

Policy on the Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH)



Index

PART I. PSEAH Policy	3
1. Introduction, Purpose, and Framework	3
1.1. Purpose of the Policy	3
1.2. Situations Covered by this Policy	3
1.3. Reference Framework	4
2. About Fundación Xcalibur and Institutional Commitment	4
3. Scope, Application, and Mandatory Acceptance	5
3.1. Persons Subject to this Policy	5
3.2. Persons Protected by this Policy	5
3.3. Activities and Contexts Covered	5
3.4. Contractual and Institutional Acceptance	6
4. Key definitions	6
5. Guiding principles	8
6. Standards of Conduct and Prohibitions	8
6.1. Strictly Prohibited Conduct	8
6.2. Mandatory Conduct	9
7. Roles and Responsibilities	10
8. Non-Compliance, Disciplinary, and Corrective Measures	10
9. Monitoring, Evaluation, and Review	11
10. Entry into Force, Approval, and Updating	11
 PART II. Operational Implementation of the Policy	 12
1. Operational Procedures	12
2. PSEAH Operational Coordination and Procedures	12
3. Working with Partners, Vendors, and Third Parties	20
4. Information, Communication, and Technology (ICT)	23
Annex 2: Minimum Incident Reporting Form	32
Annex 3: Guide for Receiving a Disclosure from a Child or Adolescent	32



PART I. PSEAH Policy

1. Introduction, Purpose, and Framework

Sexual exploitation, sexual abuse, and sexual harassment constitute severe violations of human dignity, human rights, and the core values of the Fundación Xcalibur. These behaviors are unacceptable, may constitute criminal offenses, and are incompatible with any employment, contractual, volunteer, institutional, or collaborative relationship with the Foundation.

Fundación Xcalibur maintains a zero-tolerance policy regarding sexual exploitation, sexual abuse, and sexual harassment. Zero tolerance means that every concern, suspicion, allegation, or incident must be taken seriously, reported through established channels, and managed in a diligent, safe, confidential, and victim/survivor-centered manner.

This Policy establishes the minimum commitments, standards, responsibilities, and procedures to prevent, identify, report, and respond to sexual exploitation, sexual abuse, and sexual harassment across all programs, activities, institutional relationships, communications, and operations of Fundación Xcalibur.

1.1. Purpose of the Policy

The purpose of this Policy is to prevent and respond to any form of sexual exploitation, sexual abuse, and sexual harassment that may occur within the framework of the activities, programs, institutional relationships, or operations of Fundación Xcalibur. To this end, it integrates measures for prevention, protection, reporting, assistance, investigation, accountability, and continuous improvement.

Specifically, this Policy aims to:

- Create and maintain safe, respectful environments free from sexual exploitation, sexual abuse, and sexual harassment.
- Establish clear standards of conduct and express prohibitions for all individuals subject to this Policy.
- Integrate preventive measures into governance, human resources, program management, procurement, communications, and work with partners and vendors.
- Ensure safe, accessible, and confidential channels for reporting concerns, suspicions, complaints, or incidents.
- Guarantee a victim/survivor-centered response that is sensitive to age, gender, disability, diversity, and context.
- Promote accountability, proper investigation, disciplinary or contractual measures, and institutional improvement.

1.2. Situations Covered by this Policy

The following situations, among others, must be reported and managed in accordance with this Policy:

- Sexual exploitation, sexual abuse, sexual harassment, sexual violence, or inappropriate sexual conduct.
- The actual or attempted exchange of money, employment, goods, services, assistance, opportunities, or benefits for sex, sexual favors, or other conduct of a sexual nature.



- Sexual or romantic-sexual relationships with beneficiaries or participants where a relationship of power, dependency, trust, influence, or access to resources exists.
- Any sexual activity, sexual contact, or sexualized conduct with any person under 18 years of age, regardless of the local age of consent.
- Sexual harassment among staff, collaborators, volunteers, partners, vendors, or any individual linked to the Foundation.
- Unwanted comments, insinuations, messages, images, requests, pressures, or contacts of a sexual nature, including via digital media.
- Conduct involving grooming, coercion, sextortion, recruitment, intimidation, or manipulation for sexual purposes.
- Retaliation, threats, or pressure against victims, survivors, whistleblowers, witnesses, or individuals collaborating in good faith.
- The deliberate failure to report a concern or suspicion of sexual exploitation, sexual abuse, or sexual harassment.

1.3. Reference Framework

This Policy is inspired by and aligned with the following instruments, standards, and reference documents:

- United Nations Secretary-General's Bulletin ST/SGB/2003/13, Special measures for protection from sexual exploitation and sexual abuse.
- Inter-Agency Standing Committee (IASC) Core Principles Relating to Sexual Exploitation and Abuse.
- UNICEF's Policy on Protection from Sexual Exploitation and Abuse and other guidelines from international bodies on PSEA/PSEAH.
- International best practices in prevention, reporting, victim/survivor assistance, investigation, confidentiality, non-revictimization, and protection from retaliation.
- Applicable national legislation in Spain and in countries where the Fundación Xcalibur operates.
- The Child and Adolescent Protection Policy of the Fundación Xcalibur, when the situation directly or indirectly affects a person under 18 years of age.
- Code of Conduct, Human Resources procedures, data protection regulations, whistleblower channel, and other internal policies of the Fundación Xcalibur.

In the event of a conflict or interpretive doubt between internal documents, the interpretation offering the highest level of protection to the victim or survivor and, where applicable, to the affected child or adolescent shall prevail.

2. About Fundación Xcalibur and Institutional Commitment

Fundación Xcalibur is a private, independent, non-profit entity headquartered in Madrid, dedicated to international development cooperation and to improving opportunities for vulnerable children, adolescents, youth, and women. Its work is structured around education, gender equality, environmental action, and community strengthening.



The Foundation recognizes that its work may generate relationships of trust, dependency, influence, or power with beneficiaries, communities, partners, vendors, volunteers, and staff. These relationships may create specific risks of sexual exploitation, sexual abuse, or sexual harassment if clear rules, supervision, reporting channels, and accountability mechanisms are not in place.

