



# Child Protection Policy

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## **Preamble**

Sistema Cyprus is a social-music orchestra and choir programme established in 2017. Sistema Cyprus offers music education to the children and young people of Cyprus, including migrants, refugees and children and young people with fewer opportunities, and ensures that these groups are respected, recognised, and included in the society. No matter their origin, nationality, or religion: the members of Sistema Cyprus are inspired to dream and strive for a more welcoming society and a better future.

The policy applies to activities organised, hosted or participated in by Sistema Cyprus, including local and international activities. This policy was issued in Nicosia in March 2019 and applies to all Sistema Cyprus activities and locations. Its first review was approved in September 2021, its second review in February 2024 and its third review in September 2026.

# **PART I**

## **1. INTRODUCTION**

Sistema Cyprus provides free, high-quality orchestral music education to children and young people from diverse cultural, linguistic and socioeconomic backgrounds, particularly those with fewer opportunities. Through sustained participation in instrumental learning, ensembles, performances and community activities, participants develop their musical abilities, confidence, agency, relationships and sense of belonging.

Sistema Cyprus is committed to creating an inclusive and respectful environment in which every participant is treated with dignity, can express their views, feels safe and is supported to reach their potential. Safeguarding is integral to the organisation's music education and youth-development practice and applies across its regular programmes, performances, trips, international mobilities and online activities.

# **PART II**

## **2. SCOPE, PRINCIPLES AND DEFINITIONS**

### **Scope of this Policy**

The purpose of this policy is to protect children and young people participating in activities organised, hosted or attended by Sistema Cyprus and to ensure that any concern about their safety, rights or wellbeing is identified, reported and addressed appropriately.

The policy aims to:

- establish clear safeguarding principles, responsibilities and procedures;
- support staff, Teaching Artists, volunteers, partners and associates in maintaining safe and respectful practices;
- prevent abuse, exploitation, neglect, bullying and other forms of harm;



- ensure that concerns and disclosures are handled promptly, sensitively and in accordance with applicable procedures and legislation; and
- ensure that children and young people understand their rights and know how and where to seek support.

This policy applies across Sistema Cyprus's regular programmes, performances, workshops, trips, international mobilities, residential activities, online activities and other organisational events.

It applies to everyone acting for, working with or representing Sistema Cyprus.

**Staff and programme team include:**

- founders of the programme;
- all employees;
- Teaching Artists and other educators;
- volunteers and interns;
- accompanying persons and group leaders; and
- anyone responsible for supervising or supporting participants.

**Associates include:**

- contractors, consultants and service providers;
- directors and members of the organisation's governing body;
- partner organisations and their representatives;
- photographers, media professionals and researchers;
- guests and visitors; and
- any other person who may come into contact with participants through Sistema Cyprus activities.

**Principles of the Policy**

This policy is guided by applicable Cypriot legislation, the United Nations Convention on the Rights of the Child, relevant European Union principles and internationally recognised safeguarding standards.

Sistema Cyprus is committed to the following principles:

- the safety, welfare and best interests of every child will be paramount;
- all children and young people have an equal right to protection from abuse, exploitation, neglect, bullying, discrimination and other forms of harm;
- every participant will be treated with dignity and respect, regardless of age, disability, gender, gender identity, sexual orientation, nationality, ethnicity, religion, migration or residence status, language, socioeconomic background or any other characteristic;
- the views, wishes and feelings of children and young people will be heard and taken seriously, in accordance with their age, maturity and communication needs;



- activities will be designed and delivered in ways that promote inclusion, participation, safety and equal access;
- safeguarding is a shared responsibility, and everyone representing Sistema Cyprus must prevent harm, report concerns and follow the procedures established in this policy;
- information will be handled sensitively and shared only with those who need it to protect the child or young person; and
- Sistema Cyprus will work appropriately with families, partner organisations and relevant authorities to protect participants and respond to concerns.

### Definitions

- A **child** is any person under the age of 18, as defined by the United Nations Convention on the Rights of the Child.
- A **young person** refers in this policy to a participant in Sistema Cyprus's youth activities. Young people aged 18 or above are not legally children but remain entitled to appropriate safeguarding, support and duty of care.
- **Safeguarding** means the measures taken to prevent harm, protect children and young people, promote their welfare and respond appropriately to concerns.
- **Abuse** is understood in accordance with the applicable Cypriot legal framework and jurisprudence, as well as relevant European and international standards. It includes any action or failure to act that causes, or creates a risk of, harm to a child or young person. It may include physical abuse, emotional abuse, sexual abuse, exploitation, bullying, online harm or neglect.
- Abuse may occur within a family, institutional, community, activity or online setting. It may be committed by an adult or another child or young person, whether known or unknown to the person affected.

### *Physical abuse*

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill-health to a child whom they are looking after.

### *Emotional abuse*

Emotional abuse is the persistent emotional ill treatment of a child, such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. It may involve causing children to frequently feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of ill treatment of a child, though it may occur alone.



### ***Sexual abuse***

Sexual abuse involves engaging, forcing, pressuring, manipulating or enticing a child or young person to participate in sexual activities. It may involve physical contact or non-contact activities, including grooming, sexualised communication, exposure to sexual content, the creation or sharing of sexual images, or encouraging a child or young person to behave in sexually inappropriate ways. Sexual abuse may take place in person or online and may be committed by an adult or another child or young person.

### ***Bullying***

Bullying is behaviour intended to hurt, intimidate, humiliate, exclude or control another person and commonly involves an imbalance of power. It may be physical, verbal, emotional, discriminatory, relational or sexual and may take place in person or online. Bullying is often repeated, but a serious single incident may also require safeguarding action.

### ***Neglect***

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. It may involve a parent or carer failing to provide adequate food, shelter and clothing, failing to protect a child from physical harm or danger, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

### ***Online harm***

Online harm includes bullying, harassment, grooming, sexual exploitation, inappropriate communication, exposure to harmful content, misuse of personal information and the creation or sharing of images without appropriate consent. It may occur through social media, messaging services, gaming platforms, email or any other digital environment.



Sistema Cyprus is committed to safeguarding the welfare, rights and dignity of all children and young people participating in its activities and to protecting them from abuse, exploitation, neglect, bullying, discrimination and other forms of harm.

Sistema Cyprus will provide a safe, inclusive and respectful environment in all its regular programmes, performances, workshops, trips, residential activities, international mobilities and online activities. Staff, Teaching Artists, volunteers, partners and associates must respect participants' rights, safety and wellbeing and conduct themselves in accordance with this policy and the values of Sistema Cyprus.

This policy is approved by the management of Sistema Cyprus and overseen by the Designated Child Protection Persons. It will be reviewed at least every two years and whenever changes in legislation, organisational activities, identified risks or safeguarding practice make an earlier review necessary.

Sistema Cyprus will safeguard children and young people by:

- maintaining and implementing clear safeguarding procedures and Codes of Conduct;
- informing children, young people and families about their rights and available reporting routes;
- providing safeguarding information, guidance and training to staff, Teaching Artists, volunteers and relevant partners;
- applying safer recruitment and selection procedures;
- assessing risks and establishing appropriate preventive measures for all activities;
- responding promptly and appropriately to concerns, disclosures and incidents;
- sharing information with families, partners and competent authorities when appropriate and necessary to protect a child or young person; and
- regularly monitoring and reviewing its safeguarding practices.

Sistema Cyprus's safeguarding framework includes:

- 3.1** Risk assessment for all activities and operations
- 3.2** Safer recruitment and guidelines for staff, Teaching Artists and volunteers
- 3.3** Safeguarding requirements in contracts, service delivery and partnerships
- 3.4** Safeguarding awareness, induction and training
- 3.5** Professional boundaries and mandatory Codes of Conduct
- 3.6** Procedures for reporting and responding to safeguarding concerns
- 3.7** Safeguarding commitments for visitors and associates
- 3.8** Safe use of photographs, videos and other participant information
- 3.9** Safeguarding procedures for outgoing and hosted international mobilities, as detailed in the relevant annexes to this policy.



