

POLICY ON THE PROTECTION AND GOOD TREATMENT OF CHILDREN, ADOLESCENTS AND VULNERABLE INDIVIDUALS

Grupo ABD, hereinafter referred to as ABD, is a non-governmental, non-profit organization that has been advocating for vulnerable individuals for over 40 years. Our mission is to support people through the different stages of their life journeys, both individually and collectively, with strong roots within the community and a commitment to community engagement.

We dedicate all our resources and capabilities to promoting personal autonomy, well-being, and social cohesion. To achieve this, we implement an intervention model based on ethical principles of close collaboration and unequivocal quality standards, guaranteeing a safe and respectful environment for all our users, especially those in particularly vulnerable situations.

At ABD, we believe in a just society that eradicates inequality and social exclusion, where all families, children, and adolescents have equal opportunities, where women and men live in true equality, and where the elderly, dependents, and people with disabilities live with dignity. We believe in a future where young people and adults alike use drugs consciously and responsibly, where there are no evictions and the right to housing is respected, as well as the right to asylum; we want to welcome migrants and refugees so that everyone can live with equal opportunities, regardless of their cultural background.

Grupo ABD develops a comprehensive intervention through various specialized areas to respond to the needs of children and adolescents and people in situations of vulnerability and social fragility.

Policy Fact Sheet for Protection and Good Treatment

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Goals:	• Systematically analyze all work elements to identify and correct potential risks that affect the safety of children and adolescents. • Have preventive action protocols in place to minimize any identified risk factors. • Ensure that all adults involved in our activities, whether professionals, volunteers, or collaborators, have specific training in the protection and rights of vulnerable groups. • Detail the procedures for immediate action in the event of any suspicion or confirmed situation of neglect or abuse. • Use appropriate indicators to assess compliance with protection objectives and ensure the constant evolution of our management system.

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Reach:	All ABD staff, volunteers, interns, representatives of partner organizations, and supplier companies
Documents related:	ABD Code of Ethics ABD Quality Policy
Communication:	www.abd.org

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Introduction

Vulnerability is an inherent human condition that can manifest itself with particular intensity in childhood and adolescence, but also in adulthood due to situations of dependency, disability, or social fragility. At Grupo ABD, we operate on the conviction that all people, regardless of age or condition, have the fundamental right to be protected from any form of harm and require care based on respect and dignity.

We firmly believe in everyone's right to a life free from violence and assume the institutional responsibility of creating the necessary conditions to guarantee the safety and well-being of children, adolescents, and vulnerable individuals under any circumstances. Therefore, we have developed this Policy for the Protection and Well-being of Children, Adolescents, and Vulnerable Individuals, which establishes mandatory guidelines for all individuals associated with our organization.

We are committed to holistic well-being, and with this intention, this policy comprises a set of strict guidelines for staff, volunteers, representatives, consultants, and visitors of the organization. Its purpose is to clearly define how to maintain safe environments, promote respectful treatment, and respond effectively to any concerns or risk situations.

The central objective of this Policy is to prevent and protect children and adolescents from abuse, mistreatment, neglect, and exploitation. We seek to promote their health, development, and well-being, consolidating an organizational culture based on awareness and proactive protection.

Through this document, Grupo ABD guarantees the implementation of all possible measures to mitigate risks and protect children, adolescents, and vulnerable people from all forms of violence. This Policy details the responsibilities of each employee and is intended to be a reference tool for any entity or company that works, directly or indirectly, for the well-being of the most vulnerable members of our society.

Finally, this Policy incorporates a commitment to continuous improvement in our protection management system and ensures compliance with all applicable regulatory requirements, including the most demanding quality and ethical standards.

1. Definitions

Below, we explain some of the key concepts we believe are necessary to understand both the scope and the context of this protection and respectful treatment policy. The definitions chosen are not arbitrary but a conscious and considered selection, as they clearly reflect the organization's position on various aspects:

Subjects of Protection

- Child and adolescent: Every human being from birth to 18 years of age, in accordance with the Convention on the Rights of the Child.
- Person in a Vulnerable Situation (PVS): Any person who, due to age (including older people), disability, health, dependency or social exclusion, is in a position of power imbalance and requires special protection to guarantee their integrity and rights.

