

■ **Child Protection Policy**

Fundación Diagrama

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Fundación Diagrama Intervención Psicosocial

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1. INTRODUCTION

Fundación Diagrama Intervención Psicosocial is a non-profit organisation that has been assisting people in vulnerable situations and at risk of social exclusion since 1991, always ensuring the defence and promotion of Human Rights.

Its main objective is to promote and develop centres, services, programmes and research aimed at the prevention, treatment and integration of people in difficult life situations and at risk of social exclusion, especially children, young people, families, women, and dependants.

Fundación Diagrama is committed to respecting and promoting child rights, since children are one of the main groups assisted by the organisation. For this reason, this Child Protection Policy aims to ensure that no case of violence arises against children that come into contact with the organisation in the course of its work.

The protection of assisted children is the responsibility of Fundación Diagrama, but also of every person involved in its work, whether staff, interns, volunteers, service providers and/or subcontracted workers.

This policy in essence constitutes a set of standards that establish the principles, rules of conduct and procedures to follow in order to prevent, respond to, and report any case, or suspected case, of violence.

2. OBJETIVES

The aims of the present policy are to protect children that have a direct and indirect relationship with the organisation from any form of violence, as well as to state Fundación Diagrama's clear commitment regarding the protection of children.

3. DEFINITIONS

Child

For the purposes of this document, and in accordance with the United Nations Convention on the Rights of the Child (1989), the term "child" shall be understood as any human being under eighteen years of age. Such denomination adheres to the change in the paradigm regarding childhood instigated by said Convention and reflected in the Spanish Organic Law 8/2021, of June 4th, on the comprehensive protection of children against violence (hereafter Organic Law 8/2021), which reaffirms children as holders of rights and responsibilities against the traditional vision based on their guardianship, and incorporates the use of inclusive language.

However, given that the national legislation of Spain refers to "minors" to denominate people who have not reached the legal age of majority or the "benefit of adulthood" through emancipation, this term will sometimes be used when this Policy quotes the national legislation.

Best interests of the child

"Best interests of the child" shall be understood as the right and guiding principle by which the interests of children must be prioritised, both in processes adopting measures or decisions which affect them and in the application of their rights. It ought to be interpreted in accordance with the Convention on the Rights of the Child (1989) and the General Comment No. 14 (2013) of its Committee. .

Proper treatment

"Proper treatment" shall be understood, in the terms of Organic Law 8/2021 (article 1.3), as any action which respects the fundamental rights of children and actively promotes the principles of mutual respect, human dignity, democratic coexistence, peaceful resolution of conflicts, right to equal protection under the law, equality of opportunity and prohibition of discrimination with respect to children.

Protection

In the terms outlined in this document, the term "protection measures" must be understood as those comprehensive administrative, social and educational actions aimed at avoiding the risk or realisation of harm to children.

Actions aimed at the protection of children ought to be adopted and interpreted in accordance with article 19 of the Convention on the Rights of the Child (1989) and the General Comment No. 14 (2013) of its Committee, guaranteeing the wellbeing and full development of children in the broadest sense.

Violence

Organic Law 8/2021 (article 1.2) defines violence as any action, neglect or negligent treatment which deprives children of their rights and wellbeing, which threatens or interferes with their proper physical, mental or social development, irrespective of its form and means of commission, including that which is realised through information and communication technologies, especially digital violence.

In addition, the following are also defined as violence: physical, psychological or emotional abuse, physical, humiliating or degrading punishments, negligent treatment or neglect, threats, libel and slander, exploitation, including sexual violence, corruption, child pornography, prostitution, bullying, sexual harassment, cyberbullying, gender-based violence, genital mutilation, human trafficking, forced marriage, child marriage, unsolicited access to pornography, sexual extortion, the public sharing of private information, as well as the presence of violent conduct in the family environment.

Abuse

For the purposes of this document, every act or neglect which causes damage or a risk to the health, the wellbeing, natural development or dignity of the child physically, psychologically or emotionally, shall be considered as abuse.

Therefore, any form of physical or mental harm or abuse, neglect, negligent treatment or exploitation (commercial or of any other kind), including sexual abuse, which the child suffers under the custody of adults responsible for them or in the context of a

relationship of responsibility, trust or power, shall be understood as such.