### 3.1 Risk Assessment

Sistema Cyprus conducts documented risk assessments for its regular programmes and for specific activities that may present additional risks, including performances, workshops, trips, residential activities, online activities and international mobilities.

Before each activity, the responsible coordinator and a Designated Child Protection Person, with input from relevant staff and partners, will identify potential risks and determine appropriate preventive and response measures. The assessment will consider, as applicable:

- the activity, venue and equipment;
- participant age, support needs and accessibility;
- staffing, supervision and professional boundaries;
- travel, transport, accommodation and room arrangements;
- health conditions, medication, first aid and emergency procedures;
- bullying, discrimination, abuse and inappropriate behaviour;
- photography, digital communication and protection of personal information; and
- risks arising from external providers, visitors or partner organisations.

Each assessment will identify the risk, people who may be affected, existing safeguards, additional measures required, the responsible person and the date for completion. Activities will proceed only when the identified risks have been reduced to an acceptable level and the necessary arrangements are in place.

Relevant measures and emergency procedures will be communicated to staff, Teaching Artists, volunteers, partners, participants and families as appropriate. Staff will remain alert to changing circumstances during activities and will take immediate action if a new risk arises.

Risk assessments will be reviewed after an incident, significant change or participant feedback and following each major activity. Lessons identified will inform future planning. Additional requirements for outgoing and hosted international mobilities are set out in the relevant annexes to this policy.

### 3.2 Recruitment policy and guidelines for Sistema Cyprus Staff, Teachers and Volunteers

#### *a) Recruitment process*

Sistema Cyprus applies safer recruitment procedures to staff, Teaching Artists, volunteers and interns whose roles involve contact with children and young people. These procedures include:

- stating in recruitment information that Sistema Cyprus follows safer recruitment and child-protection practices;



- providing clear role descriptions that include safeguarding responsibilities;
- confirming applicants' identity, qualifications, relevant experience and suitability for the role;
- conducting interviews according to equal-opportunity principles, using questions based on the role description and required competences;
- discussing candidates' understanding of safeguarding, professional boundaries and their responsibility to report concerns;
- requesting references or other suitability checks appropriate to the role;
- examining and appropriately addressing any unexplained gaps or concerns arising during the recruitment process;
- requiring a Certificate of Clear Criminal Record issued by the Cyprus Police;
- requiring the certificate issued pursuant to Article 22(6) of the Prevention and Combating of Sexual Abuse and Sexual Exploitation of Children and Child Pornography Law, Law 91(I)/2014;
- making appointments conditional upon the satisfactory completion of all required checks; and
- providing safeguarding induction and requiring acceptance of the Child Protection Policy and Code of Conduct before the person begins unsupervised work with participants.

Only documents necessary to establish a person's identity, qualifications and suitability for the role will be requested. Criminal-record information and other personal or sensitive information will be accessed only by authorised persons, stored securely and processed in accordance with applicable privacy and data-protection requirements.

#### ***b) Guidelines for Sistema Cyprus Staff, teachers and Volunteers***

Sistema Cyprus staff, Teaching Artists, volunteers and interns must maintain safe, respectful and professional relationships with children and young people.

#### **Respect and inclusion**

They must:

- treat every child and young person with dignity, fairness and respect;
- listen to participants and take their views, feelings and concerns seriously;
- value each participant's identity, abilities and contribution;
- use inclusive and age-appropriate language;
- encourage participation without humiliation, intimidation or excessive pressure;
- challenge bullying, discrimination, harassment and inappropriate language; and
- respect participants' privacy while recognising that information may need to be shared when necessary for their protection.

#### **Professional conduct**

They must:



- act as positive role models and maintain appropriate professional boundaries;
- avoid favouritism, inappropriate gifts, secrecy or relationships that could create dependency;
- never use their position of trust for personal, financial, emotional or sexual advantage;
- communicate with participants through approved organisational channels and for legitimate programme purposes; and
- report any safeguarding concern, disclosure, allegation or breach of this policy promptly.

### **One-to-one contact**

One-to-one teaching or support may take place when educationally or pastorally necessary, provided that:

- it occurs in an observable or interruptible environment whenever possible;
- another responsible adult knows where and when it is taking place;
- doors remain open or rooms with visibility panels are used, where appropriate;
- unnecessary isolation from the group is avoided; and
- the adult records and reports any situation that causes concern.

### **Physical contact**

Physical contact must be appropriate, necessary, proportionate and responsive to the participant's needs. In instrumental teaching, a Teaching Artist must explain why physical guidance may be needed and seek the participant's agreement before making contact. Alternative verbal or visual guidance should be used whenever possible.

Staff, Teaching Artists and volunteers must never:

- engage in rough, sexually suggestive or inappropriate physical behaviour;
- use physical punishment or threatening conduct;
- initiate unnecessary or unwanted physical contact; or
- continue physical contact if a participant shows discomfort or asks them to stop.

All interactions must be open to professional scrutiny. Behaviour that could reasonably be misunderstood, cause discomfort or undermine trust must be avoided and, when relevant, reported to a Designated Child Protection Person.

### **3.3 Employment Agreements - Service delivery contracting and sub-contracting policy issues**

Employment agreements and service contracts for persons whose roles involve contact with children and young people will refer to this policy and the relevant Code of Conduct. Staff, Teaching Artists, volunteers, contractors and other service providers must confirm that they



have read, understood and agreed to comply with the safeguarding requirements relevant to their role.

A breach of this policy or the Code of Conduct will be assessed promptly and may result in precautionary measures, disciplinary action, suspension or termination of employment, engagement or contract, in accordance with the seriousness of the concern, applicable procedures and Cypriot law. Where appropriate, the matter may also be referred to the competent authorities.

Before entering into cooperation involving children or young people, Sistema Cyprus will assess whether the individual, service provider or partner organisation has suitable safeguarding practices and the capacity to fulfil its responsibilities. Agreements will clearly establish:

- the safeguarding standards that apply;
- the responsibilities of each party;
- the required conduct of personnel and volunteers;
- the procedure for reporting concerns and incidents;
- arrangements for supervision, information sharing and confidentiality; and
- responsibility for any subcontractors or external providers involved.

Partners and service providers must promptly inform Sistema Cyprus of any safeguarding concern connected with a joint activity. Sistema Cyprus may suspend or end cooperation when safeguarding requirements are not met or when continuing the cooperation could place a child or young person at risk.

Specific responsibilities for international mobilities will be agreed in writing with the relevant partner organisations and are further detailed in the international-mobility annexes to this policy.

### 3.4 Awareness of staff members, teachers, volunteers and partners

Sistema Cyprus will ensure that staff, Teaching Artists, volunteers and relevant partners understand their safeguarding responsibilities and are able to recognise, prevent and respond appropriately to concerns.

This will include:

- providing access to the Child Protection Policy and relevant Codes of Conduct;
- requiring confirmation that the documents have been read, understood and accepted;
- providing safeguarding induction before a person begins working directly with participants;
- explaining professional boundaries, safe working practices, reporting routes and the role of the Designated Child Protection Persons;



- providing guidance on responding appropriately when a child or young person raises a concern or makes a disclosure;
- raising awareness of the barriers that may make it more difficult for some participants to report concerns or access support;
- providing periodic refresher training and additional guidance when policies, legislation, identified risks or organisational activities change;
- providing activity-specific briefings before trips, residential activities and international mobilities; and
- keeping appropriate records of induction, training and confirmation of policy acceptance.

Partner organisations and external providers will receive safeguarding information proportionate to their role and must ensure that their personnel understand the procedures applicable to the joint activity.

Children, young people and families will receive accessible information about expected behaviour, their rights, available support and how to report a concern. Information will be adapted, translated or explained when necessary to support participants with different ages, languages or communication needs.

### 3.5 Professional boundaries and Code of Conduct

Clear professional boundaries are necessary to protect children and young people, maintain relationships based on trust and respect, and safeguard staff, Teaching Artists and volunteers from conduct that may be inappropriate or misunderstood.