Operational Protection Framework

- Comprehensive Protection (Safeguarding): A set of legislative, social and educational measures designed to protect children and adolescents from all forms of harm, physical or mental abuse, neglect, negligent treatment or exploitation.
- Child and adolescent protection: coordinated measures aimed at promoting the proper and full development of children and adolescents from a holistic perspective. Child protection, as we understand it, has a framework defined by the Declaration of the Rights of the Child and is based on the principle of the best interests of the child and adolescent.

Article 19 of the Convention on the Rights of the Child states:

1. States Parties shall take all appropriate legislative, administrative, social and educational measures to protect the child from all forms of physical or mental injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s) or any other person who has responsibility of the child.
2. These protective measures should include, as appropriate, effective procedures for the establishment of social programs to provide the necessary assistance to the child and

those who care for them, as well as for other forms of prevention and for the identification, notification, referral to an institution, investigation, treatment and further observation of the above-described cases of child abuse, and, where appropriate, judicial intervention.

- **Organizational child protection (safeguarding):** The decision and duty that organizations have to protect the rights and well-being of children entails the definition and articulated deployment of a comprehensive policy that establishes objectives and strategies and organizes the available resources in a coherent and appropriate manner in order to achieve them.
- **Good Treatment:** Active respect for the rights and needs of the person to guarantee their full well-being. It includes expressions of affection, care, and support that ensure holistic development (physical, sexual, intellectual, and social).
- **Care:** Essential activities for maintaining well-being on a physical, emotional, community, and socio-political level. All forms of care (cooking, helping with homework, cleaning a wound, listening to and addressing fears, organizing to eradicate injustices, etc.) are necessary to sustain what is most fundamental in our lives. Without care, life ceases.
- **Child welfare:** The realization of children's rights and the creation of opportunities for children and adolescents to be and do what they value in light of their capacities, potential and skills.

Principles of Intervention

- **Best Interests of the Child and Adolescent Principle:** Criterion that prioritizes the rights and needs of the vulnerable person in any decision or measure that affects him or her, guaranteeing his or her dignity and safety.
- **Active Participation:** Fundamental right to accessible information and to have the person's opinion taken into account in the processes that concern them, promoting their empowerment and the acquisition of self-protection tools.
- **Coeducation and Gender:** An educational paradigm that excludes sexist stereotypes so that each person can freely build their identity and personality.
- **Interculturality:** Implies several key principles: the construction of spaces for interaction, dialogue, shared knowledge, the intersection of realities, and the

promotion of good treatment and respect for different

Contact Categories

- Direct Contact: Physical presence, whether occasional or regular and whether short or long term, with children, adolescents, and vulnerable individuals during the provision of services.
- Indirect Contact: Access to sensitive information (names, images, locations or social media data) that generates the responsibility to safeguard privacy.

Actors and operating environments subject to policy compliance

- ABD Representatives (Obligated Entities): This includes all salaried staff, volunteers, interns, consultants, board members, and anyone acting on behalf of the organization. It also includes those who have direct contact with service users, visit ABD programs, or have access to their confidential information.
- Partner Organizations and Alliances: Independent entities (NGOs, community organizations, or businesses) with which ABD cooperates to achieve shared objectives under a consortium or collaboration model. These organizations must adhere to ABD's protection standards when acting as implementing partners.
- Direct Programs and Projects: Services and activities executed and managed entirely by ABD using its own staff and resources.
- Partnership Programs and Projects: Initiatives managed and implemented by partner organizations for which ABD provides funding, technical support, or a strategic partnership agreement

Definition and Forms of Violence

Violence is understood as any action, omission, or negligent treatment that deprives a person of their rights and well-being, regardless of the means by which it is committed (including the digital environment). Violence exists when there is an imbalance of power between the perpetrator and the victim. Violence is never justifiable and must be rejected and combated forcefully, even in its seemingly mildest forms.

Specifically, if we focus on childhood and adolescence, the LOPIVI defines violence as:

“For the purposes of this law, violence is understood to mean any action, omission, or negligent treatment that deprives minors of their rights and well-being, that threatens or interferes with their orderly physical, psychological, or social development, regardless of its form or means of commission, including that carried out through information and communication technologies, especially digital violence. In any case, violence shall be understood to include: physical, psychological, or emotional abuse; physical, humiliating, or degrading punishments; neglect or negligent treatment; threats, insults, and slander; exploitation, including sexual violence, corruption, child pornography, and prostitution; school bullying, sexual harassment, and cyberbullying; gender-based violence; genital mutilation; human trafficking for any purpose; forced marriage and child marriage; unsolicited access to pornography; sexual extortion; the public dissemination of private data; and the presence of any violent behavior within their family environment.