The Foundation strictly prohibits all forms of sexual exploitation, sexual abuse, or sexual harassment. No institutional, financial, programmatic, communication, or reputational objective shall justify conduct that violates the dignity, freedom, security, or rights of individuals.

3. Scope, Application, and Mandatory Acceptance

This Policy applies to Fundación Xcalibur in Spain and to all its international structures, offices, programs, projects, representations, alliances, and activities, regardless of the legal form or country of operation.

3.1. Persons Subject to this Policy

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

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

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. Persons Protected by this Policy

This Policy protects any person who may be affected by sexual exploitation, sexual abuse, or sexual harassment within the framework of the activities, programs, or institutional relationships of Fundación Xcalibur, including beneficiaries, participants, communities, staff, volunteers, consultants, partners, vendors, and third parties.

The Policy pays special attention to beneficiaries or participants, children and adolescents, women and girls, persons with disabilities, persons dependent on assistance, individuals in situations of vulnerability, displaced persons, individuals with linguistic or cultural barriers, and anyone exposed to power imbalances, dependency, or unequal access to resources.

3.3. Activities and Contexts Covered

This Policy applies to in-person, virtual, or hybrid activities, programs, projects, meetings, workshops, events, travel, field visits, training, institutional communications, social media, recruitment processes, relationships with partners and vendors, distribution of goods or services, and any other context linked to Fundación Xcalibur.



It may also apply to conduct occurring outside professional working hours or spaces when there is a link to Fundación Xcalibur, when the individual acts or is perceived as a representative of the Foundation, or when the conduct may impact the safety, dignity, rights, or trust of beneficiaries, participants, staff, or communities.

3.4. 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 requiring 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 once they have been informed of its content, participate in Foundation activities, or act for, with, or on behalf of Fundación Xcalibur.

4. Key definitions

When a more protective legal, contractual, or institutional definition exists in the applicable jurisdiction, the definition providing the higher degree of protection to the victim or survivor and, where applicable, to the affected person under 18 years of age, shall apply.

Term	Definition
Sexual exploitation	The actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including, but not limited to, profiting monetarily, socially, politically, programmatically, or institutionally from the exploitation of another.
Sexual abuse	The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal, coercive, dependent, confidential, or abuse-of-power conditions.
Sexual harassment	Any unwelcome conduct of a sexual nature—verbal, non-verbal, physical, or digital—that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment.
Sexual Violence	Any sexual act, attempt to obtain a sexual act, or unwanted sexual comment, advance, or action directed against a person's sexuality using coercion, power, threat, manipulation, or abuse of trust.
Child sexual exploitation, abuse, and harassment	Any form of sexual exploitation, sexual abuse, sexual harassment, grooming, coercion, production, or dissemination of child sexual abuse material, or sexualized conduct affecting a person under 18 years of age.
Sexual activity with minors	Any sexual activity with a person under 18 years of age, strictly prohibited by this Policy regardless of the local age of consent. Mistaken belief regarding age shall not constitute justification.
Digital sexual harassment	Sexual harassment carried out through social media, messaging apps, digital platforms, emails, phone calls, images, audio files, videos, geolocation, or other technological means.
Grooming	The process by which an individual establishes or attempts to establish a relationship of trust, dependency, or manipulation for sexual purposes, particularly with children, adolescents, or vulnerable persons.
Sextortion	A form of coercion or extortion involving threats to disclose intimate images, messages, information, or sexual content to demand sex, sexual favors, silence, money, goods, benefits, or control over a person.
Child sexual abuse	Any representation, image, video, audio file, text, or material depicting,



material	describing, sexualizing, or exploiting a person under 18 years of age. Its possession, production, solicitation, retention, transmission, or dissemination is strictly prohibited.
Free and informed consent	Consent given voluntarily, specifically, knowingly, and reversibly, without coercion, manipulation, deceit, pressure, dependency, or abuse of power. Consent may be deemed invalid in situations involving power imbalances, dependency, or minority age.
Victim or survivor	An individual who has suffered, or is alleged to have suffered, sexual exploitation, sexual abuse, sexual harassment, sexual violence, retaliation, or any other violation related to this Policy.
Complainant	Any person who reports in good faith a concern, suspicion, allegation, or incident, whether they are a victim, survivor, witness, family member, staff member, partner, vendor, or third party.
Alleged perpetrator	An individual regarding whom there is suspicion, an allegation, or information linking them to possible conduct contrary to this Policy, without prejudging the facts or their liability.
Retaliation	Any direct or indirect action or omission that harms, threatens, intimidates, penalizes, or discriminates against a person for reporting, cooperating, testifying, or participating in good faith in the management of a case.
Revictimization	Additional suffering caused by inadequate responses, unnecessary exposure, traumatic repetition of the account, victim-blaming, lack of confidentiality, or stigmatizing treatment.
Confidentiality	The principle requiring access to information regarding cases, victims, complainants, witnesses, and alleged perpetrators to be restricted strictly to those who need to know it to protect, respond, investigate, or comply with legal obligations.
Persons subject to this Policy	All individuals working for, on behalf of, or with the Fundación Xcalibur or any of its structures, including staff, volunteers, governing bodies, consultants, vendors, contractors, implementing partners, and linked third parties.
Stakeholders	Individuals, groups, or organizations that participate in, are affected by, or have responsibilities related to the Fundación Xcalibur activities, including communities, beneficiaries, staff, partners, authorities, specialized services, and donors.
PSEAH Focal Point	The person designated to act as the contact point, guidance lead, and activator of procedures relating to sexual exploitation, sexual abuse, and sexual harassment, including report intake, initial support, referral, and coordination with headquarters or authorities where applicable.



5. Guiding principles

The guiding principles establish the ethical and operational framework for preventing and responding to sexual exploitation, sexual abuse, and sexual harassment. They must guide all decisions, actions, programs, employment relationships, partnerships, and institutional responses of Fundación Xcalibur.

