CHILD PROTECTION POLICY (CPP)

HUB Nicosia

2026-2028

Public document | Keeping Children Safe Child Safeguarding Standards



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PART 1: INTRODUCTION

1. About Hub Nicosia

Hub Nicosia is an educational NGO based in Nicosia, Cyprus.

Hub Nicosia aims to mobilise youth to fully engage in civic, political and economic life. It offers learning opportunities for strengthening skills such as:

- Soft skills for empowerment, democratic participation and active citizenship
- Employment skills to assist youth transition into employment
- Enterprise skills so they can start their own enterprises

In addition, Hub Nicosia develops new skills for professionals in the creative and cultural sector, promotes intercultural dialogue and shared EU values through the arts, and equips youth and educators to act on global issues and sustainable development.

It is also a co-working space and a community of individuals, organisations and enterprises with cultural, environmental or social aims, housed in a renovated old house in the Agios Andreas district of Nicosia. Hub Nicosia is a member of the European Creative Hubs Network.

Because many of our participants are young people, some of them under 18, and because children may be present in our shared spaces, keeping children safe is central to how we work.

1.1 National context in Cyprus

Cyprus has ratified the UN Convention on the Rights of the Child (UNCRC) and the Council of Europe Lanzarote Convention. The Prevention and Combating of Sexual Abuse and Sexual Exploitation of Children and Child Pornography Law of 2014 (Law 91(I)/2014) transposes Directive 2011/93/EU and requires that people working with children are screened. The Social Welfare Services and the Cyprus Police are the competent authorities for child protection.

Since 2017, the Children's House, run by Hope For Children on behalf of the Social Welfare Services, provides child victims of sexual abuse with all services in one place, following the Barnahus model. The Commissioner for Children's Rights monitors children's rights in Cyprus.

1.2 About this Child Protection Policy

Hub Nicosia commits to keeping every child it comes into contact with safe from harm. This Child Protection Policy (CPP) 2026-2028 is a formal statement of this commitment. It is a

public document, endorsed by our Board, with dedicated human and financial resources to implement it.

The CPP has been developed in line with the four areas of the Keeping Children Safe Child Safeguarding Standards (**Policy, People, Procedures and Accountability**), Cypriot legislation, and the requirements of EU programmes including CERV, Erasmus+, ESC and Horizon Europe. It complements our Gender Equality Plan 2026-2028, in particular its commitments on preventing gender-based violence and harassment.

Scope. The CPP applies to Board members, staff, trainers, facilitators, interns, volunteers, consultants, contractors, project partners, venue hosts, and co-working members and visitors when they take part in our activities (together, "representatives"). It covers conduct online and offline, at work and, where relevant to suitability to work with children, outside it.

Definitions.

Term	Meaning
Child	Any person under 18 years old (UNCRC)
Child abuse	Physical, emotional and sexual abuse and exploitation, and neglect, including online abuse and commercial exploitation
Child safeguarding	Measures that ensure our people, operations and programmes do no harm to children, and that concerns are reported and acted on
Designated Safeguarding Officer (DSO)	The trained person who receives and manages safeguarding concerns

1.3 Theory of Change and its relation to the Child Protection Policy

Hub Nicosia's Theory of Change outlines how its activities drive systemic social change, with a focus on youth, social innovation and human rights. It rests on the assumption that empowering and engaging young people leads to fairer, more inclusive and sustainable societies, which is only possible when young people are safe.

The CPP supports the three pillars of the Theory of Change:

1. **Organisational change:** policies, safe recruitment and a culture of zero tolerance make Hub Nicosia a safe place for children and young people.
2. **Individual change:** training equips staff, volunteers and youth leaders to recognise and respond to risks, and children learn about their right to be safe.
3. **Societal change:** child-safe project design and partnerships spread good safeguarding practice across the organisations and communities we work with.