Neglect

Those actions or omissions that put in danger at any scope the physical or psychological integrity of the child due to a failure to meet their basic physical or psychological needs, and which implies neglect of responsibilities, temporarily or permanently, by lack of care, effort or diligence for those responsibilities.

In addition, actions or inactions specifically related to obligations in education shall also be considered as neglect, when those obligations or the special educational needs of the child are ignored, as well as actions or inactions linked to medical attention, when the necessary or recommended treatment is refused or delayed.

4. GENERAL PRINCIPLES

The present Child Protection Policy is based on the Convention on the Rights of the Child adopted by the United Nations General Assembly in 1989, as well as the General Comments adopted by the Committee on the Rights of the Child. In addition, all the relevant international, European and national legal texts linked to the protection of children against any form of violence or abuse have been considered.

Thus, the general principles adopted in the present Child Protection Policy are:

- The best interests of the child will be at the core of any activity carried out, as well as the upholding of their rights which protect them against any possible harm.
- The wellbeing of children must be protected and promoted.
- Equality and non-discrimination. Children will be protected regardless of their race, sex, sexual identity, gender, language, religion, political or other kind of views, national, ethnic or social origins, economic status, disabilities, birthplace or any other condition of the child, or of their parents or legal guardians.

- The organisation will guarantee children's right to express their views freely on all matters affecting them and will take their views and opinions into consideration according to their age, maturity and capacity to form their own judgment, as well as ensure their active participation in all matters affecting them.
- The right to protection against any form of violence, abuse or neglect. It is the responsibility of any adult involved in the organisation to ensure that the children that participate in any activity organised by Fundación Diagrama do so in a safe environment and that the organisation protects them against any form of harm or damage.
- As an organisation dedicated to the care or the protection of children, Fundación Diagrama will comply with the rules and standards established by the relevant authorities, especially in matters of security, sanitation, number of employees and their competence, as well as with regard to the existence of suitable supervision.
- The organisation has the duty and responsibility to support the protection of those children that it works with, those who are in contact with the organisation, or those who are affected by the work carried out by the organisation even when it is not directly addressed to them.
- Fundación Diagrama's Board of Trustees, workforce, as well as interns and volunteers, are responsible for ensuring the protection of children.
- The organisation commits to promoting and supporting its partners in their responsibility to comply with the requirements of child protection.

5. SCOPE

This policy is to be applied to every person that participates in the work of Fundación Diagrama, whether the Board of Trustees, workforce, interns or volunteers, service providers, subcontracted workers and any other natural or legal person who maintains any sort of relationship with Fundación Diagrama.

6. APPLICATION

6.1. Risk evaluation and mitigation

Fundación Diagrama has a documented procedure for risk management, integrated in its Quality Management System (QMS), regarding the identification, evaluation and analysis of the associated risks for each one of the processes carried out in the organisation which involve or affect children, either directly or indirectly.

The process for risk management is carried out by a multidisciplinary team and contains several phases which begin with a context analysis and SWOT analysis. Then risks are identified from the threats and weaknesses detected. The risk assessment is carried out using the Mosler method, which allows for the calculation of the class and scale of the risk, producing a risk map as a result.

According to the results of the assessment, risks are prioritised and a plan of action is established for their mitigation. These plans of action are regularly monitored.

The whole process of risk management is reviewed annually or whenever there is a considerable change in the processes, regulations or activities which can affect children.

6.2. Code of Conduct

The Code of Conduct, included in Annex I, is an element of the Child Protection Policy which constitutes a public declaration of the behaviours and attitudes in relation to the protection of children against violence that both Fundación Diagrama and the workforce linked to it must observe in their work.

Its understanding and application is mandatory for the entire workforce, interns or volunteers, of Fundación Diagrama. Therefore, it must be accepted and signed in advance of joining the organisation (see Annex II. Code of Conduct Ratification Document).

6.3. Safe recruitment

Fundación Diagrama commits to the creation of environments of child protection, and therefore all aspects related to this protection will be taken into consideration in the selection and recruitment of employees in order to avoid the recruitment of any person who does not comply with the necessary conditions to work with children.