- **Zero Tolerance:** No form of sexual exploitation, sexual abuse, or sexual harassment will be tolerated. Every concern shall be taken seriously and managed in accordance with this Policy.
- **Do No Harm:** Activities and decisions must be designed and executed in a manner that does not increase risks or cause additional harm to beneficiaries, communities, staff, or victims/survivors.
- **Victim/Survivor-Centered Approach:** The safety, dignity, privacy, well-being, informed choice, and needs of the affected person shall guide the response.
- **Best Interests of the Child or Adolescent:** When the affected person is under 18 years of age, all decisions shall prioritize their safety, well-being, rights, and holistic development.
- **Confidentiality and Data Protection:** Information shall be handled with restricted access, strictly on a need-to-know basis, and with appropriate security measures.
- **Protection against Retaliation:** Retaliation against victims, whistleblowers/complainants, witnesses, or individuals collaborating in good faith is strictly prohibited.
- **Non-Discrimination and Inclusion:** Prevention and response measures shall be applied without discrimination, taking into account gender, age, disability, language, culture, sexual orientation, gender identity, origin, nationality, religion, socioeconomic status, or any other circumstances.
- **Due Process:** The management of complaints and investigations must respect impartiality, the presumption of innocence, the right to be heard, and proportionate measures.
- **Accountability:** The Foundation shall adopt disciplinary, contractual, corrective, or legal measures when appropriate, and shall review its systems to prevent recurring risks.
- **Participation and Accessibility:** Beneficiaries, communities, and staff must be informed of the standards, reporting channels, and support mechanisms in an understandable and adapted manner.

6. Standards of Conduct and Prohibitions

All persons subject to this Policy must maintain respectful, professional, and appropriate conduct, avoiding any behavior that may constitute sexual exploitation, sexual abuse, sexual harassment, abuse of power, manipulation, coercion, or degrading treatment.

6.1. Strictly Prohibited Conduct

- Committing, attempting to commit, facilitating, covering up, or tolerating sexual exploitation, sexual abuse, or sexual harassment.
- Engaging in sexual activity, sexual contact, sexual advances, or sexualized conduct with a person under 18 years of age, without exception.
- Exchanging or attempting to exchange money, employment, goods, assistance, services, opportunities, grades, awards, protection, or benefits for sex, sexual favors, or other conduct of a sexual nature.



- Engaging in sexual or romantic-sexual relationships with beneficiaries or participants when a relationship of power, dependency, trust, influence, access to resources, or risk of exploitation exists.
- Requesting, sending, retaining, producing, disseminating, or threatening to disseminate intimate or sexual images, messages, audio files, or content.
- Using digital media, social networks, messaging applications, or personal phones to make approaches, advances, grooming, sextortion, harassment, or sexual pressure.
- Making sexual comments, jokes, insinuations, gestures, unwanted touching, staring, persistent invitations, exhibitionism, or any unwelcome sexual conduct.
- Using position, role, authority, assistance, or access to resources to pressurize, manipulate, intimidate, or condition a person for sexual purposes.
- Retaliating against individuals who report, collaborate, testify, or participate in good faith in a procedure related to this Policy.
- Issuing or retaining unnecessary, stigmatizing, or unauthorized information about victims, survivors, complainants, or alleged perpetrators.

6.2. Mandatory Conduct

- Acting with respect, integrity, professionalism, and clear boundaries in all relationships with beneficiaries, participants, communities, colleagues, partners, and vendors.
- Immediately reporting any concern, suspicion, allegation, or incident, even if unconfirmed.
Cooperating in good faith with assessment, support, investigation, or follow-up procedures.
- Maintaining confidentiality and sharing information solely with authorized individuals under the need-to-know principle.
- Avoiding situations that may create dependency, favoritism, isolation, manipulation, or conflicts of interest.
- Seeking guidance from the PSEA/PSEAH Focal Point whenever doubts arise regarding conduct, relationships, risks, or decisions.



7. Roles and Responsibilities

Prevention and response to sexual exploitation, sexual abuse, and sexual harassment is an institutional and shared responsibility. The existence of focal points or coordinators does not replace the obligation of all persons subject to this Policy to prevent risks, respect standards of conduct, report concerns, and cooperate with response measures.

Role	Main Responsibilities
Board of Trustees and Governing Bodies	Approve the Policy, oversee its implementation at a strategic level, promote a zero-tolerance culture, and ensure resources, independence, and accountability.
Foundation Management	Guarantee the effective implementation of the Policy, appoint responsible parties, adopt preventive, corrective, disciplinary, or contractual measures, and ensure institutional coordination.
HQ PSEA/PSEAH Coordinator or Focal Point	Coordinate the institutional application of the Policy, support local focal points, receive reports, guide protection and referral measures, coordinate with management and HR, maintain confidential records, promote training, and formulate improvement recommendations.
Field PSEA/PSEAH Focal Point	Act as a local operational reference, support risk assessments, receive initial communications, escalate reports to HQ, maintain referral pathways, facilitate accessible information, and promote immediate protection measures.
Human Resources	Integrate PSEAH into safe recruitment, contracts, onboarding, training, precautionary measures, disciplinary actions, and employment records.
Programs and Projects Teams	Integrate PSEAH risk assessments into activities, inform communities and beneficiaries, apply mitigation measures, and report any concerns.
Communications and IT	Ensure the safe use of images, testimonials, data, and digital channels; prevent digital harassment, sextortion, and undue exposure; and support the protection of information and evidence.
Partners, Vendors, and Third Parties	Comply with PSEAH clauses, prevent risks, report incidents, cooperate with case management, and adopt corrective measures when applicable.
All Persons Subject to this Policy	Know, accept, and comply with the Policy; act with respect; prevent risks; report concerns; and cooperate with support, investigation, and follow-up measures.