All staff, Teaching Artists, volunteers, interns and relevant associates must comply with the **Code of Conduct for Staff, Teaching Artists and Volunteers** contained in Annex 1a. The Code establishes standards concerning respectful behaviour, professional relationships, one-to-one contact, physical contact, communication, confidentiality, images, conflicts of interest and the reporting of concerns. Individuals covered by the Code must confirm in writing that they have read, understood and agreed to follow it.

Annex 1b contains the **Code of Conduct for Participants**, which establishes expectations for respectful, inclusive and safe behaviour between children and young people. It addresses bullying, harassment, discrimination, violence, inappropriate language, damage to property and other conduct that may affect the safety or wellbeing of participants.

The Participant Code of Conduct will be shared and explained at the beginning of each programme year and before relevant trips, residential activities and international mobilities. It will be available in Greek and English and translated, adapted or explained where necessary according to participants' age, language and communication needs.



Breaches of either Code will be addressed promptly and proportionately. Any conduct that raises a safeguarding concern will be managed in accordance with the reporting and response procedures set out in this policy.

### 3.6 Process for the reporting of safeguarding issues and concerns

*See Annex 2 for the reporting process.*

Sistema Cyprus nominates the following two persons as main officers for safeguarding issues:

**1. Nikoletta Polydorou**

Designated Child Protection Person, [nikoletta@sistemacyprus.com](mailto:nikoletta@sistemacyprus.com)

**2. Myria Kkali**

Designated Child Protection Person, [myria@sistemacyprus.com](mailto:myria@sistemacyprus.com)

Any staff member, Teaching Artist, volunteer, intern, partner or associate who observes, receives or suspects a safeguarding concern must report it promptly to one of the Designated Child Protection Persons. The absence of complete information must not delay a report.

If a concern involves one of the Designated Child Protection Persons, it must be reported to the other. If both are implicated, unavailable or cannot be approached safely, the concern must be reported directly to the competent Social Welfare Services or the Police. If a child or young person is in immediate danger or requires urgent medical assistance, emergency services must be contacted without delay.

When a child or young person appears upset, injured or wishes to speak, the adult may use a simple, open prompt such as, “Would you like to tell me what happened?” The adult must listen calmly and must not investigate, ask leading questions, promise secrecy or require the participant to repeat their account unnecessarily. Any disclosure or relevant observation must be recorded accurately and reported according to this policy.

Children and young people will be informed that they can speak to a Teaching Artist, staff member, volunteer or Designated Child Protection Person whenever they feel unsafe, uncomfortable or concerned about themselves or another participant. Information identifying the available safeguarding contacts and external helplines will be displayed in programme locations and provided in accessible and age-appropriate formats.

For every trip, residential activity or international mobility, participants and accompanying persons will be informed before the activity who the designated safeguarding contact is and how that person can be reached. Additional reporting arrangements for outgoing and hosted mobilities are provided in the relevant annexes.



### *Awareness and response*

Sistema Cyprus staff, Teaching Artists, volunteers and relevant partners must remain alert to signs that a child or young person may be experiencing, or may be at risk of experiencing, abuse, exploitation, neglect, bullying or other harm. Concerns may relate to conduct within the family, community, Sistema Cyprus, a partner organisation, an activity or an online environment. Harm may be caused by an adult or by another child or young person.

Everyone covered by this policy must understand how to recognise possible indicators of harm and how to respond to a disclosure, observation, allegation or change in behaviour. They are not responsible for investigating or deciding whether abuse has occurred. Their responsibility is to listen, record relevant information and report the concern promptly in accordance with this policy.

Sistema Cyprus will normally seek to work openly with parents or carers when a concern arises. However, staff, Teaching Artists and volunteers must not contact parents or carers about a safeguarding concern on their own initiative. The Designated Child Protection Person will decide, where appropriate in consultation with the competent authorities, when and how parents or carers should be informed.

Parents or carers should not be contacted before professional advice is obtained when:

- sexual abuse or exploitation is suspected;
- organised, multiple or trafficking-related abuse is suspected;
- fabricated or induced illness is suspected;
- the parent or carer may be involved in the concern;
- informing them could interfere with an assessment or investigation; or
- contacting them could place the child, another participant, a staff member or any other person at increased risk.

The child or young person's immediate safety and best interests will guide all decisions about communication and further action.

### *Case Management: what to do if children talk to Sistema Cyprus staff, teachers and volunteers about abuse or neglect*

#### **Responding When a Child or Young Person Shares a Concern**

A child or young person may approach a staff member, Teaching Artist, volunteer or another trusted adult to share information about abuse, neglect, bullying, exploitation or another concern. A disclosure may also arise spontaneously during an individual or group activity.

In such situations, the adult must:

- listen calmly, carefully and without judgement;



- give the child or young person sufficient time and attention;
- allow them to explain what happened in their own words;
- use only open prompts when clarification is necessary and avoid leading or investigative questions;
- not interrupt, challenge, criticise or express disbelief;
- reassure them that they were right to speak and that what happened is not their fault;
- not promise secrecy, but explain that the information will be shared only with people who need to help keep them safe;
- explain, in an age-appropriate way, what will happen next;
- not ask them to repeat their account unnecessarily;
- make an accurate written record as soon as possible, including the date, time, setting, persons present, observations and the words used by the child or young person; and
- report the concern promptly to a Designated Child Protection Person using the form contained in Annex 3.

The adult receiving the disclosure must not investigate the matter or confront the person who is alleged to have caused harm.

### **Immediate Action and External Support**

Immediate action must be taken when necessary to protect a child or young person:

- If urgent medical attention is required, emergency medical services must be contacted or the participant taken safely to the nearest Accident and Emergency Department.
- If a child or young person is in immediate danger, the Police or other competent emergency service must be contacted without delay.
- If the concern involves one Designated Child Protection Person, it must be reported to the other.
- If both Designated Child Protection Persons are implicated, unavailable or cannot be approached safely, the concern must be reported directly to the competent Social Welfare Services or the Police.
- The absence of complete information or uncertainty about whether abuse has occurred must not delay consultation or action when a child or young person may be at risk.

Staff, Teaching Artists or volunteers may contact the competent Social Welfare Services or Police directly when urgent action is required, when a Designated Child Protection Person cannot be reached promptly or when internal reporting would be inappropriate or unsafe. Consultation may be sought to determine whether a formal referral is required.

### **Independent Helplines in Cyprus**

Children and young people may also seek confidential support from:



- **Hope for Children Helpline 1466:** free support for children and families, available 24 hours a day, seven days a week.
- **European Helpline for Children and Adolescents 116111:** free and confidential support for children and adolescents.

Current contact information and operating hours will be checked whenever the policy is reviewed and before being displayed or distributed to participants.

#### *Making a referral (see Annex 3 for template)*

See Annex 3 for the safeguarding concern and incident-report form.

A referral involves sharing relevant information with the competent Social Welfare Services, Police or another authorised body so that the concern can be assessed and appropriate protective action taken.

Referrals on behalf of Sistema Cyprus will normally be made by a Designated Child Protection Person. However, any person covered by this policy may contact the competent authorities directly when a child or young person is in immediate danger, when a Designated Child Protection Person cannot be reached promptly, or when internal reporting would be inappropriate or unsafe.

Parents or carers will normally be informed that a referral is being made. They must not be informed before professional advice is obtained when doing so could increase risk, compromise an assessment or investigation, or conflict with the child's best interests. The inability to inform a parent or carer must not prevent or delay a necessary referral. The timing and method of informing them may be agreed with the competent authorities.

As much of the following information as is available and relevant should be provided:

- the name, role and contact details of the person making the referral;
- the child or young person's name, date of birth, address and contact details;
- the names and contact details of parents or carers, where applicable;
- relevant information about the participant's language, communication, accessibility, medical or support needs;
- the names of relevant professionals or organisations already supporting the participant or family;
- a clear and factual description of the concern, including relevant dates, times, locations and persons involved;
- how the concern became known and whether there were any witnesses;
- the child or young person's own words, where available;
- any immediate action already taken;
- an assessment of whether urgent protection or medical attention may be required;
- whether the child or young person and their parent or carer have been informed;
- whether consent has been sought or provided, where relevant;



- who else has been consulted or informed; and
- any other information requested by the competent authority.