1.4 Objectives and principles of our CPP

The CPP's goal is an organisation where every child is treated with dignity and protected from harm. The main objectives are:

- 100% of staff and volunteers in contact with children screened and holding valid police certificates;
- 100% of representatives trained in safeguarding within their first month;
- a safeguarding risk assessment for every activity involving children;
- clear, accessible reporting channels for adults and children, with every concern handled within 24 hours;
- safeguarding clauses in all partnership agreements involving children.

Our principles:

- **Zero tolerance** of abuse and exploitation of children.
- **Best interests of the child** come first in every decision.
- **Equal protection** for every child regardless of gender, disability, ethnicity, religion, sexual orientation, migration status or background.
- **Shared responsibility:** everyone must report concerns; nobody investigates alone.
- **Participation:** children are listened to and involved in matters that affect them.
- **Confidentiality:** information is shared on a need-to-know basis.

PART 2: KEY ACTIONS AND MEASURES

2. Institutional Commitment and Governance

KCS STANDARD 1 · POLICY

Hub Nicosia declares its commitment to keeping children safe through this publicly available and formally adopted CPP, approved by the Board and signed by every representative.

2.1 Governance Structure

- **Board:** approves the CPP, holds overall accountability and receives an annual safeguarding report.
- **Designated Safeguarding Officer (DSO):** receives and records concerns, makes referrals to the authorities, advises staff, and coordinates training and risk assessments.
- **Deputy DSO:** the Director, who acts when the DSO is unavailable or implicated.
- **Gender Equality Committee (GEC):** the DSO reports to the GEC quarterly on safeguarding, so that child protection and the prevention of gender-based violence are monitored together.
- **Project managers:** carry out risk assessments for their activities and ensure partners comply.

2.2 Executive Leadership

Accountability and strategic focus are ensured through the Director of Hub Nicosia. Child safeguarding is integrated into project design, risk and impact assessment tools.

3. Resources and Capacity

Hub Nicosia will provide the necessary resources:

- **Human resources:** a named DSO and deputy, with safeguarding hours built into project budgets
- **Financial resources:** budget for police certificates, training and specialist advice, included in every project involving children
- **External resources:** Hope For Children, Social Welfare Services, psychologists and legal professionals
- **Digital resources:** secure, access-restricted storage for safeguarding records and e-learning resources

4. Safe Recruitment and Vetting

KCS STANDARD 2 · PEOPLE

For every role involving contact with children, including volunteers and freelance trainers:

- Job descriptions state the safeguarding responsibilities of the role.
- Interviews include questions on safeguarding and attitudes to children.
- At least two references are checked; identity and gaps in employment are verified.
- Two Cyprus Police certificates are obtained before the person starts and renewed every year: a **clean criminal record certificate** (Law 73(I)/2004, Article 10) and a **certificate of non-inclusion on the list of convicted sex offenders** (Law 91(I)/2014, Article 22(6)). Non-Cypriot candidates provide equivalent certificates from their country of residence.
- Every new representative signs this CPP and the Code of Conduct (Annex A).

5. Code of Conduct

Representatives **must**:

- Treat children with respect and dignity, and listen to them.
- Plan activities so that at least two adults are present, or the adult and child remain visible to others.
- Use appropriate language, and physical contact only when appropriate and the child is comfortable.
- Obtain informed consent from the child and a parent/guardian before taking or using images or stories.
- Report any concern or breach to the DSO immediately.

Representatives **must never**:

- Hit, physically assault, humiliate, threaten or emotionally abuse a child.
- Engage in any sexual activity or relationship with a child, or act in a sexually provocative way.
- Spend time alone with a child out of sight of others, or invite a child to their home.
- Contact children through private messages or personal social media; only official channels, with a parent/guardian copied.
- Give gifts, money or favours, or show favouritism to a child.
- Supply alcohol, tobacco or drugs to a child, or work with children under their influence.
- Access, create or share child sexual abuse material.
- Employ children in any form of child labour.

Breaches lead to disciplinary action, up to dismissal or ending of contracts, and referral to the authorities where a law may have been broken.