The PSEAH Coordinator or Focal Point shall not conduct informal investigations, interrogate victims or survivors, replace specialized professionals, or unilaterally decide on disciplinary or criminal liabilities. Their role is to provide guidance, activate procedures, safeguard confidentiality, ensure immediate measures, and escalate decisions to the competent authorities.

8. Non-Compliance, Disciplinary, and Corrective Measures

Non-compliance with this Policy may constitute a serious breach and result in administrative, disciplinary, contractual, civil, or criminal measures, in accordance with applicable legislation and the existing relationship with the person or entity involved.

- Formal warning, corrective training, enhanced supervision, or restriction of duties.
- Precautionary suspension of duties, access to programs, contact with beneficiaries, or institutional representation.



- Termination of employment contract, volunteer agreement, consultancy, partnership agreement, collaboration, or relationship with a partner/vendor.
- Referral to competent authorities when there are indications of a crime or a legal obligation to report.
- Remedial measures, prevention, institutional improvement, and review of internal controls.
- Updating of procedures, training, or contractual clauses when the case reveals systemic gaps.

The adoption of internal measures does not replace the obligations to notify, refer, or cooperate with competent authorities where applicable. Confidentiality must be maintained during any investigation or case management, without prejudice to sharing necessary information to protect or comply with legal obligations.

9. Monitoring, Evaluation, and Review

Fundación Xcalibur will monitor the implementation of this Policy to ensure its effective application, identify opportunities for improvement, and strengthen prevention and response to sexual exploitation, sexual abuse, and sexual harassment.

- Percentage of trained or sensitized individuals.
- Operation of reporting channels and confidentiality measures.
- Inclusion of PSEA/PSEAH clauses in contracts, agreements, and partnerships.
- Performance of risk assessments in relevant programs, partners, and contexts.
- Aggregate record of concerns, incidents, responses, and corrective measures.
- Evaluation of referral pathways and support for victims or survivors.
- Review of systemic gaps and institutional learning.

Monitoring information must be handled on an aggregated and confidential basis, avoiding the identification of victims, complainants, witnesses, or alleged perpetrators, except when strictly necessary for protection purposes, case management, or legal obligations.

10. Entry into Force, Approval, and Updating

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

Any substantial modification must be reviewed and approved in accordance with the Foundation's internal procedures. Updated versions shall replace previous ones from the determined date of entry into force.



PART II. Operational Implementation of the Policy

1. Operational Procedures

Operational procedures set forth the practical application of this Policy and establish the measures necessary to prevent, identify, report, and respond to any situation of sexual exploitation, sexual abuse, or sexual harassment linked to the programs, activities, individuals, or institutional relationships of Fundación Xcalibur.

This part must be read as complementary to the guiding principles, standards of conduct, Code of Conduct, and other applicable internal policies. Its purpose is to ensure that the protection of children and adolescents translates into concrete, traceable, and coherent actions across all intervention contexts of the Foundation.

The operational application of the Policy shall be developed, at a minimum, through the following lines of action: training and awareness-raising; safe programming; information for children, adolescents, families, and communities; safe recruitment; work with partners and vendors; digital communication and protection; reporting, case management, and assistance; monitoring and continuous improvement.

2. PSEAH Operational Coordination and Procedures

The implementation of these procedures shall be coordinated by the HQ PSEAH Coordinator, with the support of field protection focal points or coordinators where applicable. Their specific functions are described in Part I of this Policy.

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

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

Integration of child and adolescent protection into the design and management of programs and activities.

- Risk analysis and mitigation for children and adolescents.
- Safe recruitment of staff, volunteers, consultants, vendors, and partner organizations.
- Training and awareness-raising of individuals linked to the Foundation.
- Adapted information for children, adolescents, families, and communities.
- Safe use of images, testimonials, and personal data.
- Establishment of safe and accessible reporting channels.
- Assignment of clear responsibilities at headquarters and in the field.
- Monitoring, documentation, and periodic review of protection measures.

These actions shall be applied proportionally to the type of activity, the level of contact with children and adolescents, the intervention context, and the identified risks.



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

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

Mandatory Initial Training

All staff members, interns, and volunteers linked to projects involving children must receive mandatory training covering:

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

Delivery of manuals accompanied by written confirmation of reading and studying them may be deemed mandatory training. Specific online courses on the subject matter will also be provided. Depending on the context, and whenever possible, local partners will be included in training sessions.

Continuous Training

- All staff and volunteers shall have the opportunity to update their knowledge of child and adolescent protection as needed through periodic training sessions and team discussions.
- 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, management of risk situations, 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.
- Records must include the date of the training, a full list of participants, and any relevant materials used during the session.

Support and Guidance

- It is recognized that all adults share the responsibility to protect children, but no one should undertake this task in isolation.
- Fundación Xcalibur shall formally designate a Protection Coordinator or Focal Point in every context where it conducts activities and where deemed necessary based on the risk level, program nature, or operational structure.



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

- Protection 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.
- Any request for assistance or guidance regarding child and adolescent protection must be taken seriously and never interpreted as a lack of competence on the part of the requester.
- If an individual linked to the Foundation is involved in a child and adolescent protection incident—whether as a subject of investigation or as a witness—they will be provided with the necessary support, which may include additional supervision and/or specialized psychological or emotional support.



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

Protection Risk Assessment and Management

Every program, project, or activity involving direct, indirect, digital, or communication contact with children and adolescents must incorporate a prior protection risk assessment. This assessment must be conducted 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.

The risk assessment shall not be a one-off exercise. It must be reviewed during execution and upon closure of activities to identify changes in the context, adjust mitigation measures, and document learnings for future interventions.

The risk analysis must consider, among other aspects:

- The age, gender, vulnerability situation, 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, vendors, visitors, or other collaborators;
- Travel, 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 derived from the local context, including insecurity, discrimination, violence, exploitation, abuse, neglect, or social exclusion.