In this respect, the selection and recruitment of the workforce, interns or volunteers, will be carried out in accordance with the following procedure:

- The organisation will, from the beginning, state to the candidate its commitment to protecting children.
- At the beginning of the working relationship, internship or volunteering, each person will be provided with a copy of Fundación Diagrama's Child Protection Policy and Code of Conduct, and both documents must be ratified by the person.
- Also, in addition the candidate's training, experience and professional competency, the following aspects shall be viewed as particularly positive:
 - That they have the personal qualities and essential values required for working with children.
 - That they have received training in the field of child protection.
 - That they possess previous professional experience related to child protection.

In addition, in compliance with articles 57 and following of Organic Law 8/2021 of June 4th regarding the comprehensive protection of children against violence, it will be an essential requirement for all those individuals who have or are going to have regular contact with children:

- That, in order to start working or volunteering in the organisation, the candidate provides certification from the National Sex Offender Registry

which states that they have not been sentenced for any crime against sexual liberty and indemnity typified under heading VIII of Organic Law 10/1995, of November 23rd, of the Penal Code, as well as any crime of human trafficking typified under heading VII of the same law.

- Once the working relationship or volunteering in the organisation has begun, the employee or volunteer ought to communicate to the organisation any change of their status on said Registry as regards to the existence of a criminal record, even when it stems from events which preceded the start of the relationship. The omission of this communication is grounds for the termination of said relationship.

Finally, collaborators or subcontracted workforce that have direct contact with children assisted by Fundación Diagrama, shall also have to present certification from the National Sex Offender Registry, or an equivalent document of their country of origin, if they are not Spanish (a criminal record certificate).

6.4. Awareness-Raising and Training

6.4.1. Aimed at the workforce

Fundación Diagrama views as fundamental that its entire workforce know about how to best protect children within their professional duties, as well as have appropriate and up-to-date knowledge on what is considered violence against children, their obligation to prevent it and what to do if violence occurs.

Therefore, the organisation places great value in training for the provision of knowledge, skills and updates regarding child protection, requiring that those people who start work with Fundación Diagrama and that directly work with children receive training on child protection. This training shall be integrated as part of the initial training, which the whole workforce receives before beginning work.

In the same way, Fundación Diagrama's Joint Commission shall plan means of continuous training with modules on child protection. Said training will include content on child rights and intervention work that

respects children's dignity, as well as on the prevention, detection and reporting of situations of abuse.

6.4.2. Aimed at Children

Children with a connection to the organisation's work will be able to participate in training and awareness activities in order to promote their complete exercising of their rights and their protection against all forms of violence.

These actions will be carried out considering a gender perspective, as well as the specific needs of people with disabilities, with different racial, ethnic or national origins, in economic difficulty, without family support, and belonging to the LGBTI community or with any other sexual orientation and/or gender identification. The language and means employed will be adapted to the age and nature of the children, in order to be accessible for them, differentiating by age range.

In accordance with article 18 of Organic Law 8/2021, Fundación Diagrama has adopted the following measures:

- Upon the child's arrival at the residential facility or the programme/service, all the information referring to the Child Protection Policy and the procedures of reporting for cases of violence shall be provided to them, both those established internally and those externally regulated by public administrations (telephone lines, digital means, etc.). This information shall be provided in accessible and adapted language.
- The information relevant to the Child Protection Policy shall be regularly updated, and available in a visible and accessible location so that children can consult it freely at any time.
- The necessary support shall be provided so that children can identify cases of violence and are familiar with the procedures to report them, as well as the individuals in charge to whom the information must be communicated. In addition, informative sessions shall be carried out on a yearly basis.

- Child participation shall be encouraged, with the implementation of participation programmes, and the involvement of children in awareness-raising actions.
- Special activities shall be carried out on the anniversary of the adoption of the Convention of the Rights of the Child.

Training activities are rooted in an inclusive notion of education and a rights-based approach. They are aimed at the training of children to increase their protection when faced with varying manifestations of violence. Therefore, in accordance with Organic Law 8/2021, Fundación Diagrama shall carry out programmes on the following topics:

- A programme for the promotion of children's rights.
- A programme for the promotion of safe and responsible use of information technologies.
- A programme for the promotion of equality in relationships.
- Any other programme which contributes to the eradication of violence against children.

6.5. Roles and responsibilities

6.5.1. Fundación Diagrama's Child Protection Committee

Fundación Diagrama's Child Protection Committee is a collegiate body dependent on the Board of Directors with sufficient autonomy to manage the Child Protection Policy and its related documentation, as well as to carry out actions for its implementation, evaluation and improvement. It is comprised of:

- The Child Protection Policy Coordinator.
- A representative of the Board of Directors.
- A representative of the Legal Department.