Violence against children has negative consequences on the present and future development and well-being of children and adolescents, but it also implies the denial of the dignity they have as human beings.

Recognized Types of Violence:

1. Neglect: Lack of attention to physical, psychological, or emotional needs.
2. Psychological Violence: Verbal abuse, humiliation, isolation, or threats that affect emotional well-being.
3. Physical Violence: Intentional or unintentional acts that cause bodily harm (hits, cuts, burns, beatings, etc.).
4. Sexual Violence and Exploitation: Subjection to sexual acts through deception, force, or manipulation. In children and adolescents, this has very serious consequences for their emotional, psychological, and psychosexual development and well-being, which can be long-lasting. It includes, among other things, kisses and caresses with sexual connotations, innuendo, masturbation, voyeurism, exhibitionism, grooming, showing pornography, engaging in prohibited sexual relations, sexual exploitation, and trafficking.
5. Digital (Online) Violence: Use of Information and Communication Technologies (ICTs) for harassment (cyberbullying), sexual grooming or extortion through images (sextortion).
6. Bullying: Repetitive behavior intended to hurt or frighten a peer, based on an imbalance of power.
7. Gender Violence: Harm suffered by women and their children due to violence against the mother or other family members or caregivers, aggression in adolescent couples

based on sexist roles and other harmful traditional practices that cause harm to girls and adolescents (such as female genital mutilation or early and forced marriages).

8. Institutional Violence: Violation of rights caused by actions, programs or procedures of public or private entities.

9. Torture and inhuman or degrading treatment. This refers to acts of violence intended to force a person to confess or to punish them extrajudicially for unlawful or criminal conduct.

2. Institutional declaration of commitment

In May 2022, the ABD Board of Directors reaffirmed its institutional commitment to the protection and well-being of children and adolescents (Annex I), considering it especially important to address the protection of children and adolescents at risk of violence as subjects of rights from a perspective of institutional responsibility and mandatory compliance for all personnel who interact with them. For ABD, ensuring a safe environment is a strategic challenge that we acknowledge and address in our daily practice.

Recognizing that conflicts and situations of violence may arise in professional practice, our commitment translates into:

- Universal Welfare Guarantee: We strive to ensure the well-being of all people, regardless of age or condition, who participate in any program, project or activity of the entity, paying special attention to children and adolescents.
- Safe Development Environments: We guarantee healthy, protected spaces for physical, emotional and psychological development based on good treatment.
- Culture of Good Treatment: We promote good treatment by each and every one of the collaborating individuals (professionals, volunteers and students in internships) as the essential axis of the relationship with the people served.

Our commitment is embodied in a Comprehensive Protection and Well-being Policy that governs all operational aspects of the organization. This policy is the fundamental tool for consolidating an institutional culture of safeguarding through the following strategic objectives:

- Systematically analyze all work elements to identify and correct possible risks that affect the safety of children, adolescents, and vulnerable adults.
- Have preventive action protocols in place to minimize any identified risk factors.
- Ensure that all adults involved in our activities, whether professionals, volunteers, or collaborators, have specific training in the protection and rights of vulnerable groups.
- Detail the procedures for immediate action in the event of any suspicion or confirmed situation of neglect or abuse.
- Use appropriate indicators to assess compliance with protection objectives and ensure the constant evolution of our management system.

Through this declaration, ABD formalizes its ethical and institutional commitment to the well-being of children and adolescents with whom we work, guaranteeing the full exercise of their fundamental rights in maximum security environments. Furthermore, this Policy and Comprehensive Safety Plan incorporates a commitment to continuous improvement within our protection management system and ensures compliance with all applicable regulatory requirements, including the most demanding quality and ethical standards.