When risks are identified, Fundación Xcalibur must adopt proportionate mitigation measures and document them prior to the start of the activity. These measures may include, among others, adjustments in supervision, modification or cancellation of activities, additional accompaniment, access restrictions, reinforcement of standards of conduct, adaptation of spaces, specific information for families or adult guardians, additional team training, or 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

Programs, projects, and activities Fundación Xcalibur must be designed and executed in a manner that promotes safe, inclusive, respectful, and appropriate environments for children and adolescents. Protection must be integrated into planning, budgeting, space selection, team composition, partnerships, communication with families, information management, and monitoring mechanisms.



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

In particular, it must be ensured that:

- Activities are appropriate for the age, maturity, capabilities, and circumstances of the participating children and adolescents;
- Clear criteria for adult supervision, accompaniment, and team responsibilities are in place;
- Situations of unjustified one-on-one isolation between an adult and a child or adolescent are avoided;
- Physical and digital spaces are safe, accessible, and appropriate for the intended activity;
- Children and adolescents receive understandable information about their rights, rules of conduct, and channels to seek help or report a concern;
- Families, legal guardians, or community reference figures are informed where appropriate;
- Activities are conducted under principles of inclusion, equality, non-discrimination, and respectful treatment;
- Staff, volunteers, partners, and vendors involved possess the necessary information, training, and support to apply this Policy.

Prior to carrying out activities with children and adolescents, written informed consent from parents or legal guardians, as well as the informed assent of the children or adolescents themselves according to their age and maturity, shall be obtained where applicable. This obligation shall also apply 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 shall be explained clearly and understandably by a team member. In such cases, acceptance may be formalized through a mark, fingerprint, or other valid means in the presence of a witness, in accordance with the context and applicable legislation.

Fundación Xcalibur shall 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 shall receive ongoing support and have spaces available to raise questions, review risk situations, and share learnings—for example, through team meetings, supervision sessions, informal discussions, or case analyses. Protection measures shall be reviewed during execution and upon completion of the activity in order to make timely adjustments and improve future interventions.



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

Risk Assessment Checklist

Before starting an activity, program, or project involving direct, indirect, digital, or communication contact with children and adolescents, the responsible team must verify, at a minimum, the following questions:

- ☐ Does the activity involve direct, indirect, digital, or communication contact with children and adolescents?
- ☐ Have physical, emotional, sexual, digital, transport, accommodation, or public exposure risks been identified?
- ☐ Have supervision measures, appropriate ratios, safe spaces, and designated responsible persons been defined?
- ☐ Are all necessary authorizations and consents in place?
- ☐ Have the staff, volunteers, partners, and vendors involved been informed, trained, and, where applicable, vetted/screened?
- ☐ Do children and adolescents know their rights, the rules of conduct, and how to access channels to seek help?
- ☐ Have families, legal guardians, or community leaders been informed where applicable?
- ☐ Are partners and vendors aware of this Policy and the available reporting channels?
- ☐ Are referral pathways in place to access protection services, health care, psychosocial support, or legal assistance?
- ☐ 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 all risk mitigation measures been documented?
- ☐ Are the residual risks acceptable? (If they are not, the activity must not proceed).



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

Fundación Xcalibur shall 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 conduct, and the available channels for reporting concerns or requesting support.

The 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 the Fundación Xcalibur activities, essential information regarding the Policy and protection channels shall be communicated in kickoff meetings or sessions and recorded using a monitoring document. Where relevant, the Foundation may utilize visual materials, information sessions, verbal explanations, signage, participatory dynamics, or other accessible formats.



	Operational Procedure	
PO.04	Safe Recruitment	Page 1/1

Safe Selection of Staff, Volunteers, and Collaborators

Fundación Xcalibur shall apply safe recruitment and selection criteria for all individuals who may have direct, indirect, digital, or communication contact with children and adolescents. Safe selection is an essential component of prevention and aims to reduce the risk of engaging 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:

- Verification of identity and professional references;
- Background checks where legally permissible and relevant;
- Interviews that incorporate suitability criteria for working with children and adolescents;
- Formal acceptance of this Policy and the Code of Conduct;
- Inclusion of child and adolescent protection clauses in contracts, agreements, and collaboration partnerships;
- Mandatory training or awareness sessions prior to commencing activities involving children and adolescents.



3. Working with Partners, Vendors, and Third Parties

Fundación Xcalibur shall integrate child and adolescent protection into its relationships with partner organizations, vendors, contractors, subcontractors, and other third parties linked to its activities, programs, services, or communications.

Where direct or indirect contact with children and adolescents exists, the Foundation shall assess the third party's alignment with the principles of this Policy, their track record of working with minors, the existence of equivalent standards, and their capacity to prevent, report, and respond to protection incidents.

Agreements, partnerships, or contracts must include, where applicable, protection clauses, acceptance of this Policy or equivalent standards, reporting obligations, cooperation in incident management, and the right to adopt corrective measures, suspend, or terminate the relationship in the event of non-compliance.

Safe selection and due diligence measures shall be adapted to the anticipated level of contact and risk. In exceptional cases of urgent onboarding, mitigation measures must be applied—such as enhanced supervision, limitation of duties, and a prohibition on working alone with children or adolescents—until all required verifications are completed.

The existence of a suspicion or incident linked to a third party shall not automatically imply the termination of the relationship. The Foundation shall evaluate the severity of the case, the safety of the minor, the third party's cooperation, the corrective measures adopted, and the ongoing risk.



	Operational Procedure	
PO.05	Prevention of Sexual Exploitation, Abuse, and Harassment in Digital and Communication Environments	Page 2/3

Fundación Xcalibur shall guarantee that the collection, 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.

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

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

Photos and Videos for Media

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

Service providers who may intervene in the context of these images shall have no rights to use them, as they remain for the exclusive use of Fundación Xcalibur. Such rights may be granted in the context of communications by the Fundación Xcalibur financial partners.