The people who make up the Committee are named by the Board of Trustees of Fundación Diagrama. Notwithstanding the above, any other person could be asked to be involved in the activities carried out by the Committee when it is deemed necessary for suitably complying with the responsibilities with which the Committee is tasked.

The Committee's responsibilities are:

- To promote, supervise and guarantee the compliance with, and application of, the Child Protection Policy in all of Fundación Diagrama.
- To guarantee children's rights, promoting a humane and trustworthy intervention environment.
- To establish and implement the necessary procedures for the appropriate development of, and compliance with, the Child Protection Policy.
- To develop systems and tools which facilitate the reporting of possible cases of violence, or a violation of the Policy.
- To investigate any possible case of violence or a violation of the Child Protection Policy and to adopt all measures necessary in each case in order to avoid the situation or violation immediately, in accordance with the Action Protocol established.
- To advise on the decision-making process in intervention situations where conflicts arise in this regard.
- To disseminate and raise awareness of the Child Protection Policy among the workforce, promoting the carrying out of informative actions adapted to the responsibilities of each role.
- To ensure that new employees receive initial and continual training, as part of the training and awareness-raising activities planned.
- To establish and implement the procedures for the dissemination of, and familiarisation with, the Child Protection Policy among children assisted.
- To inform the Board of Directors regularly of the work carried out in connection with the application of the Child Protection Policy.

6.5.2. Child Protection Policy Coordinator

The person who holds the position of Child Protection Policy Coordinator shall be designated by the Board of Trustees of Fundación Diagrama. This person's primary responsibility is the prevention, detection and management of the possible risks of violence which children assisted by Fundación Diagrama could encounter.

This person's responsibilities are:

- To advise the Board of Directors on everything in connection with the Child Protection Policy.
- To identify and manage the risks of violence against children which might arise from Fundación Diagrama's work.
- To participate in the development of the necessary tools and methodologies to assess risks, draft a risk map and propose mitigatory measures.
- To oversee the implementation of mitigatory measures.
- To facilitate the understanding of the obligations stemming from the Child Protection Policy to all those under its scope.
- To keep the workforce informed of new developments to child protection in national, European and international policies.
- To promote the undertaking of related training adapted to each professional role.
- To organise activities to raise awareness among the organisation's workforce on the importance of their role in complying with the Child Protection Policy.
- To disseminate information through existing channels for both internal and external communication of queries, suspicions or evidence of cases of violence to children.
- To manage the reports of suspicion or evidence of violence, or of violation of the Policy, received through the reporting channels established in accordance with the Action Protocol developed.

- To respond to queries received, following the indications of the Action Protocol.

6.6. Action Protocol in possible cases of violence

Fundación Diagrama has an Action Protocol for possible cases of violence (Annex IV) in order to comply with the reporting duties demanded of those people who have been commissioned to the assistance, care, teaching or protection of children (article 16, Organic Law 8/2021), but also in order to guarantee safe, confidential, effective, adapted and accessible reporting channels for children (article 17, Organic Law 8/2021).

This protocol specifies the different physical and electronic reporting channels available for the reporting of any suspicion or evidence of violence in which children may be involved, provoked by any person, as well as any inadequate treatment or any violation of the Code of Conduct and the Child Protection Policy.

The Action Protocol outlines the actions to undertake in five possible scenarios:

For each one of the scenarios, except in that of a Query (scenario 1), the following steps are to be taken:

RECEIPT OF REPORT

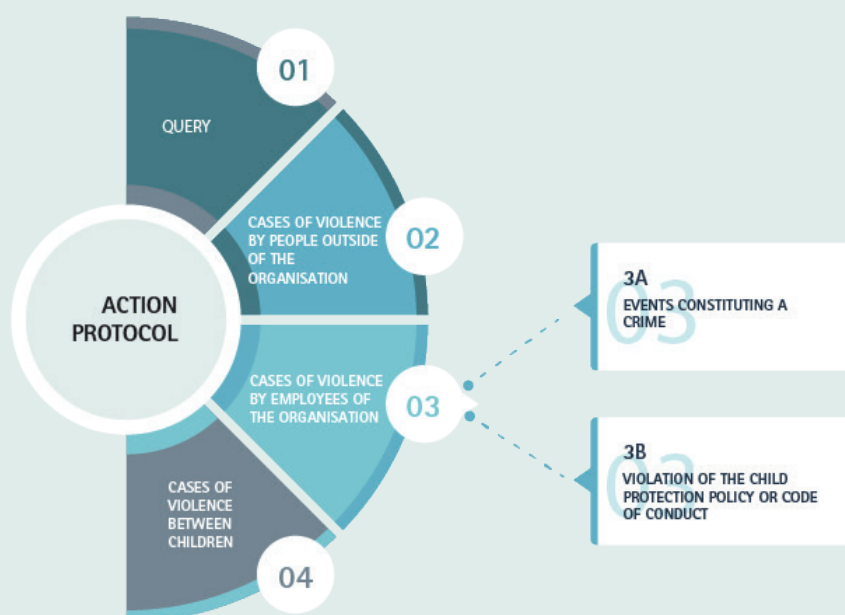
ASSESSMENT OF THE LEVEL OF SERIOUSNESS FOR EVENTS CONSTITUTING A CRIME: TRANSFER TO THE PUBLIC PROSECUTION SERVICE

INTERNAL INVESTIGATION – CONSIDERATION OF SAFEGUARDING MEASURES TO ADOPT

RESOLUTION--COMMUNICATION OF MEASURES TO ADOPT

RECORD OF ACTIONS

CLOSURE OF CASE



The protocol must be known both by the organisation's employees as well as by the children and their families. Child-friendly versions will be developed for children, explaining to them its purpose and how they can make use of it.

6.7. Protection of children's data

Fundación Diagrama Intervención Psicosocial has a System for Data Protection implemented in accordance with that outlined in the EU Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR), and in Organic Law 3/2018, of December 5, on the Protection of Personal Data and Guarantee of Digital Rights, (LOPDGDD). In accordance with this, the personal data of people assisted by the organisation and, more specifically, of the children assisted, shall be processed (such as in its collection, access, storage, transfer or communication, modification and deletion, etc.) in accordance with the enforceable legal requirements and with the inclusion of data protection in all of the projects and processes of the organisation by design and by default.

Fundación Diagrama has established the position of Data Protection Officer, with independence and autonomy within the organisational chart of the organisation, who can be contacted for any query or advice request using the email address dpd@diagrama.org. In addition, in compliance with articles 30, 34 and 35 of the GDPR, Fundación Diagrama is committed to the regular updating of the record of activities concerning the processing of personal data, and is involved in the processes of risk analysis and impact evaluation, in this case regarding sensitive processing, using the relevant monitoring measures in order to minimise and/or avoid possible risks.

In addition, in compliance with current legislation regarding the protection of personal data and following Fundación Diagrama's Quality Policy, the personal data of those people assisted by the different resources, centres and programmes of the organisation, both data contained in personal files as well as data collected by staff, and which are authorised

to be processed, will be processed in consideration of the following general principles:

- Fundación Diagrama and all of its employees will process the personal data of the children using the technical and organisational measures necessary to guarantee the adequate levels of security for the nature of such data. The measures will be periodically reviewed, to protect children's personal data and privacy and to avoid unauthorised access, altering, loss or processing of such information.
- Fundación Diagrama and its employees guarantee that the personal data and all the information that be provided will be used exclusively for the purpose(s) properly communicated and documented, and that it shall be processed with absolute confidentiality, all of them being obliged, together with whomever is involved in any stage of the processing of this sort of data, to uphold the mandatory duty of secrecy with respect to the information, in accordance with the respective ethical codes of their profession, and with the relevant legislation and standards. The information or personal data is not to be used for personal ends or with the aim of making public or communicating the information to third parties. This duty shall remain even after their relationship with Fundación Diagrama has ended.
- To this end, the necessary training on the protection of personal data shall be guaranteed to people authorised to interact with this sort of data.
- The data and information of children contained in the files and archives –automated and non-automated– of Fundación Diagrama and incorporated for their processing shall not be accessed by anybody outside the organisation, except for the relevant public administration (in cases in which it has the role of data controller and, therefore, Fundación Diagrama has the role of data processor which reports to the data controller).
- No decision of Fundación Diagrama shall be based solely on an automated processing of data or information which provides a profile or personality description of the children assisted.