3. Scope

ABD's Protection and Well-being Policy is structured to create a safe and protective community for children, adolescents, and vulnerable individuals. Therefore, it applies (scope) to various groups of people both within and outside of ABD. Specifically, this policy applies to:

Outreach Group	Scope Group Description	Protection Policy aspects that apply
INTERNAL ABD staff who have an employment relationship with ABD.	Professionals with an employment contract with ABD: these may be professionals providing direct care to children, adolescents, or people in vulnerable or indirect situations: structural professionals (HR, finance department, IT, communications, technical department).	Code of conduct. Sexual offenses certificate. Code of ethics. Welcome manual. Communication plan. Letter of commitment for workers and collaborators. Training and education.
EXTERNAL Personnel with non-employment ties.	Volunteers, interns, trainees.	Code of Conduct. Letter of commitment for workers and collaborators. Training and education.
EXTERNAL Staff from collaborating/partner organizations (partners). Partner organizations.	People who work in other entities or federations and who work or collaborate with ABD by offering their services externally; and who may have contact with children, adolescents, and vulnerable individuals as part of ABD's services, projects, and programs.	Code of Conduct. Training and education.
EXTERNAL Company personnel suppliers and/or service providers.	Personnel from companies supplying ABD who have any type of contact with the participating children, adolescents, and vulnerable individuals.	Clauses in service contracts.

4. Code of Conduct

ABD's Protection and Positive Treatment Policy aims to guarantee the well-being of children, adolescents, and vulnerable individuals who participate in our organization. ABD expects all professionals who collaborate with us to behave appropriately and with respect towards children, adolescents, and vulnerable individuals.

ABD has a code of conduct (Annex 2) that sets clear boundaries for behavior when working and interacting with children, adolescents and vulnerable individuals. The code of conduct applies to all individuals described in the scope (section 3) of the policy: ABD paid staff, volunteers, representatives, consultants, contractors, and visitors to ABD projects, and any adult who interacts with any child, adolescent, or vulnerable individual within our organization.

The code of conduct must be displayed and accessible at all times to all stakeholders. It is an instrument that must be known and respected by all ABD personnel. ABD will respond decisively to any breach of the code of conduct, and such breaches will be processed and sanctioned in accordance with the applicable disciplinary sanctions regime.

For individuals affiliated with ABD, the issue must be reported to the appropriate supervisor. For visitors, partners, or any other third party, the issue must be reported to any member of ABD staff, who in turn is obligated to report it to their area manager. Any problem must be reported to the designated protection officer within our organization.

All reported breaches will be investigated and appropriate action will be taken. ABD project leaders will ensure that all partner organizations, children and adolescents at risk, family members, participating adults, and any other involved third parties are aware of the code of conduct, the corresponding protocol, and the corresponding action plan (Annex 3).

5. Risk Analysis

ABD makes the protection of the integrity of NNA and PSV in safe and protected environments an objective in all of its areas of action, programs, projects, campaigns, and activities. ABD staff will conduct a systematic risk assessment for their protection in all areas of action, and especially in programs, projects, campaigns, or activities where there is contact with children, adolescents, and people with disabilities, who may be direct participants in the activities or accompanying other participating adults.

At our organization, we will identify risks, analyze them, and establish the steps that will be taken to reduce or mitigate them. In Annex 4 of this policy, you will find the tool we use to carry out this risk analysis. This analysis will be conducted at the beginning of any project, activity, or service and will be reviewed at least annually, coinciding with the time established at the organizational level for carrying out a general context analysis, which allows each area or service to establish its annual action plan.

In our institution we understand that we must pay attention to two levels of risk depending on how these may affect the rights and needs of children, adolescents, and vulnerable individuals:

- Institutional risk. This involves the analysis of generic aspects that are common to the entire organization.
- Specific service risk. This involves analyzing specific aspects of each service or project based on individual characteristics, and analyzing the risks of extraordinary activities performed within the service.

In this process, we will involve children, adolescents, and vulnerable individuals whenever possible. This will take place during the preliminary design of programs, projects, campaigns, or activities and during their formulation phase. Monitoring and updates will be reflected in the interim and final reports of the programs, projects, campaigns, or activities themselves.

This assessment will lead to the corresponding mitigation strategies, essential for the prevention of violence and for the promotion of a safe environment and a culture of good treatment towards children, adolescents, and vulnerable individuals participating in ABD's programs, projects, campaigns and activities (see Risk Map).

6. Personnel Management

6.1. Selection, recruitment and management of personnel (including external service providers)

Throughout the entire human resources management cycle, ABD must reflect its commitment to this policy of protection and respectful treatment. Specifically, through its recruitment processes, ABD must hire individuals who best guarantee the protection and respectful treatment of the children, adolescents, and people with disabilities with whom we work, ensuring that selection criteria include and emphasize the necessary experience for positions involving direct work with children, adolescents, and people with disabilities.

