



# Child Protection Policy Statement

## 1. Policy Statement

The Hub Nicosia Ltd acknowledges the duty of care to safeguard and promote the welfare of children and is committed to ensuring safeguarding practice reflects statutory responsibilities, government guidance and complies with best practice and requirements.

This policy reflects national legislation, European standards, and international frameworks, including the **UN Convention on the Rights of the Child**, and is aligned with best practices in safeguarding within EU-funded projects.

The policy recognises that the welfare and interests of children are paramount in all circumstances. It aims to ensure that regardless of age, ability or disability, gender reassignment, race, religion or belief, sex or sexual orientation, socio-economic background, all children

- have a positive and enjoyable experience of sport in a safe and child centred environment
- are protected from abuse whilst participating in activities provided by our organisation.

The Hub Nicosia Ltd acknowledges that some children, including disabled children and young people or those from ethnic minority communities, can be particularly vulnerable to abuse and we accept the responsibility to take reasonable and appropriate steps to ensure their welfare.

As part of our safeguarding policy, The Hub Nicosia Ltd will:

- promote and prioritise the safety and wellbeing of children and young people
- ensure everyone understands their roles and responsibilities in respect of safeguarding and is provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children and young people
- ensure appropriate action is taken in the event of incidents/concerns of abuse and support provided to the individual/s who raise or disclose the concern
- ensure that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored
- prevent the employment/deployment of unsuitable individuals
- ensure robust safeguarding arrangements and procedures are in operation.

## 2. Scope and Applicability

The policy and procedures will be widely promoted and are mandatory for everyone involved at The Hub Nicosia Ltd, including:

- Permanent and temporary staff,
- Volunteers and interns,

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- Trainers, facilitators, and consultants,
- Partner organisations and subcontractors,
- Visitors and external stakeholders.

Failure to comply with the policy and procedures will be addressed without delay and may ultimately result in dismissal/exclusion from the organisation.

### 3. Definitions

- **Child:** Any person under the age of 18.
- **Youth:** Young people aged 18–30 participating in youth activities.
- **Abuse:** Physical, emotional, sexual, or psychological harm, including neglect.
- **Safeguarding:** Preventive and responsive actions taken to protect children and youth.
- **Informed consent:** Freely given permission with full understanding of implications.

### 4. Entry Training and Capacity Building

The Hub Nicosia Ltd ensures that all staff, volunteers, facilitators, trainers, and associates who work directly or indirectly with children and young people receive mandatory safeguarding training prior to engagement in any activity.

Entry safeguarding training is compulsory and includes:

- Understanding the principles of child protection and safeguarding.
- Awareness of children's rights under the **UN Convention on the Rights of the Child**.
- Recognition of signs and indicators of abuse, neglect, exploitation, or emotional harm.
- Appropriate conduct, boundaries, and professional behaviour when working with children.
- Procedures for reporting concerns, suspicions, or disclosures.
- Confidentiality obligations and data protection responsibilities.

No individual is allowed to engage in activities involving children without completing this entry training.

The Hub Nicosia Ltd commits to:

- Providing refresher safeguarding training at regular intervals,
- Integrating safeguarding discussions into staff meetings and project briefings,
- Ensuring safeguarding guidance is adapted to specific activities (workshops, events, Youth Cafés, digital activities, mobility events).

Safeguarding competence is considered a core professional responsibility for all individuals involved in youth and child-related activities.

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## 5. Code of Conduct –Behavioural Standards

The Hub Nicosia Ltd maintains a **strict Code of Conduct** to ensure that children and young people are treated with dignity, respect, and care at all times.

### Expected Behaviour

All individuals must:

- Treat children and young people with respect, fairness, and non-discrimination,
- Maintain clear **professional boundaries** at all times,
- Act as positive role models in behaviour, language, and attitude,
- Ensure interactions take place in safe, open, and appropriate environments,
- Obtain consent before any activity involving personal data, images, or participation,
- Immediately report any safeguarding concerns.