6. Training and Awareness

At Hub Nicosia, training is a mechanism for keeping children safe. We have the following in place:

- Mandatory safeguarding induction for all representatives within their first month
- Refresher training at least every two years for those in contact with children
- Specialist training for the DSO and deputy
- Training on recognising abuse, the Code of Conduct, reporting, online safety and safe use of images
- Age-appropriate sessions for young participants on their right to be safe and how to raise a concern

7. Safe Programmes, Activities and Online Safety

KCS STANDARD 3 · PROCEDURES

Every project, workshop, event, trip or online activity involving children is designed to minimise risk:

- A safeguarding risk assessment (Annex B) is completed with the DSO before the activity and reviewed afterwards.
- Written parental/guardian consent is obtained for every child, with emergency contacts and medical information.
- At least two adults supervise each group; ratios are set by age and risk.
- Spaces used by children are separated from general co-working areas.
- For travel and residential events, chaperones are screened and briefed, and children never share rooms with adults.
- Online sessions use organisational accounts, have at least two adult hosts, and are recorded only with prior consent; private one-to-one online contact with children is not allowed.

8. Communications, Images and Data Protection

- Images and stories of children are used only with informed, written consent from the child and parent/guardian, which can be withdrawn.
- Children are shown in a dignified way; names, addresses, schools or other identifying details are never published alongside images.
- Stories are checked for any risk they could pose to the child or family.
- Safeguarding records are kept confidential in access-restricted storage, available only to the DSO and Director, in line with the GDPR and Law 125(I)/2018.

9. Reporting and Responding to Concerns

At Hub Nicosia, every concern is taken seriously. Anyone who sees, suspects or is told about harm to a child, or a breach of this CPP, must act the same day:

4. **Make the child safe.** If a child is in immediate danger, call **112**.
5. **Listen and reassure.** Stay calm, do not ask leading questions, do not promise secrecy.
6. **Record** what was seen or said, in the child's own words, with date and time (Annex C).
7. **Report to the DSO** within 24 hours, or to the Director if the DSO is involved, or to the Board Chair if both are.
8. **Do not investigate** or confront the alleged perpetrator.

The DSO then:

- assesses the concern within 24 hours and records the decision;
- refers suspected crimes or significant harm to the Cyprus Police and/or Social Welfare Services without delay, who refer cases of child sexual abuse to the Children's House;
- suspends an implicated representative from contact with children while the matter is handled (a neutral act);
- offers support to the child and family;
- informs funders and partners as required by grant agreements, sharing only necessary data;
- feeds lessons learned into risk assessments and training.

Children, parents and the public can report directly to the DSO, anonymously through the website contact form, or externally to the Police, Social Welfare Services, or the 24/7 Hope For Children helpline **1466**. Anyone who reports in good faith is protected from retaliation.

10. Partners and the Co-working Community

KCS STANDARD 4 · ACCOUNTABILITY

- Partners and sub-grantees working with children must have a policy meeting the Keeping Children Safe standards, or adopt this CPP.
- Safeguarding clauses are included in partnership agreements and contracts, with the right to end the agreement for serious breaches.
- Co-working members and visitors are informed of expected behaviour when children are on the premises.

11. Implementation Timeline and Milestones

Action	Responsible	Timeline	Indicator
Board adoption and	Director + Board	Q4 2026	CPP online; signed

Action	Responsible	Timeline	Indicator
public CPP launch			
DSO and deputy appointed and trained	Director	Q4 2026	Training certificates
Police certificates for all relevant staff and volunteers	HR/Admin	Q4 2026, renewed annually	100% valid certificates
Safeguarding induction and refresher training	DSO + external trainer	Q1 2027, repeat every 2 years	Completion rate
Risk assessment for every activity with children	Project managers + DSO	Ongoing from Q4 2026	% of activities assessed
Safeguarding clauses in partner agreements	Project managers	Q2 2027	% of agreements with clauses
Child-friendly summary shared with participants	DSO + youth reps	Q2 2027	Summary in Greek and English
Midterm review	Director + DSO + GEC	Q4 2027	Review report
Final review and renewal	Director + Board	Q4 2028	Updated CPP

12. Monitoring, Evaluation and Accountability

- The DSO keeps a confidential log of all concerns and how they were handled.
- The DSO reports quarterly to the GEC and annually to the Board: number and type of concerns (anonymised), training completed, risk assessments done, and improvements made.
- Feedback from children and families is collected in project evaluations.
- The CPP is reviewed every two years, or sooner after a serious incident, a change in law or a new type of activity.

