hours
Adopt internal precautionary measures if applicable	Within 24-48 hours, or immediately if there is a severe risk
Activate support and referral	As soon as possible, ideally within 48-72 hours depending on urgency
Assess referral to authorities	Immediate if there is severe risk, a potential crime, or a legal obligation

Receipt and Recording of the Report

All received communications must be recorded securely, confidentially, and limited to necessary information. The record will be coordinated by the Safeguarding Coordinator at headquarters or the person designated for this purpose. In the field, the safeguarding focal point may support the initial collection of information, always under the criteria of confidentiality, the "need-to-know" principle, and the protection of the child or adolescent.

The Report must include, as far as possible:

- Date, time, and location of the report
- Name, role, and contact information of the person reporting, unless the report is anonymous.



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- Minimum details of the affected person: name if known, approximate age, sex/gender when relevant, location, and immediate needs.
- Objective description of facts observed or reported, avoiding opinions or unverified conclusions.
- Verbatim statements of the victim or complainant when relevant.
- Identification or description of the alleged perpetrator, if known.
- Immediate protective measures taken.
- Persons informed and exact time of notification.
- Current risks and referral needs.
- Signature or validation of the Focal Point.

The record must avoid value judgments, premature conclusions, or unnecessary information. The documentation will be maintained in a secure file with restricted access limited strictly to authorized personnel who must intervene in the case management.

Initial Case Assessment

Once the communication is received, the Safeguarding Coordinator at headquarters—supported by the field focal point where applicable—will perform or coordinate an initial assessment to determine:

- Whether an immediate risk exists for the child or adolescent;
- The nature and severity of the reported facts;
- The link between the facts and activities, staff, collaborators, or entities associated with the Foundation;
- The need to adopt urgent protective measures;
- The appropriateness of referring the case to specialized services or competent authorities;
- The type of internal response to be activated.

The initial assessment must be conducted diligently, prioritizing at all times the safety, well-being, and best interests of the child or adolescent. In case of doubt, the principle of protection shall prevail.

Immediate Protective Measures

When a present or potential risk exists for a child or adolescent, Fundación Xcalibur will adopt immediate protective measures. These measures will be coordinated by the Foundation's Leadership and/or the Safeguarding Coordinator at headquarters, supported by the field focal point when the incident occurs in a specific country, project, or activity.

- Depending on the nature of the case, measures may include:
- Ensuring that the child or adolescent is in a safe environment;



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- Preventively separating the alleged person involved from any contact with children or adolescents;
- Temporarily suspending duties, activities, or system access while the case is being assessed;
- Activating specialized psychosocial, medical, legal, or safeguarding support;
- Informing mothers, fathers, guardians, or legal representatives when appropriate and provided it does not increase the risk;
- Contacting competent authorities when there is a legal obligation or a severe risk;
- Adopting additional confidentiality measures and protection against retaliation.

These measures will be preventive and protective in nature. They shall not be interpreted as a sanction or as a premature confirmation of the facts.

Referral to Specialized Services or Competent Authorities

When required by the nature or severity of the facts, Fundación Xcalibur will refer the case to specialized services or competent authorities in accordance with applicable legislation in the country of operation and local protocols.

The referral must prioritize the safety of the child or adolescent, confidentiality, consent where applicable, and coordination with actors qualified to provide specialized support. In cases involving potential crimes, severe violence, exploitation, sexual abuse, trafficking, disappearance, life-threatening danger, or other situations of particular severity, the Foundation must act in compliance with applicable legal and safeguarding obligations.

The safeguarding focal point in the field may support the identification of available local services and the practical coordination of referrals, always under the supervision of the Safeguarding Coordinator at headquarters and within the limits of confidentiality and safety.

Internal Investigation or Institutional Analysis

When reported facts involve staff, volunteers, consultants, suppliers, partner organizations, or any person associated with Fundación Xcalibur, the Foundation may initiate an internal investigation or institutional analysis to determine whether there has been a breach of this Policy, the Code of Conduct, or other applicable obligations.

The internal investigation must be conducted with impartiality, confidentiality, diligence, and respect for the rights of all individuals involved. Any action that could revictimize the child or adolescent, interfere with investigations by competent authorities, or increase existing risks must be avoided.