Thus, the selection processes apply the highest standards designed to guarantee the suitability of candidates to work with children and vulnerable individuals, and their understanding of the concepts of protection and respectful treatment. These processes include rigorous controls based on identity verification, reference checks (at least two), requests for a certificate of no sexual offenses, and consultation of criminal records and/or police records, provided that the specific legislation of each country allows it. If this is not the case, the candidate is required to provide a self-declaration regarding any prior history.

6.2. Secure Recruitment Process

Hiring procedures must be based on a detailed analysis of each job to be carried out and the level of contact with children and adolescents and vulnerable individuals (whether direct or indirect). Until the hiring process has been completed, the person involved must not begin working.

The documentation and evidence of a secure recruitment process must be kept until the completion of the Project, and once the Project is completed, the information must be kept or destroyed in accordance with applicable data protection regulations.

All candidates wishing to work at ABD and/or participate in its projects must submit a background check and/or proof of good standing and will be subject to a criminal background check (especially for those working with children, adolescents,, a certificate of no sexual offenses is required). All staff, volunteers, and project/service/activity representatives will be required to sign a criminal background check as part of the selection process. During the interview process, candidates will be asked about previous work with children, adolescents, and vulnerable individuals. Each participant will receive a copy of the protection and well-being policy and the code of conduct, both in the original

and translated into their language.

In this regard, all staff of the organization (contracted personnel, interns, and volunteers) must comply with the provisions of this Policy, as well as its annexes (code of conduct, protocol of action, declaration of institutional commitment, etc.), and adhere to it by signing the letter of adherence (Annex 5). Regarding volunteers, the organization has a volunteer admission process.

Violation of the code of conduct may result in a sanction or corrective measure, except in cases where the violation constitutes or could constitute a crime. In such cases, the institution will report the incident to the relevant authorities, as specified in our internal protocol (Annex 3).

6.3 Awareness and training (risk mitigation)

All actors included within the scope of this policy (see Section 3, Scope) must receive training on the policy. The training must be adapted to the level of contact they have with children, adolescents, and vulnerable individuals, and must be consistent with their respective responsibilities within the organization and in the area of protection and good treatment.

People who are part of the ABD team must receive initial guidance on this during their onboarding process within the organization. This is later reinforced through awareness, refresher, and ongoing training plans, which ensure that they have the necessary skills to properly implement the policy.

To mitigate potential risks and raise awareness among all stakeholders, including children, adolescents, and people with disabilities involved in any ABD project, we created and adopted the following preventative measures:

- Staff, partner organizations, volunteers, representatives, consultants, supporters or visitors to our work, parents and legal guardians, communities, and other stakeholders must be aware of the protection and well-being policy and reporting procedures. These rules must be accessible to all stakeholders at any time.
- The original version of the policy must be translated into local languages and made readily available and understandable. Depending on the context and specific local needs, this should be provided in various formats, such as paper documents and

PDF files, as well as posters or illustrated brochures.

- Each staff member must be aware of the importance of protecting and ensuring the well-being of minors and vulnerable individuals, and must receive the necessary materials appropriate to their work, role, experience, and background.
- Special attention should be paid to raising awareness about the policy of protection and good treatment and forms of self-protection among children, adolescents and vulnerable individuals.
- In the case of services or programs that work directly with children and adolescents, permission must be obtained from both the parents, legal representatives, and from the children and adolescents before the activities are carried out.
- Each participating person is obligated to report any problems of abuse, mistreatment, or neglect to the relevant authorities and security forces of the country if necessary.
- Whenever possible, the "two-adult rule" should be followed: do not be left alone with a child or adolescent and ensure that there are two adult caregivers.
- Staff, volunteers, and any third parties involved in any project must be supervised regularly and must have the opportunity to participate in debates on issues of protection and good treatment.
- Protection must be considered and constantly reviewed at each stage.
- People involved in the project must not discriminate or show differential treatment towards or in favor of any particular child, adolescent, or person in a vulnerable situation.
- Likewise, all staff working in direct contact with children, adolescents and vulnerable individuals must receive training on how to handle a hypothetical situation in which any of these people, adults or minors, reports a concern, suspicion or incident.

Similarly, intensive work must be done to disseminate the policy among the other relevant stakeholders: actors included within its scope (see section 3, scope), local authorities, the educational community, communities in general, and, especially, children, adolescents,

and vulnerable individuals. To this end, it is necessary to have appropriate support materials, such as translations of the policy into local languages and user-friendly versions that are more accessible and adapted to the different target groups.