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

1. Comply with this Policy and its procedures.
2. No information shall be published that could identify children or adolescents and put them in danger, particularly when they are victims of violence, nor any sensitive or excessively detailed information.
3. Be accompanied by an Fundación Xcalibur collaborator when conducting a report (photos, videos, etc.).
4. Always respect the dignity of the child or adolescent. They shall not be depicted as passive, weak, or hopeless victims, nor in a sensationalist manner.
5. Images and stories must portray children and adolescents in a dignified, positive, and respectful manner, highlighting their capacities, strengths, and context, and avoiding the dramatization of their experience.
6. Ensure that the child or adolescent does not pose in an inappropriate or sexualized manner, or in a way that could harm them or another person.
7. Do not capture or publish photographs or videos of children or adolescents who are unclothed, inappropriately dressed, or in degrading, exploitative situations, or situations that could cause them harm.
8. Capturing photos or videos is strictly reserved for professional use by Fundación Xcalibur



	Operational Procedure	
PO.05	Prevention of Sexual Exploitation, Abuse, and Harassment in Digital and Communication Environments	Page 2/3

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

Online Protection and Safety

13. Coordinators shall ensure that staff, volunteers, partners, and collaborators receive sufficient guidance on the appropriate use of technologies, including the internet, mobile phones, social media, messaging apps, and digital platforms.
14. Filtering and blocking software must be installed to prevent access to inappropriate or offensive content. In general, all sites that incite child abuse or contain images and information harmful to children must be blocked.
15. In the event of receiving offensive content, unsolicited messages/chats, or harmful materials, these must be reported to the Child and Adolescent Protection Focal Point, who will route them, when applicable, to the IT or systems department to implement appropriate protective and preventive measures.
16. In the event of accidentally receiving or uploading child sexual abuse material (CSAM) or other illegal or harmful content, it must not be forwarded, downloaded, copied, or attached to a report, unless expressly instructed by a competent authority. The situation must be reported immediately through established channels, preserving security, confidentiality, and data integrity.
17. Staff, volunteers, and collaborators must also report any offensive, illegal, or harmful content received or accidentally uploaded to their direct supervisor or the designated channel.



4. Information, Communication, and Technology (ICT)

Fundación Xcalibur has its own rules regarding IT and technology management.

The basic principle is to respect and protect the dignity of children and adolescents, as well as that of their families and communities. The right to privacy of children and young people must always be taken into account.

IT equipment is provided as part of professional duties, and its use is subject to this Policy, internal regulations on the use of technological tools, and applicable data protection legislation.



	Operational Procedure	
PO.05	Prevention of Sexual Exploitation, Abuse, and Harassment in Digital and Communication Environments	Page 3/3

- The use of computers and technological resources for personal use is not permitted.
- Access to professional equipment, systems, or files shall be carried out only when necessary, proportionate, and in compliance with applicable regulations, internal policies on the use of technological media, 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 intentional access to illegal, harmful websites or content that violates 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.



	Operational Procedure	
PO.06	Reporting, Case Management, and Response Procedure	Page 1/8

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 with a primary focus on the best interests of the child or adolescent.

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

The headquarters Protection Coordinator shall be responsible for ensuring the proper activation and monitoring of the procedure, without prejudice to the responsibilities of the Foundation's Directorate and project teams. In the field, the corresponding protection focal point or coordinator shall support risk identification, the initial reception of concerns, the adoption of urgent measures, and immediate communication with headquarters, in accordance with the defined channels.

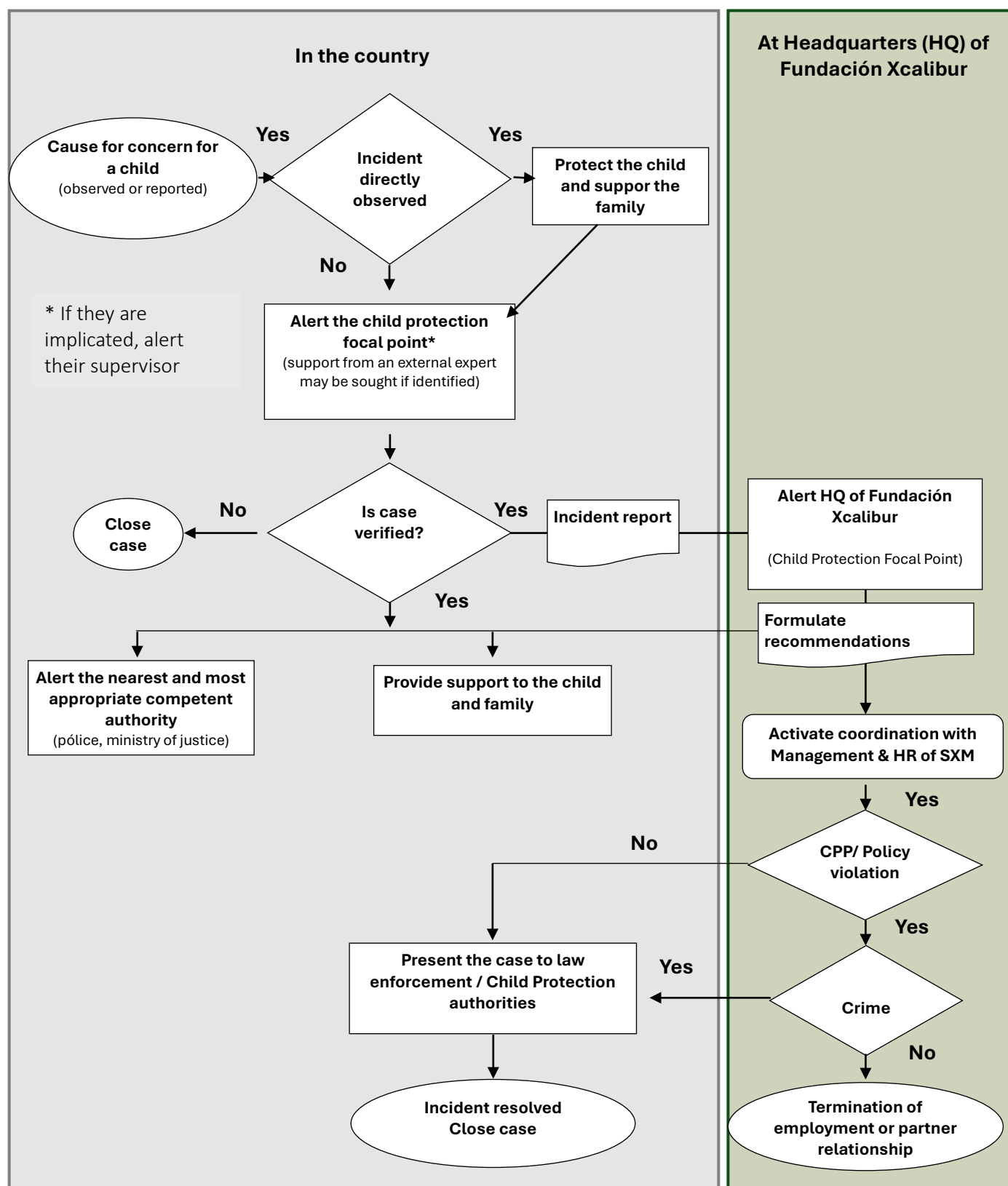
The operational procedure for reporting, investigation, and assistance can be summarized as follows:

1. Detection or receipt of concern.
2. Immediate protection of the child or adolescent.
3. Notification to the Focal Point or alternative person in charge.
4. Initial written record.
5. Initial risk assessment and precautionary measures.
6. Activation of support and referral.
7. Communication to headquarters where applicable.
8. Decision on internal investigation, external referral, or both.
9. Coordination with Human Resources, partners, and authorities as applicable.
10. Disciplinary, contractual, or corrective measures where applicable.
11. Closure report, recommendations, and follow-up plan.
12. Secure case archiving and review of lessons learned.



	Operational Procedure	
PO.06	Reporting, Case Management, and Response Procedure	Page 2/8

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





	Operational Procedure	
PO.06	Reporting, Case Management, and Response Procedure	Page 3/8

Textual Action Flowchart

1. Identification: Identification of a concern, suspicion, complaint, or incident—whether observed directly or reported by a child, adolescent, family member, team member, partner, vendor, or third party.
2. Immediate Protection: If there is a current or imminent risk, ensure the safety of the child or adolescent and, when safe, support their family, guardian, or trusted adult.
3. Immediate Reporting: Immediate notification to the Child and Adolescent Protection Focal Point or the alternative responsible person designated by the Foundation. If the Focal Point is implicated, the report must be made directly to headquarters or the corresponding higher authority.
4. Initial Record: Completion of the initial record with the minimum necessary information, avoiding value judgments, unnecessary questioning, or any action that could lead to revictimization.
5. Initial Assessment: Initial assessment of the risk, the urgency of the response, and the needs for protection, support, or referral.
6. Reporting to Headquarters: Communication with headquarters where applicable, especially if the case involves an individual subject to this Policy, a partner, vendor, collaborator, high risk, potential crime, or institutional impact
7. Specialized Support & Referral: Activation of specialized support or referral to protection services, health services, psychosocial support, legal assistance, or competent authorities, in accordance with the best interests of the child or adolescent and applicable regulations.
8. Investigation Decision: Decision regarding an internal investigation, external referral, or both, when the facts may constitute a breach of this Policy, the Code of Conduct, or legal obligations.
9. Inter-Departmental Coordination: Coordination with Directorate, Human Resources, partners, vendors, or authorities to implement precautionary, disciplinary, contractual, or corrective measures as appropriate.
10. Case Closure & Follow-Up: Documented closure of the case, formulation of recommendations, post-incident follow-up, and review of lessons learned to strengthen institutional prevention and response.

Obligation to Report Concerns

Every person subject to this Policy has the obligation 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 reporting individual to determine whether the facts are proven; the existence of a reasonable concern is sufficient to activate the corresponding procedure.

The deliberate omission to report a child or adolescent protection concern may constitute a breach of this Policy and lead to the corresponding internal, contractual, or disciplinary measures.

Reporting and Communication Channels

Fundación Xcalibur shall establish safe, accessible, and confidential channels for reporting concerns or complaints. These channels must be communicated to and known by staff,



	Operational Procedure	
PO.06	Reporting, Case Management, and Response Procedure	Page 4/8

volunteers, collaborators, partner organizations, vendors, participating children and adolescents, families, and communities.

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

- Direct communication to the Headquarters Protection Coordinator;
- Direct communication to the Field Protection Focal Point or Coordinator;
- Communication to the project management or relevant coordination team;
- Email or institutional channel designated for complaints;
- Community or in-person mechanisms adapted to the local context;
- Any other secure channel that allows for the activation of a protection response.

When a communication is received by a person who is not directly responsible for child and adolescent protection, they must forward it immediately to the Headquarters Protection Coordinator or the designated protection focal point, strictly adhering to confidentiality guidelines.

Indicative Minimum Timeframes

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

Receipt and Incident Report

Every communication received shall be recorded in a secure, confidential manner, limited strictly to necessary information. The record shall be coordinated by the Headquarters Protection Coordinator or the person designated for this purpose. In the field, the protection focal point may support the initial collection of information, always adhering to confidentiality, need-to-know criteria, and the protection of the child or adolescent.

The report shall include, to the extent possible:

- Date, time, and location of the report.
- Name, role, and contact details of the person reporting, except in cases of anonymous reports.



	Operational Procedure	
PO.06	Reporting, Case Management, and Response Procedure	Page 5/8

- Minimum details of the affected individual: name (if known), approximate age, sex/gender (when relevant), location, and immediate needs.
- Objective description of observed or reported facts, avoiding opinions or unverified conclusions.
- Literal words of the victim or complainant when relevant.
- Identification or description of the alleged perpetrator, if known.
- Immediate measures adopted to protect the child or adolescent.
- Persons informed and 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. Documentation shall be preserved in a secure archive, with access strictly restricted to authorized personnel who must intervene in the management of the case.