The table below maps this CPP to the four Keeping Children Safe areas:

KCS area	Where in this CPP	Evidence held
1. Policy	Sections 1.2, 1.4, 2	Board-approved CPP, published online; child-friendly summary
2. People	Sections 4, 5, 6	Signed Codes of Conduct; police certificates; training log

KCS area	Where in this CPP	Evidence held
3. Procedures	Sections 7, 8, 9	Risk assessments; consent forms; incident reports
4. Accountability	Sections 10, 12, 13	Concerns log; annual Board report; partner agreements

13. Dissemination and Transparency

The CPP is published on www.hubnicosia.org, shared with all representatives and partners at induction, and displayed at our premises. A child-friendly summary (Annex D) is given to every child taking part in our activities, in Greek and English and other languages as needed.

14. Risks and Mitigation Measures

Risk	Mitigation
Adults from the co-working community in contact with children	Separate spaces for children's activities; supervision; briefing for members
Volunteers or freelancers starting before checks are complete	No contact with children until both police certificates are received
Concerns not reported due to fear or uncertainty	Training; anonymous reporting; protection from retaliation
Online harm during virtual activities	Organisational accounts, two hosts, no private one-to-one contact
Partners with weaker standards	Due diligence and safeguarding clauses in agreements

15. Conclusion

Through this Child Protection Policy, Hub Nicosia commits to being a place where every child and young person is safe, respected and heard. Together with our Gender Equality Plan, it is part of our broader mission of building fair and inclusive communities.

CONTACTS AND APPROVAL

Contact	Name	Telephone / email
Designated Safeguarding Officer	[Name]	[email] / [phone]
Deputy DSO (Director)	[Name]	[email] / [phone]
Board Chair	[Name]	[email]
Emergency (Police, Ambulance)	-	112
Cyprus Police - reporting child sexual abuse	-	22 808442
Social Welfare Services - Nicosia District Welfare Office	-	22 804605 / 22 804607
Social Welfare Services - Nicosia City Centre office	-	22 804709
Hope For Children helpline (24/7)	-	1466
European helpline for children and adolescents	-	116 111
European hotline for missing children (24/7)	-	116 000

Approved by the Board of HUB Nicosia on: ___Nov 1st, 2026_____

Next review due: ____Q4 2027_____

Signed: _____  _____ George Isaias , Director



ANNEXES

Annex A - Individual Commitment

I, _____, have read and understood the HUB Nicosia Child Protection Policy and Code of Conduct. I agree to follow them, and I understand that a breach may lead to disciplinary action and referral to the authorities.

Signature: _____ Role: _____ Date: _____

Annex B - Activity Risk Assessment Template

Activity / risk	Likelihood (L/M/H)	Impact (L/M/H)	Mitigation	Owner
e.g. Children in shared co-working area	M	H	Separate room, signage, two adults present	Project manager
e.g. Online workshop	M	M	Org account, waiting room, two hosts, no recording without consent	Facilitator
e.g. Photos at event	H	M	Written consent, no names published, no-photo lanyards	Comms lead

Annex C - Incident Report Form

Field	Details
Name and role of person reporting	
Date, time and place of the incident or disclosure	
Child's name and age (if known)	
What was seen, heard or said (child's own words)	
People involved or witnesses	
Action taken so far	
Date/time reported to DSO, and signature	

Annex D - Child-Friendly Summary

You have the right to be safe at HUB Nicosia. Adults here must treat you with respect, never hurt you, and never ask you to keep secrets. If anything makes you feel uncomfortable or unsafe, tell an adult you trust our Safeguarding Officer, Irene Che, or call 1466. We will listen to you and help.