6.4. Protection and Good Treatment Delegate

A Protection and Well-being Officer will be appointed. This person's duties are:

- Promote awareness of policy and procedures among all stakeholders so that everyone is aware of personal responsibilities regarding participation in ABD projects/services/activities.
- To train and facilitate information sessions regarding existing policy.
- Contact, support and assist the teams in the implementation of the policy and the various tools that comprise it: code of conduct, risk map, action plan, protocol and action plan, etc.
- Assist the ABD human resources manager in induction and training on protection and good treatment matters, this includes advising on any specific training and safe recruitment process.
- To be the designated person to receive reports or notifications regarding violent situations that violates the rights of children, adolescents or vulnerable individuals, or cases of suspicion, disclosures, or communications related to breaches of the code of conduct • Ensure that reported situations are handled in accordance with policy, guaranteeing that ABD fulfills its responsibility.
- Safeguard written records and advise on the proper maintenance of data of children, adolescents, and vulnerable individuals.
- Seeking advice from management, relevant bodies, and maintaining contact with relevant authorities and law enforcement agencies in the country (e.g., police or social services)
- To provide advice and recommendations regarding the review, updating or modification of the protection policy and procedures in accordance with changes in legislation or best practices.
- In the case of children and adolescents, project leaders will ensure that individuals

designated as Child Protection Agents receive adequate training to fulfill this role, which will be specifically addressed as part of personal development plans and annual evaluation processes.

- It must be emphasized, understood, and widely accepted that the responsibility for the protection and good treatment of minors and vulnerable individuals does not only fall on the figure of the Protection Delegate, but on every person involved in the project and the institution as a whole.

6.5. Local partner organizations and associated responsibilities

ABD must ensure that children, adolescents, and people with disabilities participating in the programs, projects, campaigns, and activities of its partner organizations enjoy the organizational protection standards established by this policy. Therefore, all of ABD's local partner organizations must comply with it. To this end, ABD must:

- Promote training for local partner organizations and ensure ongoing discussion and monitoring regarding the protection and good treatment of children, adolescents, and vulnerable individuals.
- Promote the development of local partner organizations' own protection and good treatment policies, ensuring they are consistent with this document, and provide the necessary support for their development and implementation.

When selecting partner organizations, special consideration should be given to the suitability and experience of the potential partner in working with children, adolescents, and vulnerable individuals.

Local partner organizations must:

- To subscribe to this policy within the framework of the programs, projects, campaigns, or activities implemented jointly, and to document this by having the organization's representative and all participating staff sign the corresponding Declaration of Commitment to the Protection and Good Treatment Policy (see Annex 5, Declaration of Commitment to the Protection and Good Treatment Policy). Signing the Declaration of Commitment is a prerequisite for forming a partnership with the leading organization, ABD.
- Local partner organizations are expected to maintain conduct consistent with this

policy throughout all their activities. Should a breach of this policy be detected, ABD may consider terminating the relationship.

- Send a copy of the policy to the head of the organization's children's commission. If there are any questions or gaps in the policy, ABD will discuss them with the organization in question to agree on any necessary changes.
- Provide ABD with the name of a Protection Officer (or designated lead person) within the organization who is responsible for and in charge of communication regarding these matters.
- Sign the ABD "Declaration of Commitment" regarding the protection and good treatment of children, adolescents and vulnerable individuals.
- Implementing partners who do not have a policy for the protection and good treatment of children, adolescents, and vulnerable individuals must:
 - a) Develop their own Protection and Good Treatment Policy or adapt ABD's policy for their own use. Assistance with either process will be available from the ABD representative or the person responsible for Programs and the Protection Committee, within the framework established above.
 - b) Sign the "declaration of commitment" before reaching an agreement or receiving funds.
 - c) Provide ABD with the name of a Protection Agent (or lead person) within the organization with responsibility and in charge of the communication on these issues.

7. Response in case of concern, suspicion or incident

ABD will respond appropriately to each and every situation of neglect, suspicion, complaint and communication related to the rights of children, adolescents, and vulnerable individuals with whom we work.