Missing information must not prevent or delay a referral.

An accurate record will be created and retained, including the original concern, decisions taken, reasons for those decisions, persons consulted, actions completed and any reference number provided by the competent authority. Records will be dated, stored securely, kept separately from general participant records and accessed only by authorised persons. Information will be shared strictly on a need-to-know basis and in accordance with safeguarding and applicable data-protection requirements.

### **Confidentiality**

Safeguarding information will be treated as confidential and shared only with persons who need the information to protect a child or young person, respond to a concern or fulfil a legal or professional responsibility.

No person covered by this policy may promise absolute confidentiality to a participant. When a concern is disclosed, the participant should be told, in clear and age-appropriate language, that relevant information may need to be shared with a Designated Child Protection Person or competent authority to help keep them or another person safe.

When deciding whether and how to share information, Sistema Cyprus will consider:

- the safety and best interests of the child or young person;
- the nature and seriousness of the concern;
- whether there is a risk of harm to the participant or another person;
- the purpose and necessity of sharing the information;
- who needs the information to take appropriate action; and
- applicable safeguarding, legal and data-protection requirements.

Only information that is relevant, accurate and necessary will be shared. Whenever appropriate and safe, the child or young person will be informed about what information will be shared, with whom and why. Their age, maturity, language, communication needs and understanding will be considered.

Safeguarding records will be stored securely, separately from general programme records, and accessed only by authorised persons. Concerns must not be discussed informally or shared with colleagues, families, partners or other persons who do not need the information.

Children and young people have a right to receive information that can increase their safety, including information about expected conduct, available support, reporting procedures and what may happen after they raise a concern.



The Child Protection Policy and relevant Codes of Conduct will be made available to staff, Teaching Artists, volunteers, participants, families, partners and visitors in a format appropriate to their role. Making the policy available does not permit access to confidential safeguarding records or information about individual cases.

### ***Internal Procedures – Legal measures***

When Sistema Cyprus becomes aware of an allegation, safeguarding concern or potential breach of this policy, it will take prompt and proportionate action to protect the child or young person and prevent further risk.

Depending on the circumstances, immediate protective measures may include:

- removing or restricting the individual's contact with participants;
- changing duties, supervision or access arrangements;
- temporarily suspending the individual from activities or responsibilities;
- preserving relevant records and information;
- providing support to the child or young person and other persons affected; and
- referring the matter to the competent Social Welfare Services, Police or another authorised body.

Precautionary measures do not constitute a finding of wrongdoing. They are taken to protect participants and preserve the integrity of any assessment or investigation.

Sistema Cyprus will not conduct an internal investigation in a way that could interfere with a criminal, social-welfare or other statutory investigation. It will seek direction from the competent authorities and legal advice where necessary before undertaking internal fact-finding or disciplinary procedures.

A substantiated breach may result in disciplinary action, changes to duties, suspension, termination of employment or engagement, ending a contractual or partnership relationship, or referral to the competent authorities. All decisions will be documented and taken in accordance with the circumstances of the case, applicable contracts, internal procedures and Cypriot law. Information will be restricted to persons who need it for safeguarding, decision-making or legal purposes.

### **3.7 Commitment to the policy by visitors and confirmation of awareness**

Sponsors, contractors, suppliers, donors, journalists, consultants, guests and other visitors who may come into contact or interact with children and young people through Sistema Cyprus activities will:

- receive appropriate information about this policy and the safeguarding requirements relevant to their visit or role;



- comply with the instructions of Sistema Cyprus staff and remain appropriately supervised;
- follow the relevant Code of Conduct while participating in or visiting Sistema Cyprus activities; and
- confirm in writing their commitment to comply with the policy and Code of Conduct when the nature or duration of their contact with participants requires it.

Visitors who have not completed the required safeguarding checks must not be given unsupervised access to children or young people. Sistema Cyprus may restrict or end a visit if safeguarding instructions are not followed.

### 3.8 Regulation of use of images and videos by visitors and external persons

Visitors and external persons may not photograph, record, publish or otherwise use images, video, audio recordings or personal stories involving children and young people without prior authorisation from Sistema Cyprus and the appropriate consent.

Where a participant is under 18, written consent must normally be obtained from their parent or legal guardian, together with the child's agreement according to their age and understanding. Participants aged 18 or above must provide their own informed consent. A participant's decision not to be photographed or recorded must always be respected and must not affect their participation.

Authorised material must:

- portray participants with dignity and respect;
- not place a participant or their family at risk;
- not reveal sensitive or unnecessary identifying information;
- comply with applicable privacy and data-protection requirements;
- not be sexualised, degrading, discriminatory or capable of harmful misinterpretation; and
- be used only for the purpose and channels for which consent was obtained.

Visitors and external persons must not use personal devices to take or retain unauthorised images or recordings, post material on personal social-media accounts, or share it with third parties.

Images, recordings or stories involving participants may not be used for journalistic, fundraising, advertising or commercial purposes by an external person or organisation without written authorisation from Sistema Cyprus and the required participant or parental consent.

Sistema Cyprus may require the removal or deletion of any material that breaches this policy or places a participant at risk. Additional requirements for journalists, photographers and media professionals are contained in the Code of Conduct for Media.



### 3.9 Safeguarding in International Mobilities

This policy applies to all international mobility activities organised, hosted or attended by Sistema Cyprus, including youth exchanges, group activities, training activities, study visits, job shadowing and other activities involving young people, youth workers, staff, Teaching Artists or volunteers.

Before each mobility, Sistema Cyprus and the partner organisation will agree in writing:

- the safeguarding and duty-of-care responsibilities of each organisation;
- the designated safeguarding and emergency contacts;
- participant supervision and accompanying-person arrangements;
- procedures for reporting and responding to concerns or incidents;
- arrangements for sharing necessary participant information securely; and
- responsibility for travel, accommodation, local transport, activities and free time.

A documented risk assessment will be completed before each mobility. It will consider travel, venues, accommodation, room allocation, participant age and support needs, accessibility, health and medication, first aid, supervision, transport, online communication, photographs, emergency procedures and the local context.

Participants will receive accessible information before the activity about expected behaviour, professional boundaries, safety arrangements, emergency contacts and how to seek help or report a concern. Parents or legal guardians of participants under 18 will receive relevant information and provide the required consent. Participants aged 18 or above will provide their own informed consent and will receive appropriate support and duty of care.

Each mobility involving young people will have designated safeguarding contacts and appropriately prepared accompanying persons. Where possible, at least one accompanying person or responsible team member will have current first-aid training. Sistema Cyprus will ensure that participants are able to contact a responsible adult and obtain assistance throughout the activity.

When hosting in Cyprus, Sistema Cyprus will provide visiting organisations and participants with its safeguarding requirements and local reporting procedures before arrival. When sending participants abroad, Sistema Cyprus will review the host organisation's safeguarding arrangements before confirming participation.

Any concern or incident arising during a mobility will be recorded, reported and addressed according to this policy, the applicable procedures of the host country and the written arrangements agreed with the partner organisation. Immediate safety will take priority, and the competent authorities will be contacted whenever required.

Detailed procedures are contained in:

- **Annex 5A – Safeguarding Procedures for Outgoing International Mobilities**



- **Annex 5B – Safeguarding Procedures for International Mobilities Hosted by Sistema Cyprus**

### **3. MONITORING AND EVALUATION**

Sistema Cyprus will monitor the implementation and effectiveness of this policy on an ongoing basis. The Designated Child Protection Persons will oversee its application and identify any actions required to strengthen safeguarding practice.

Monitoring will consider:

- safeguarding concerns, incidents and responses;
- whether reporting and referral procedures were followed;
- feedback from children, young people, families, staff, Teaching Artists, volunteers and partners;
- compliance with safer recruitment, induction and training requirements;
- risk assessments and lessons identified from programmes, trips and international mobilities;
- breaches of the Codes of Conduct and the action taken;
- the accessibility and effectiveness of information and reporting routes; and
- changes in organisational activities, legislation or recognised safeguarding practice.