- Fundación Diagrama shall be able to use (with prior approval, if necessary, of the relevant public administration) the data with regards to children, to generate knowledge and/or research which can help improve the treatment and intervention programmes and their content, on a national as well as regional scale. In this respect, the right to privacy shall be protected and guaranteed, and processing of data shall be carried out following laws 39/2015, on the Common Administrative Procedure, and 40/2015, on the Legal Regime of the Public Sector.
- All the data and information that refers to assisted children and appears in their "personal individual files" shall be considered as restricted, with only the staff that carried out the intervention with these children having access to the information (and the staff of the relevant public administration, if applicable). The children themselves, their legal representatives and their respective lawyers shall also have access to the information, if they request it in express form, in accordance with the established procedure of access.
- The data shall be stored for the time necessary to achieve the purpose for which it was collected or whilst the relationship of the children with the organisation is maintained. After that, the data shall remain blocked for addressing possible legal, administrative or financial responsibilities or claims, for the period allowed by the applicable legislation. When this period ends, the information shall be deleted or anonymised.

With the aim that assisted children are familiar with the rights and specifications pertaining to the protection of their personal data, at the time of the collection of their data and its incorporation into files of the centre, service or programme, the child shall be provided with all of the information relating to the conditions of the processing of their personal data and, more specifically, the document of 'Information and express consent for the processing of personal data and images' shall be delivered to them (which shall be previously agreed with the relevant public administration in cases where it is necessary) for them to read and sign. The staff ought to ensure that children duly understand the information in the document and that their authorisation is granted fre-

ely, specifically, unequivocally and after having been properly informed.

In this regard, and in accordance with the provisions of the LOPDGDD, children 14 and older are allowed to give consent to the processing of their personal data, while in cases of children under 14 years of age consent must be given by a holder of parental responsibility or legal guardianship.

6.8. Use of images of children in external and internal communication actions

As an organisation that works in different fields of child assistance, one of the main duties of our communications policy is to protect the image, identity and personal dignity of all children with whom we work.

In strict compliance with the provisions of Organic Law 1/1982, of May 5th, on civil protection of the right to honour, personal and family privacy and one's own image; Organic Law 3/2018, of December 5th, on the Protection of Personal Data and guarantee of digital rights; Regulation (EU) 2016/679 of the European Parliament and of the Council, of April 27, 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data; as well as by Organic Law 7/2021, of May 26, on the protection of personal data processed for the purposes of prevention, detection, investigation and prosecution of criminal offences and the execution of criminal sanctions (in those areas affected by it), Fundación Diagrama's policy in this regard is to maintain the anonymity of all children assisted, as well as of formerly assisted young people who, in spite of being adults by age, are under the protection of social services for children (Child Protection System, Youth Justice System).

In this regard, the following measures shall be taken to guarantee said anonymity in external or internal communications:

- All images or information about a minor require the express necessary authorisation of their parents or legal guardians for the specific purposes

for which the images or information are going to be used, as well as that of the relevant public administration responsible for the service in which the child is assisted. With regards to people of adult age who are in the Youth Justice or Child Protection systems, their express authorisation and that of the relevant public administration is required; and, where possible, parents or legal guardians must be informed.