The individual or team responsible for the investigation must act free from conflicts of interest. When independence or sufficient technical capacity cannot be guaranteed, the Foundation may engage specialized external support.



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Child and Adolescent-Centered Approach

Throughout the entire procedure, Fundación Xcalibur will apply a child and adolescent-centered approach. This entails prioritizing their safety, dignity, well-being, privacy, the right to be heard, and the right to receive information suited to their age and maturity.

Decisions must be made in accordance with the principle of the best interests of the child or adolescent. The participation of the child or adolescent in the process must occur only when necessary, in a safe, respectful, and adapted manner, avoiding repeated or unnecessary interviews.

Confidentiality and Information Protection

All information related to a report, suspicion, or safeguarding incident involving children and adolescents shall be handled with strict confidentiality. Information may only be shared with individuals who need to know it in order to ensure appropriate protection, assessment, referral, investigation, or response.

Confidentiality shall not prevent communication with competent authorities, specialized services, or mandated entities when there is a legal obligation, severe risk, or protection need. In such cases, the information shared must be limited strictly to what is necessary.

Protection Against Retaliation

Fundación Xcalibur will not tolerate retaliation against any person who reports a concern in good faith, participates in an investigation, provides support to an affected person, or collaborates with the enforcement of this Policy.

Any act of intimidation, threat, retaliation, unfavorable treatment, or pressure related to a child and adolescent safeguarding report or communication will be considered a serious breach and may result in disciplinary, contractual, or institutional measures.

Case Closure and Final Measures

The closure of a case must be documented securely and confidentially. The documentation must include the assessment conducted, the protective measures adopted, the referrals made, the conclusions of the internal analysis or investigation, the decisions taken, and any follow-up recommendations.

When a breach of this Policy is confirmed, Fundación Xcalibur will adopt measures proportional to the gravity of the facts and the individual's relationship with the Foundation. These measures may include formal warnings, mandatory training, modification of duties, suspension, termination of the employment or contractual relationship, exclusion from activities, termination of agreements with partner organizations, communication with competent authorities, or other measures necessary to prevent new risks.



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Subsequent Follow-Up and Learning

Following the closure of a case, Fundación Xcalibur will assess whether follow-up measures are necessary to ensure the continued protection of the child or adolescent, prevent retaliation, reinforce prevention measures, or improve the institutional response.

The lessons learned from case management must be used to review procedures, strengthen training, adjust risk analyses, and improve the Foundation's child and adolescent safeguarding mechanisms.



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Annex 2: Minimum Incident Reporting Form

- Date, time, and location of the report.
- Name, role, and contact details of the person reporting, unless the report is submitted anonymously.
- Minimum details of the affected person: name (if known), approximate age, sex/gender (when relevant), location, and immediate needs.
- Objective description of observed or reported facts, avoiding unverified opinions or conclusions.
- Verbatim statements of the victim or complainant, when relevant.
- Identification or description of the alleged perpetrator, if known.
- Immediate protective measures implemented.
- Persons informed and exact time of notification.
- Current risks and referral requirements.
- Signature or validation of the Focal Point.

Annex 3: Guidelines for Receiving a Disclosure from a Child or Adolescent

- Ensure safety first: Is the child or adolescent safe? If not, make their immediate safety the top priority.
- Be available to talk, recognizing that the victim may not disclose at a time expected by adults.
- Listen attentively without interrupting.
- Ask only minimal clarifying questions; do not investigate or probe.
- Take every disclosure seriously, even in the absence of visible injuries.
- Create a safe, private, and calm environment.
- Remain calm and refrain from displaying shock, horror, or disbelief.
- Reassure the child or adolescent, letting them know they were right to speak up and that they are not to blame.
- Acknowledge how difficult making the disclosure may have been.
- Explain the next steps honestly, in an age-appropriate manner.
- Do not promise absolute confidentiality.
- Act without delay.
- Do not prejudice, make assumptions, or assign blame.
- Contact the Focal Point or designated alternative lead immediately.
- Complete a written report as soon as possible.
- Provide information on available, child-friendly support services.