Safeguarding information will be reviewed without unnecessarily disclosing the identities of the persons involved. Lessons identified will be used to improve procedures, training, risk assessments and participant support.

This policy will undergo a formal review at least every two years. An earlier review will take place following a serious incident, a significant organisational or legislative change, the identification of a new risk, feedback indicating that existing procedures are insufficient, or changes to relevant national, European or programme requirements.

Revisions will be documented and approved by Sistema Cyprus management. Updated versions will state the date of approval and next scheduled review and will be communicated to staff, Teaching Artists, volunteers and relevant partners. Updated information will also be provided to children, young people and families where the changes affect their rights, responsibilities or available support.

### **4. LIST OF DOCUMENTS ANNEXED**

**Annex 1A:** Code of Conduct for Staff, Teaching Artists and Volunteers

**Annex 1B:** Code of Conduct for Participants

**Annex 2:** Safeguarding Reporting Process – Flowchart Report



**Annex 3:** Incident Report Form

**Annex 4:** Code of Conduct for Media

**Annex 5A:** Safeguarding Procedures for Outgoing International Mobilities

**Annex 5B:** Safeguarding Procedures for International Mobilities Hosted by Sistema Cyprus



## **Annex 1: CODE OF CONDUCT**

### **For Staff, Teachers and Volunteers**

The following boundaries and rules apply to and bind all directors, administrators, consultants, designated staff (permanent staff, contractors, teachers external partners) and volunteers. This code dictates our duty to never ignore – or omit to report – any concern, suspected violation or violation of the current safeguarding policy principles and arrangements:

- Treat every child and youth equally and respectfully, without any form of discrimination, racist, xenophobic behaviour and approaching them with positive, friendly, and non-violent ways. This behaviour should be regardless of personal and cultural identity and in line with the principles stated in the current policy.
- Respect children's and young adults' right to be heard and to participate in the procedures and decisions that concern them, inform, encourage and empower them towards the claiming and realisation of their rights.
- Respect the principles of trust, confidentiality and personal data protection. In conjunction with these principles, a safe information-sharing process among the competent involved professionals/stakeholders shall be followed. It is noted that any information, data, photo concerning the beneficiary's personality and story shall be published only with his/her explicitly given permission, and provided that he/she is not exposed to any danger or risk of stigmatisation.  
Special care shall be taken concerning children's cases (see below).
- It is prohibited to:
  - Develop personal relationships between a member of staff (paid or unpaid) and a beneficiary who is a current service user
  - Pass on service users' personal contact details, unless previously agreed
  - Use of abusive language or response to inappropriate behaviour/language and the use of punishment or chastisement, or any abusive behaviour
  - Behave in a disrespectful way (for example using disrespectful vocabulary or a bad manner toward anybody, etc.) and work under the influence of drugs or alcohol. It is reminded that staff (paid and non-paid) and volunteers must behave with modesty and dignity and serve as role-models of behaviour for children and youth.
  - Watch, publish, produce, or show violent, explicit, inappropriate or pornographic material to children at all times, during and outside work



- Especially with regards to children, it must be ensured that:
  - A child/young adult is never to be used as an interpreter in any processes and responsibilities (such as interview, social history etc.)
  - A child/young adult is never to be fondled, held, hugged, kissed or touched in an improper way, and always taking into account what the child believes is improper (based on their cultural, ethnical, religious background and gender)
  - No collaboration of any kind that operates against the best interest of the child should be engaged with private actors in any way
  - No child should ever be exploited for labour (e.g. through domestic work)
  - No stories or images which may endanger a child, their family or community are published
  - No money is ever to be given directly to children, nor should other people or parties ever be encouraged to give money to children. This is especially significant for minors in vulnerable situations such as victims of exploitation, unaccompanied minors, victims of trafficking and children experiencing homelessness
  - No information or image of the children should ever be used without the written permission by children's parents/guardians, nor should it be used without taking the children's will and opinion into account.
  - Children should never be coerced or forced into any kind of public exposure. Any information or photo concerning a child's story, experience or background should in no way expose them to any danger or to any risk of stigmatisation
- Every member of the staff (paid and non-paid) is additionally bound to the principles and rules of his/her professional code of conduct; the latter code is the one that is formally and legally approved by each relevant professional union, in accordance with the Cypriot legal framework.
- If a case of conflict of interests arises, the person in concern shall refer and discuss it with the designated officer for safeguarding issues of Sistema Cyprus.
- The Sistema Cyprus code of conduct is in line with the following articles from the IASC Six Core Principles Relating to Sexual Exploitation and Abuse:
  - Sexual exploitation and abuse by humanitarian workers constitute acts of gross misconduct and are therefore grounds for termination of employment.
  - Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defence.
  - Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited. This includes exchange of assistance that is due to beneficiaries.
  - Any sexual relationship between those providing humanitarian assistance and protection and a person benefiting from such humanitarian assistance and protection that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of humanitarian aid work.



- Where a humanitarian worker develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, he or she must report such concerns via established agency reporting mechanisms.
  - Humanitarian workers are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of their code of conduct. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.”
- All directors, administrators, consultants, designated staff (permanent staff, teachers, contractors, external partners) and volunteers are obligated to present the organization’s administration the following documents, issued by the local police authorities.
    5. Certificate of Clear Criminal Record
    6. Original Certificate by the Police in accordance with article 22 (6) of the "Prevention and Combating of Sexual Abuse and Sexual Exploitation of Children and Child Pornography Law, N. 91 (i)/2014".

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\*\*\*\*\*

I hereby declare that I have read and understood this code of conduct and I commit to work in accordance with it. I am aware that breaching this code may result in the termination of my engagement with Sistema Cyprus and/or further disciplinary or judicial proceedings, as mentioned above.

Signature: \_\_\_\_\_

Name and Surname: \_\_\_\_\_

Place: \_\_\_\_\_

Date: \_\_\_\_\_



## **Annex 2: CODE OF CONDUCT**

### **For Participants**

#### **1. Welcome!**

Dear Students of Sistema Cyprus

We so look forward to welcome you Sistema Cyprus this year! **Please read this document carefully with your parent or guardian before your first lesson**, and if you or your parent/guardian has any questions, please do not hesitate to contact us at 99902552.

#### **1. Rules for promising**

- Students must come to class at least ten minutes before the beginning of their lesson in order to prepare for it and so that class time is not lost.
- Students must study the music pieces that their teachers ask for and follow their instructions.
- Students must take care of the musical instruments that they have been given on loan and protect them from being damaged by following all necessary steps for their daily maintenance.
- Sistema students respect everyone!

#### **2. Sistema Cyprus' Behaviour Expectations**

At Sistema Cyprus all participants are asked:

- To role model true Youth Ownership in music making and social activities
- To embody the spirit of Sistema by bringing passion and energy
- To help and include others
- To listen when others are talking or presenting
- To use their initiative and be proactive
- To arrive to their sessions on time
- To be personally responsible for their own behaviour
- To treat all others with respect and kindness
- To take care of all buildings and property, including personal possessions and instruments.
- To fulfil all Sistema Cyprus commitments positively and with good energy!

#### **3. Bullying**

The following behaviours are strictly forbidden at all times and will not be tolerated:

7. Bullying - this includes persistent teasing, which can quickly become bullying.
8. Harassment or discrimination for any reason including those on grounds of gender, race, religion, disability etc.
9. Theft or borrowing another student's possessions without permission.
10. Using offensive language or words to injure, insult or alienate anyone.
11. Using physical violence of any form and in any context.
12. Deliberately isolating someone or refusing to talk to them.



If you are concerned about your own or anyone's wellbeing or behaviour at Sistema Cyprus, whether a student or member of staff, please tell your Teacher, or any Sistema Cyprus staff. We will listen to you, and we will keep information as confidential as possible. As soon as you tell an authorised adult, we will manage it. It is not your responsibility and you do not have to solve the problem yourself.