- The name and surname of children or their relatives is never to be used publicly, using instead wording which does not allow them to be identified. In cases where it is not possible to anonymize the identity, alternative wording is to be used, such as initials or a pseudonym. This protection is extended to people of adult age that were assisted by Fundación Diagrama when they were minors. In this case, the choice of wording used can be broadened, if the former person assisted approves, showing at the most the first name without the surname. In addition, the face of the individual can be shown if the individual unequivocally approves, being sufficiently informed, that it be used in the way proposed.
- The faces of children assisted by Fundación Diagrama are never to be shown, neither for internal nor external communications. This can also be extended to any identifying feature that they may have. Any images taken must be framed in a way that hides their identity; where this is not possible due to the use for which they are intended or due to the nature of the activity portrayed, all those features which could allow for the identification of the person are to be blurred with the proper image-editing software.
- Children shall never be depicted in ways, situations of contexts that could be detrimental to their own dignity, or that of groups which they may represent, depending on the context of the image in which they appear. In particular, the following must not be portrayed: any negative stereotypes of gender, race, disability or sexual orientation; association with urban gangs; images which might suggest incorrect behaviour by the minors or the people that accompany them; or images which trivialise social or personal issues.
- All texts and images of children used are to be in line with the aims, values and objectives of Fundación Diagrama, and therefore always have the purpose of promoting the social integration of the people involved, to contribute to their individual and group development, to normalise their public image in society and to make the population generally aware of the goals and objectives which they achieve in their socio-educational process.
- The personal data of children is not to be shared with any person or entity that does not possess the proper authorisation to receive it, and always following Organic Law 3/2018 with regards to the responsibility held by the person or entity authorised for the possession of this information, and for the use and treatment of such data. This includes the express prohibition of revealing to any unauthorised person if a specific minor is or is not assisted by a centre or programme managed by Fundación Diagrama, as well as the reasons for which the child is being assisted, even in cases in which an unauthorised person or entity already had such information by whatever means beforehand.
- No person is permitted to take pictures or statements from children assisted by Fundación Diagrama, nor to take pictures within the centres and programmes of the organisation, if they do not have the express authorisation to do so. This includes both people external to the organisation (who ought to have the authorisation of the parents or legal guardians of the minor, and of the relevant administration) and workers employed by Fundación Diagrama or its affiliated entities (which ought to have the authorisation of the parents or legal guardians, and of the management of their respective centre or programme).
- All images taken by the employees of Fundación Diagrama or its affiliated entities as part of their work belong to Fundación Diagrama. They are not to be for personal use in any case, except with the express authorisation of Fundación Diagrama's Communications Department, and as long as they respect all the other conditions reflected in this policy.

These measures ought to be respected at all times by those who work in Fundación Diagrama or collaborate with it, except in two scenarios where the responsibility does not belong to the organisation:

- If the parents or legal guardians of minors make a justified and informed request that one of these measures be annulled, within the limits that the legislation allows. In this case, Fundación Diagrama ought not to play an active part, in any way, in this non-compliance with its Child Protection Policy, devolving all responsibility to parents or legal guardians. In addition, every unilateral action taken by parents or legal guardians in this context, without consulting Fundación Diagrama beforehand, is the exclusive responsibility of those people.
- If the relevant public administration communicates, with the appropriate justification and documentation, that one of these measures ought to be annulled, within the limits that the legislation allows. In this case, Fundación Diagrama can only be an active part in a measure that has been expressly stipulated in the contracts signed for the carrying out of work with said administration, and as long as this action does not violate the principles and values of the Child Protection Policy.

7. APPROVAL, EVALUATION AND REVISION OF THE POLICY

The Child Protection Policy is a document included in Fundación Diagrama's Quality Management System and complies with that established in the Documented Information Control Procedure regarding its revision, approval and dissemination.

The Policy is approved by Fundación Diagrama's Board of Trustees in an ordinary meeting at the start of the year and it is distributed to the whole workforce through the employee portal; it forms part of the documents contained in the Welcome Plan for new employees and is available to any other interested party on the website www.fundaciondiagrama.es.

In order to measure the level of compliance with the principles of the policy, the procedures and the protocols established within it, as well as the actions related to risk mitigation, quantitative and qualitative evaluation shall be carried out, using the following techniques:

- Internal audits: Through these, professionals responsible for the audit will verify, using the Internal Audit Questionnaire, the compliance with and record of the activities specified in the Child Protection Policy, as well as the extent of their compliance with the Child Protection Standards. For this, the following actions can be carried out:
 - Interviews with the employees and other people.
 - Monitoring of the organisation's activities and the work environment.
 - Revision of documents, records, data analysis...

The result of the audit shall be reflected in the Audit Report in the form of non-conformities (or non-compliances), observation (possible non-compliance), areas for improvement (auditor's suggestions...) and areas of strength.

After the audit, the Child Protection Committee shall establish the necessary actions for the resolution of the non-conformities and the observations.

- Carrying-out of the procedures: All of the procedures established in the Child Protection Policy shall be accompanied by, at the least, one indicator that determines their achievement. A regular monitoring of these indicators shall be carried out and necessary actions shall be taken when their value is not at the required level.

Revision of the Policy shall be carried out annually and consists of confirming that the content of the Policy is adjusted to the changes and modifications that may have taken place in the rules and regulations of application, the risk procedures and evaluation. Subsequently, the policy shall be updated where necessary.



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