Initial Case Assessment

Upon receipt of the communication, the Headquarters Protection Coordinator, with the support of the field focal point where applicable, shall conduct 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 connection of the facts to activities, staff, collaborators, or entities linked to the Foundation;
- The need to adopt urgent protection measures;
- The advisability of referring the case to specialized services or competent authorities;
- The type of internal response that needs to be activated.

The initial assessment must be conducted with due diligence and shall always prioritize the safety, well-being, and best interests of the child or adolescent. In case of doubt, the principle of protection shall prevail.

Immediate Protection Measures

When a current or potential risk to a child or adolescent exists, Fundación Xcalibur shall adopt immediate protection measures. These measures shall be coordinated by the Foundation's Directorate and/or the Headquarters Protection Coordinator, with the support of the field focal point when the case occurs within a specific country, project, or activity.

Depending on the nature of the case, these measures may include:

- Ensuring that the child or adolescent is in a safe environment;
- Precautionarily separating the alleged person involved from any contact with children or adolescents;
- Temporarily suspending duties, activities, or access rights while the case is being assessed;
- Activating psychosocial, medical, legal, or specialized protection support.



	Operational Procedure	
PO.06	Reporting, Case Management, and Response Procedure	Page 6/8

- Inform parents, guardians, or legal representatives when appropriate and when doing so does not increase risk;
- Contact competent authorities when a legal obligation or serious risk exists;
- Adopt additional measures regarding confidentiality and protection against retaliation.

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

Referral to Specialized Services or Competent Authorities

When the nature or severity of the facts requires it, Fundación Xcalibur shall refer the case to specialized services or competent authorities, in accordance with applicable legislation in the country of intervention and existing local protocols.

Referrals must prioritize the safety of the child or adolescent, confidentiality, consent where applicable, and coordination with actors trained to provide specialized support. In cases of potential crime, severe violence, exploitation, sexual abuse, trafficking, disappearance, life-threatening risk, or other situations of special gravity, the Foundation must act in compliance with applicable legal and protection obligations.

The field protection focal point may support the identification of available local services and the practical coordination of the referral, always under the supervision of the Headquarters Protection Coordinator and within the boundaries of confidentiality and safety.

Internal Investigation or Institutional Analysis

When the reported facts involve staff, volunteers, consultants, vendors, partner organizations, or any individual linked to Fundación Xcalibur, the Foundation may launch an internal investigation or institutional analysis to determine whether this Policy, the Code of Conduct, or other applicable obligations have been breached.

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

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

Child and Adolescent-Centered Approach

Throughout the entire procedure, Fundación Xcalibur shall apply a child and adolescent-centered approach. This entails prioritizing their safety, dignity, well-being, privacy, right to be heard, and right to receive information appropriate 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 shall take place only when necessary, in a safe, respectful, and adapted manner, avoiding repeated or unnecessary interviews.



	Operational Procedure	
PO.06	Reporting, Case Management, and Response Procedure	Page 7/8

Confidentiality and Information Protection

All information related to a report, suspicion, or incident involving child and adolescent protection shall be treated with strict confidentiality. Information may only be shared with individuals who need to know in order to guarantee proper protection, assessment, referral, investigation, or response.

Confidentiality shall not prevent communication to competent authorities, specialized services, or mandatory reporting entities when a legal obligation, serious risk, or protection requirement exists. 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 individual, or cooperates with the implementation of this Policy.

Any act of intimidation, threat, retaliation, adverse treatment, or pressure related to a child and adolescent protection report or disclosure will be considered a serious breach and may give rise to disciplinary, contractual, or institutional measures.

Case Closure and Final Measures

The closure of a case must be documented in a secure and confidential manner. Documentation shall include the assessment conducted, protection measures adopted, referrals made, conclusions of the internal analysis or investigation, decisions taken, and any follow-up recommendations.

When a breach of this Policy is confirmed, Fundación Xcalibur shall implement measures proportional to the severity of the facts and the relationship of the individual involved with the Foundation. These measures may include formal warnings, mandatory training, duty reassignments, suspension, termination of employment or contractual relationships, exclusion from activities, termination of agreements with partner organizations, notification to competent authorities, or any other actions necessary to prevent future risks.

Follow-Up and Learning

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

Lessons learned from case management shall be used to review procedures, strengthen training, adjust risk assessments, and enhance the Foundation's overall child and adolescent protection mechanisms.



	Operational Procedure	
PO.06	Reporting, Case Management, and Response Procedure	Page 8/8

Annex 2: Minimum Incident Reporting Form

- Date, time, and location of the report.
- Name, role, and contact details of the person reporting, except in cases of anonymous reports.
- Minimum details of the affected individual: name (if known), approximate age, sex/gender (when relevant), location, and immediate needs.
- Objective description of observed or reported facts, avoiding opinions or unverified conclusions.
- Literal words of the victim or complainant when relevant.
- Identification or description of the alleged perpetrator, if known.
- Immediate measures adopted to protect.
- Persons informed and time of notification.
- Current risks and referral needs.
- Signature or validation of the Focal Point.

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

- Is the child or adolescent safe? If not, prioritize their immediate safety.
- Be available to listen, recognizing that the victim may not disclose when the adult expects them to.
- Listen carefully and attentively without interrupting.
- Ask only minimal clarifying questions; do not conduct an investigation.
- Take any disclosure seriously, even if there are no visible injuries.
- Create a safe, private, and calm environment.
- Remain calm and avoid showing shock, disbelief, or horror.
- Tell them that they did the right thing by speaking up and that they did nothing wrong.
- Acknowledge how difficult it may have been to report.
- Explain the next steps honestly.
- Do not promise absolute confidentiality (explain that information must be shared to protect them).
- Do not delay in taking action.
- Do not prejudge, make assumptions, or place blame.
- Contact the Focal Point or alternative person in charge immediately.
- Prepare a written report as soon as possible.
- Provide information on available, child-friendly support services.