If for any reason you don't feel comfortable to talk to your teachers or any staff member you can:

- Call Hope for Children CRC Policy Center at **116 111**. The 116 111 helpline gives you the opportunity to talk about anything that is bothering you, anything that made you uncomfortable or made you feel bad. You can call for free from a landline or mobile phone from anywhere in Cyprus. The days and times you can call are **Monday to Friday from 12:00 noon to 8:00 pm and every Saturday from 9:30 am to 2:00 pm.**

On 116 111 there is someone who really cares about what is on your mind. You can call **anonymously**. 116 111 is based on the principles of confidentiality and discretion. The advisers will only act if they feel there is an urgent need and after discussing it with you.

- To visit the Hope for Children CRC Policy Centre **website** <https://www.uncrcpc.org.cy/> and write to **Chat** about anything that concerns you.
- To call for **free** and **anonymously** to **1466** toy Hope for Children CRC Policy Center. The line is 24 hours a day.



|                                                                                                                                                                                                                    |                                           |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------|
| <b>Annex 3: Child Protection Incident Report Form -Sistema Cyprus</b><br>Email this form to <a href="mailto:nikoletta@sistemacyprus.com">nikoletta@sistemacyprus.com</a>                                           |                                           |
| Date of Report:                                                                                                                                                                                                    |                                           |
| <b>Reported by:</b>                                                                                                                                                                                                |                                           |
| Your name:                                                                                                                                                                                                         | Your position:                            |
| Your phone number(s):                                                                                                                                                                                              | Your email address:                       |
| <b>Person being protected (the minor)</b>                                                                                                                                                                          |                                           |
| Family Name:                                                                                                                                                                                                       | First Name:                               |
| Date of Birth and Nationality:                                                                                                                                                                                     | Gender:                                   |
| Address and Contact Details:                                                                                                                                                                                       |                                           |
| Who does the child live with?                                                                                                                                                                                      | Are any other children involved?          |
| <b>Person who caused the problem (the offender)</b>                                                                                                                                                                |                                           |
| Family Name:                                                                                                                                                                                                       | First Name:                               |
| Age and Gender                                                                                                                                                                                                     | Nationality:                              |
| Address and contact details:                                                                                                                                                                                       | Does this person work for Sistema Cyprus? |
| What is this person's relationship with the child?                                                                                                                                                                 |                                           |
| If there are two or more people who caused the problem, please add details at the end of this report                                                                                                               |                                           |
| <b>Facts (details of the incident/report)</b>                                                                                                                                                                      |                                           |
| Date and time of the incident:                                                                                                                                                                                     | Location of the incident                  |
| How did you become aware of the incident?<br><input type="checkbox"/> I witnessed it <input type="checkbox"/> Other staff told me <input type="checkbox"/> Victim told me <input type="checkbox"/> Other (specify) |                                           |
| Were there any other witnesses to the incident? <input type="checkbox"/> Yes <input type="checkbox"/> No<br>If yes, please provide name, position and contact details:                                             |                                           |
| Please describe the specific child abuse incident:                                                                                                                                                                 |                                           |
| <b>Protection</b>                                                                                                                                                                                                  |                                           |
| What immediate action has been taken to protect the child?                                                                                                                                                         |                                           |



## **Annex 4: CODE OF CONDUCT FOR MEDIA**

### **Sistema Cyprus: Guidelines and recommendations for journalists, reporters and photographers**

Sistema Cyprus welcomes and supports new organisations reporting on its work in Cyprus and abroad, since it makes an important contribution to obtaining our goal of enforcing and protecting children's rights worldwide. The utmost priority in every activity is the welfare, protection and safety of the children and young adults we work with. In order to ensure that these values are respected in your reports, we kindly ask that you adhere to our guidelines and rules for project visits and communication standards and sign them. We operate under the assumption that your work will abide by [global media ethics guidelines](#). Our own communications standards serve as an ethical compass for the particular challenges posed by reporting on issues affecting children and youth, some of whom live in difficult contexts.

To help you find the most successful approach to your work, we also have some practical recommendations for you.

#### **1. General guidelines for Sistema Cyprus visits**

You are a guest and a visitor to the project and not a Sistema Cyprus delegate. Accordingly, we kindly request that you refrain from getting involved in project matters and avoid conflicts or complaints with project staff. You should also refuse any request for money as a rule.

Please observe project rules during your visit. Comply with local employees' requests. We are happy to address any critical experiences or observations with you once you get back.

The visit should be tailored to the children's general day-to-day routine, so that it is not a disruption for the rest of the community.

Please refrain from smoking or consuming alcoholic drinks while on project premises or in the presence of children.

When visiting our projects, or families of children, you should comply with local social customs. It is best to ask project employees about these customs before you go.

Respect the children's religious beliefs and refrain from attempting to influence them at all.

When in contact with children, you must be within eyesight of a project employee/guardian at all times, or within earshot.

We ask this not only for reasons relating to the project partners' liability, but also for your own protection: activities outside the project (e.g. field trips with only one child) could give rise to unpleasant suspicion, even if these concerns prove to be unfounded.

If you wish to take a picture of anyone, particularly children, during your project visit, you may do so only after first obtaining permission from the Board of Sistema Cyprus.

We request that your clothing is appropriate for the cultural habits of the people you are visiting and that you avoid drawing any extra attention to your personal wealth by what you



wear (such as expensive jewellery) or by spending conspicuous amounts of money in the presence of our children and their families.

## **2. Communication standards**

All media content rests on the values of respect and equality and preserves the dignity of the people described. Portray the children as multi-faceted individuals with a diverse range of potentials, and refrain from reducing them to victims or other stereotypical roles.

We already have the written agreement for some of the children in our programmes to be photographed and filmed for the purposes of documenting and promoting Sistema Cyprus through authorised social media channels of Sistema Cyprus or Sistema Europe like YouTube, Facebook or Twitter and via other media. However, in order to take any interview, photograph, video of Sistema Cyprus's beneficiaries, you may do so only after first obtaining permission from the Board of Sistema Cyprus. Sistema Cyprus staff will inform the children and their parents/guardians about the purpose of the interviews/photography.

The privacy of all the people involved in the project or its environment must be maintained at all times. Be careful before stating the child's name and make sure his or her express consent has been confirmed; otherwise, use pseudonyms.

Children must be adequately (in the context of their country) dressed. You need to be particularly cautious when taking and selecting pictures in which children do not wear much clothing. When describing the children's living situations, you must account for the social, cultural and economic context in order to demonstrate the complexity of the development situation.

### **Communication measures to protect children who are particularly at risk**

Public media coverage of children who are especially at risk must include additional protective measures as these children could be put at greater risk of violence or stigmatisation. In our particular working context, children at risk include, among others:

- Asylum seekers, refugees or internally displaced persons
- Traumatized children (after natural catastrophes, armed conflicts, etc.)

In such cases, the reporter needs to work with Sistema Cyprus staff to assess the risk associated with the planned media content and its publication and adapt the description to the following scale:

**Risk level 1:** Low risk of violence or stigmatisation

Faces and information about the location can be published.

**Risk level 2:** Mid-level risk of violence or stigmatisation

Faces and information about the approximate location can be published.

**Risk level 3:** High risk of violence or stigmatisation

Any published faces may not be clearly identifiable, location information must be changed.



Where children are categorised in the risk scale depends on multiple factors that need to be determined on a case-by-case basis. One factor, for example, is the child's immediate environment. Please, always discuss these issues with Sistema Cyprus staff.

## **Recommendations for successful reporting.**

### *Preparing for a visit of Sistema Cyprus activities and premises*

Sistema Cyprus coordinates locations and dates for project visits before journalists visit the project; we are also happy to support and research potential interviewees with editors. When you are on location, please clarify the scope and purpose of your visit with the children and their parents/guardians. Particularly in delicate situations, it is important that children and their families know what will happen with what you write. Your duty to disclose information also requires you to inform them of their right to their own image.

## **Working on location**

### General

Have a conversation with Sistema Cyprus staff about the particular challenges relating to child protection and explain to them why you want to report on your topic, for whom you are doing it and how you will go about it. They will make sure that children and their families are also informed.