### Unacceptable Behaviour

The following behaviours are **strictly prohibited**:

- Any form of physical, emotional, sexual, or psychological abuse,
- Sexual relationships or any form of inappropriate physical contact with minors,
- Physical punishment, intimidation, or threatening behaviour,
- Use of humiliating, degrading, or discriminatory language,
- Being alone with a child in a private or unsupervised setting without justification,
- Sharing personal contact details or engaging in private digital communication with minors without organisational authorisation,
- Taking photographs, videos, or recordings of children without **prior written consent**,
- Exploiting children for labour, publicity, fundraising, or personal benefit,

Any breach of the Code of Conduct results in immediate disciplinary action, which may include suspension, termination, or referral to authorities.

## 6. Safe Recruitment and Selection Procedures

The Hub Nicosia Ltd applies robust and transparent safe recruitment practices to prevent the engagement of individuals who may pose a risk to children.

### Recruitment Safeguards

All recruitment and selection processes include:



- Clear role descriptions outlining safeguarding responsibilities,
- Assessment of candidates' suitability to work with children,
- Verification of identity and qualifications,
- Reference checks prior to appointment,
- Criminal record checks where legally permissible under national law.

Safeguarding considerations are embedded at **every stage** of recruitment.

### **Engagement of External Actors**

For consultants, facilitators, volunteers, and partner staff:

- Safeguarding expectations are clearly communicated,
- Compliance with this policy or an equivalent safeguarding framework is required,
- A declaration of commitment to child protection principles must be signed.

The Hub Nicosia Ltd reserves the right to **exclude any individual** who does not meet safeguarding standards.

## **7. Data Protection, Images, and Informed Consent**

The Hub Nicosia Ltd is fully committed to protecting the **privacy, dignity, and personal data** of children and young people in line with **GDPR** and national data protection legislation.

### **Data Protection Principles**

- Personal data is collected only when strictly necessary,
- Data is processed lawfully, transparently, and securely,
- Access to personal data is restricted to authorised personnel,
- Data is retained only for the period required by law or project needs.

### **Informed Consent**

Written informed consent from a **parent or legal guardian** is required before:

- A child participates in activities involving data collection,
- Images, videos, audio recordings, or testimonials are captured,
- Personal information is shared or published.

Children are informed, in age-appropriate language, about how their data will be used.

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### **Use of Images and Media**

- Children must be portrayed respectfully and accurately,
- Images that depict distress, vulnerability, or victimisation are prohibited,
- No identifying information is published without consent,
- Digital materials are stored securely and handled responsibly.

Consent may be withdrawn at any time without negative consequences.

## **8. Reporting Procedures**

Any concern, suspicion, or allegation of abuse must be reported **immediately**.

### **Reporting steps:**

1. Inform the designated Child Protection Focal Point of The Hub Nicosia Ltd.
2. Record the concern accurately and confidentially.
3. Where required, refer the case to relevant national authorities.

All reports are handled with confidentiality and in line with data protection laws.

## **9. Complaint and Whistleblowing Mechanism**

Children, parents, staff, and stakeholders have the right to raise concerns safely.

- Complaints can be submitted verbally or in writing.
- Anonymous reporting is permitted.
- Retaliation against whistleblowers is strictly prohibited.

All complaints are taken seriously, investigated promptly, and addressed appropriately.

## **10. Monitoring and Review**

This policy is:

- Communicated to all relevant stakeholders.
- Monitored regularly by management.
- Reviewed every **three years**, or earlier if required by:
  - legislative changes,
  - incidents or organisational learning.

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## 11. Declaration

Failure to comply with this policy may result in disciplinary action, including termination of employment or cooperation.

### Signed:

George Isaias  
Director, The Hub Nicosia Ltd

Last reviewed 15 October 2025, Nicosia, Cyprus.

Updated 2<sup>nd</sup> February 2026, Nicosia, Cyprus.