All persons included within the scope of this policy (see Section 3, Scope) have the responsibility and obligation to report any situation if they have reasonable grounds to suspect that an NNA or a person in a vulnerable situation is suffering harm or is at risk of suffering harm, including any concern, suspicion, or incident involving behavior that violates the Protection and Good Treatment Policy. Reports can be made through the

following email address (proteccioninfancia@abd-ong.org) and must be submitted within 24 hours of becoming aware of the situation, using the procedures established for this purpose (protocol and response procedure, Annex 3). Likewise, the organization must provide an initial response within 72 hours of receiving the report.

No person will be adversely affected in their contractual relationship with ABD for reporting concerns, suspicions, or incidents, unless a due investigation demonstrates bad faith in the reporting. Similarly, if a person knowingly chooses not to report a concern, suspicion, or incident, they may be subject to disciplinary action. All reports are accepted and taken seriously.

Concerns, suspicions, and incidents may be of the following types:

- a) Direct observation of a case of violence against a child or adolescent in a vulnerable situation.
- b) Disclosure or indication, by third parties, of a case of potential violence against a child or adolescent or person in a vulnerable situation within or outside the entity.
- c) Non-compliance with this policy or its associated procedures by any person included within the scope of this policy.
- d) Knowledge of legal or judicial procedures related to violence against children or vulnerable individuals that have been applied to any person included in the scope of this policy.

Our organization's data protection policy includes incident reporting forms that capture all aspects of an incident from its inception to its closure. This ensures complete traceability of the information. This information will be stored securely and will only be accessible to designated case managers.

ABD will provide direct or indirect support (by activating a network of resources) to children, adolescents, their families, and other vulnerable individuals. ABD will also adhere to the external protocols developed by each public administration.

8. Dissemination and communication

This policy will be disseminated internally via email to all relevant parties (section 3, scope). Externally, it will be shared through social media. In addition, the document will be available on the organization's website.

The dissemination and communication plan will be developed in the annexes to this document and will be linked to ABD's general dissemination and communication plan. In addition, the Communication Plan will include strategies for communicating the Policy to NNA and their families, as well as to people in vulnerable situations, using language that is adapted and accessible to them.

The existence of a policy, a designated person (delegate), and a program (action plan) in itself constitutes a preventive measure. Communicating this properly is a way of preventing harm; therefore, ABD is committed to developing a Dissemination and Communication Plan to ensure this.

9. Review and follow-up

ABD, within the framework of its protection and good treatment policy, has a special interest in acquiring tools that serve for the monitoring and evaluation of actions proposed. Annually, and within the entity's annual action plan on this matter (Annex 7), we will have an evaluation of the compliance indicators for each action. This evaluation will serve to assess how the process is progressing in relation to the protection and well-being of children, adolescents, and vulnerable individuals within the entity (Annex 8, Annual Action Plan Evaluation Report).

The action plan is an operational instrument that outlines the actions our institution intends to undertake over a period of one year to implement our protection and good treatment policy and to address the risks identified in the risk analysis.

We understand that the work of protecting and treating children is a process affected by both external and internal changes. Therefore, every four years we will conduct a policy review. This strategic process will involve the participation of the various collective bodies within our organization (Quality Committee, Ethics Committee, and Protection Committee) to contribute elements that should be incorporated into the policy.

To carry out the monitoring process, an annual action plan (Annex 7) will be developed by the Protection and Good Treatment Commission in conjunction with the ABD Quality Commission. This plan will be evaluated semi-annually to monitor the planned actions and verify that they have been effectively implemented, taking into account the defined indicators.

Likewise, an annual evaluation report of the plan will be prepared (Annex 8), which will report on the implementation of the plan and serve as the basis for preparing the action plan for the following year.

At ABD, a series of specific structures have been established whose purpose is to more directly manage the implementation and monitoring of this policy. At the global level, a Protection Committee has been created, made up of a number of people representing the organization as a whole, whose main functions are:

- Dissemination of this policy among all actors included in Section 3, Scope, complemented by ongoing awareness-raising and training activities, as established in Section 6, Personnel Management: Awareness and Training.
- Implementation: Putting this policy, its tools, and its corresponding action plans into practice, ensuring compliance with and application of the principles set out in them.
- Monitoring and Evaluation: Regular monitoring and evaluation of the implementation of the relevant action plans through analysis of the indicators contained within them. Additionally, it should be noted that ABD has a Quality Committee that is subject to both internal and external audits. One of its functions is to verify the proper implementation of internal policies.
- Knowledge Sharing: Systematization and dissemination of good practices and lessons learned.
- Review: This policy is reviewed every 4 years, and any proposed modifications are submitted to the Management Committee.

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