Together with Sistema Cyprus staff, find or make a space where the child feels safe and at ease.

Visit the project with compact equipment.

Be mindful of the cultural conventions at play and treat everyone involved with respect.

Allow plenty of time.

Over the course of the conversation or throughout filming, be aware of the background and environment that you are using for your report and ensure that the child cannot be identified or put at risk because of the background.

### Interviewing children

Find an appropriate and child-friendly way to start the conversation in order to break the ice, such as use of the child's native language and simple words.

Take care to ensure that the child feels at ease throughout the conversation and trusts you. Also keep in mind the trusted role of any interpreter that might be needed.



The number of reporters and photographers should be kept to a minimum during the conversation, so that the child can speak without pressure or fear. Here, too, the role of a potential interpreter may be key.

Be mindful of the child's age and adapt your language and questions accordingly.

Avoid direct questions that conjure up psychological pain or a traumatic experience; talk to Sistema Cyprus staff about what the child can cope with.

Please be aware that children often express themselves in other ways than language, such as drawings.

### Photographing and filming children

Allow plenty of production time for the children and create a comfortable and child-friendly atmosphere.

Please observe the child's reaction and speak with him or her while production is under way.

If clip-on microphones are being used, it is important to be especially careful. A person the child trusts should put on and remove the microphone.

End the session after an appropriate period and thank the child.

## **Using material gathered during your visit**

### Creation

Please portray the children as multidimensional individuals who overcome their situation with tremendous strength, perseverance and creativity – and never as objects of our charity. Even when day-to-day life is plagued with extreme poverty and violence, it is not uncommon for children to remain individuals with hopes and dreams. Refrain from reducing children to victims or stigmatising them. Ultimately, development can only occur when other perspectives are relayed.

### Publication

Please bear in mind that once information has been made public, it is very difficult to take back. We request that you be aware of the publication channels: a lot of print and TV content ends up republished verbatim on the internet, and so can also be accessed in partner projects. Please also do not put Sistema Cyprus partners at risk and do not obstruct project work by disclosing confidential (background) information publicly.

### Availability

Please flag your content as locked/limited permission used to ensure that archived information and pictures which are restricted from publication are protected accordingly. If you do not have any direct control over archiving or cannot reach archive employees on a regular basis for queries, please redact the pictures or certain picture areas yourself.



## **Annex 5a: SAFEGUARDING PROCEDURES FOR OUTGOING INTERNATIONAL MOBILITIES**

### **1. Purpose and Scope**

This annex forms part of the Sistema Cyprus Child Protection Policy. It applies whenever Sistema Cyprus sends children, young people, youth workers, staff, Teaching Artists or volunteers to an activity outside Cyprus.

It covers youth exchanges, group mobility activities, training, study visits, job shadowing, performances and other international activities. Its purpose is to ensure that safeguarding and duty-of-care responsibilities are clearly defined before, during and after each mobility.

The Child Protection Policy applies in full whenever an activity involves participants under 18 or interaction with children through the host organisation.

### **2. Responsibilities**

For every outgoing mobility, Sistema Cyprus will designate:

- a Mobility Coordinator responsible for planning and practical arrangements;
- a Designated Child Protection Person responsible for safeguarding oversight;
- an accompanying-person team appropriate to the number, age and support needs of participants;
- a lead accompanying person responsible for the group during travel and the activity; and
- where possible, at least one accompanying person with current first-aid training.

Participants and families will receive the names and contact details of the responsible persons before departure.

The accompanying team will have access to the information required to support participants safely, while respecting confidentiality and data-protection requirements.

### **3. Assessment of the Host Organisation**

Before confirming the mobility, Sistema Cyprus will assess the host organisation's ability to provide a safe activity. This will include reviewing:

- its safeguarding or child-protection arrangements;
- its reporting and emergency procedures;
- the identity and role of its safeguarding contact;



- staff supervision and professional-boundary arrangements;
- accommodation, meals, venues and local transport;
- accessibility and capacity to meet participants' support needs;
- insurance and emergency-health arrangements; and
- the relevant legal and cultural context of the host country.

Safeguarding responsibilities, emergency contacts and incident-reporting procedures will be agreed in writing. Sistema Cyprus may postpone, modify or cancel participation if adequate safeguards cannot be confirmed.

## **4. Participant Selection and Individual Support**

Participants will be selected through a fair, transparent and inclusive process. Selection will not discriminate on the basis of disability, gender, gender identity, sexual orientation, nationality, ethnicity, religion, migration or residence status, language, socioeconomic circumstances or any other characteristic.

Sistema Cyprus will identify any support required to enable safe and meaningful participation. Relevant information may include:

- health conditions, allergies and medication;
- disability, accessibility or communication requirements;
- dietary or religious requirements;
- emotional, behavioural or wellbeing considerations;
- documentation, residence-permit or visa requirements;
- previous travel experience; and
- any other circumstance that may affect participation or safety.

Only information necessary for participant safety and support will be collected and shared. Additional support measures will be agreed with the participant, family and host organisation as appropriate.

## **5. Consent and Documentation**

Before departure, Sistema Cyprus will obtain and verify, as applicable:

- informed participant consent;
- written parental or legal-guardian consent for participants under 18;
- emergency contact information;
- relevant medical and support information;
- consent concerning emergency medical treatment;
- photography and media consent;
- passport, residence-permit and visa documentation;
- travel and medical insurance; and



- any documents required by the host country or activity.

Parents or guardians will receive clear information about the programme, travel, accommodation, supervision, free time, communication, emergency procedures and contact persons.

Families will not be required to advance mobility costs where doing so would create a barrier to participation.

## 6. Preparation

All participants will receive age-appropriate preparation covering:

- the purpose and programme of the mobility;
- travel arrangements and documentation;
- accommodation and rooming arrangements;
- expected behaviour and the Participant Code of Conduct;
- safeguarding contacts and reporting routes;
- health, safety and emergency procedures;
- responsible use of phones, social media, photographs and messaging;
- cultural awareness and respect for local communities;
- agreed arrangements for free time and leaving the group;
- alcohol, smoking, drugs and prohibited behaviour; and
- how to seek support for themselves or another participant.

Accompanying persons will receive a briefing on the risk assessment, individual support arrangements, professional boundaries, supervision, first aid, emergencies, incident recording and communication with families and partners.

## 7. Travel, Accommodation and Supervision

Travel, accommodation and local transport will be assessed before booking. Sistema Cyprus will verify location, accessibility, room arrangements, emergency exits, distance from activity venues and relevant cancellation conditions.

Participants under 18 will not share bedrooms with unrelated adults. Accompanying persons will not enter a minor's bedroom alone except in an emergency or when necessary to protect a participant. Wherever possible, another responsible adult will be present or informed.

Room allocations will respect participants' age, privacy, dignity, safety and individual needs. Any sensitive rooming requirement will be discussed confidentially with the participant and, where applicable, their parent or guardian.

Supervision levels will be determined through the risk assessment, taking account of participants' age, maturity, needs, the activity and the local environment. Accompanying persons will:



- carry out agreed headcounts and check-ins;
- know participants' whereabouts during organised activities;
- establish clear meeting points and return times;
- ensure that participants can contact a responsible adult;
- apply the agreed free-time arrangements; and
- avoid being alone with a participant under 18 in a private or unobservable setting.

## **8. Health, First Aid and Emergencies**

Sistema Cyprus will ensure that participants have appropriate travel and medical insurance. European Health Insurance Cards will be requested where applicable, but will not replace additional insurance where this is required.

Relevant medical and emergency information will be available securely to authorised accompanying persons. Medication arrangements will be agreed in advance with the participant and, for minors, their parent or guardian.

The accompanying team will know how to access local medical care and emergency services. A written emergency plan will address serious illness or injury, missing participants, safeguarding incidents, major travel disruption and the need for emergency return.

If a participant becomes missing, the lead accompanying person will immediately assess the circumstances, contact the host organisation and follow the agreed emergency procedure. Local police, emergency services, Sistema Cyprus and the participant's parent or emergency contact will be informed as appropriate.

## **9. Conduct and Professional Boundaries**

The Sistema Cyprus Child Protection Policy and relevant Codes of Conduct remain applicable throughout the mobility, including during travel, accommodation, meals, free time and online communication.

Accompanying persons must not:

- share bedrooms with unrelated participants under 18;
- develop inappropriate personal, romantic, sexual or exploitative relationships with participants;
- provide alcohol, tobacco or prohibited substances to minors;
- communicate secretly or through inappropriate private channels;
- use humiliating, threatening or discriminatory behaviour; or
- take or share unauthorised photographs, recordings or personal information.

Any concern about the conduct of a participant, accompanying person, host representative or external provider must be reported.



## **10. Reporting and Responding to Concerns**

Before departure, Sistema Cyprus and the host organisation will agree how concerns will be reported and which organisation will lead the immediate response.

A participant may report a concern to any accompanying person, the lead accompanying person, the host safeguarding contact or a Sistema Cyprus Designated Child Protection Person.

The person receiving a concern must:

- prioritise the participant's immediate safety;
- listen without investigating or asking leading questions;
- contact emergency services where necessary;
- inform the designated safeguarding contacts promptly;
- make an accurate factual record; and
- preserve confidentiality by sharing information only with those who need it.

Where a concern arises abroad, Sistema Cyprus will cooperate with the host organisation and the competent authorities in the host country. The competent authorities in Cyprus and the participant's parent or guardian will also be informed when appropriate.

If the concern relates to an accompanying person, that individual may be removed from contact with participants while protective action and further advice are considered.

## **11. Follow-up and Review**

Following the mobility, Sistema Cyprus will:

- offer participants an opportunity to raise concerns privately;
- follow up any health, wellbeing or safeguarding needs;
- record incidents, actions and outstanding responsibilities;
- obtain feedback from participants, families, accompanying persons and the host;
- review the effectiveness of safeguarding and logistical arrangements; and
- incorporate lessons into future risk assessments, preparation and mobility procedures.

Safeguarding records will be stored securely and separately from general mobility documentation. Access will be restricted to authorised persons.



## **ANNEX 5B: SAFEGUARDING PROCEDURES FOR INTERNATIONAL MOBILITIES HOSTED BY SISTEMA CYPRUS**

### **1. Purpose and Scope**

This annex forms part of the Sistema Cyprus Child Protection Policy. It applies whenever Sistema Cyprus hosts children, young people, youth workers, staff, Teaching Artists or volunteers from another country.

It covers youth exchanges, group activities, training, study visits, job shadowing, performances and other international activities hosted in Cyprus. Its purpose is to ensure that Sistema Cyprus and each sending organisation understand and fulfil their safeguarding and duty-of-care responsibilities.

The Child Protection Policy applies in full whenever an activity involves participants under 18 or brings visiting participants or professionals into contact with children in Sistema Cyprus programmes.

### **2. Responsibilities**

For every hosted mobility, Sistema Cyprus will designate:

- a Mobility Coordinator responsible for planning and logistics;
- a Designated Child Protection Person responsible for safeguarding oversight;
- a named local safeguarding contact available during the activity;
- a named emergency contact; and
- where possible, at least one responsible team member with current first-aid training.

Each sending organisation must appoint:

- a group leader or responsible contact;
- an accompanying-person team appropriate to its participants;
- a safeguarding contact; and
- an emergency contact in the sending country.

Responsibilities for supervision, accommodation, transport, activities, free time, medical support, communication with families and incident response will be agreed in writing before arrival.

### **3. Assessment of Sending Organisations and Providers**

Before confirming participation, Sistema Cyprus will request relevant information about each sending organisation's:

- safeguarding or child-protection procedures;
- participant-selection and preparation arrangements;



- accompanying persons and supervision;
- emergency and incident-reporting procedures;
- insurance arrangements; and
- ability to identify and communicate participants' individual support needs.

Sistema Cyprus will also assess accommodation providers, transport providers, venues and other external services used during the mobility. Providers must meet appropriate safety, accessibility and safeguarding requirements.

Sistema Cyprus may request changes, additional safeguards or supporting information before participation is confirmed.

## **4. Information Required Before Arrival**

Each sending organisation will provide, within an agreed and secure process:

- an accurate participant and accompanying-person list;
- participants' ages and dates of birth;
- parental or legal-guardian consent for participants under 18;
- emergency contact details;
- relevant health, allergy, medication and dietary information;
- disability, accessibility, communication or other support requirements;
- insurance information;
- travel and arrival details;
- rooming information and any relevant safety considerations;
- photography and media permissions; and
- information about any circumstance necessary for safe participation.

Information will be limited to what is necessary and shared only with authorised persons responsible for participant safety and support.

The sending organisation remains responsible for ensuring that the information and consent it provides are accurate and current.

## **5. Pre-arrival Information**

Before arrival, Sistema Cyprus will provide participants, families and sending organisations with:

- the activity programme and learning objectives;
- accommodation and meal arrangements;
- arrival, departure and local-transport information;
- supervision and free-time arrangements;
- local safeguarding and emergency contacts;
- information on how to report a concern;



- relevant health and safety information;
- expectations concerning behaviour, alcohol, smoking and prohibited substances;
- photography, filming and social-media arrangements;
- accessibility information; and
- relevant information about Cyprus and the local community.

Information will be written in clear language and explained or translated where necessary.

## **6. Arrival and Safeguarding Induction**

At the beginning of the mobility, Sistema Cyprus will provide an induction covering:

- the names and roles of the local support and safeguarding contacts;
- expected behaviour and professional boundaries;
- emergency numbers and procedures;
- venue and accommodation safety;
- supervision, meeting points, check-ins and free-time arrangements;
- procedures for illness, injury or medication;
- respectful and inclusive communication;
- photography, online communication and social-media use; and
- how to raise a concern privately.

Participants will be reminded that they may report a concern to their group leader, any trusted accompanying person, the Sistema Cyprus safeguarding contact or a Designated Child Protection Person.

## **7. Accommodation, Transport and Supervision**

Sistema Cyprus will check accommodation before use, including its location, accessibility, fire and emergency arrangements, rooming conditions and distance from activity venues.

Participants under 18 will not share bedrooms with unrelated adults. Adults must not enter a minor's bedroom alone except in an emergency or where necessary to protect a participant. Wherever possible, another responsible adult will be present or informed.

Room allocations will respect participants' age, privacy, dignity, safety and individual needs. Sensitive rooming requirements will be discussed confidentially with the participant, sending organisation and, where applicable, their parent or guardian.

The written partner agreement will identify who supervises participants during:

- organised activities;
- meals and travel;
- accommodation periods;



- performances and public events; and
- planned free time.

Participants will receive clear meeting points, check-in times, boundaries and emergency contacts. Group leaders will maintain appropriate awareness of participants' whereabouts and conduct agreed headcounts.

Local transport and airport or port transfers will be planned in advance. Drivers and providers will be appropriately authorised and assessed according to the nature of the service.

## **8. Interaction with Sistema Cyprus Participants**

Visiting youth workers, staff, Teaching Artists, volunteers and accompanying persons must follow the Sistema Cyprus Child Protection Policy and relevant Code of Conduct whenever they interact with Sistema Cyprus participants.

They must not have unsupervised access to children unless this has been specifically authorised and all required safeguarding checks and arrangements have been completed.

Joint activities will be structured to promote inclusion and safe interaction. Staff will remain alert to bullying, discrimination, harassment, exclusion, inappropriate relationships and harmful behaviour between participants.

Language, cultural or communication barriers will be considered when explaining expectations, observing group dynamics and providing reporting opportunities.

## **9. Health, First Aid and Emergencies**

Each sending organisation must ensure that its participants have appropriate travel and medical insurance and provide relevant health information before arrival.

Sistema Cyprus will identify:

- available first aiders and first-aid equipment;
- nearby medical services and hospitals;
- procedures for contacting emergency services;
- arrangements for medication and health support; and
- procedures for serious illness, injury, missing participants, safeguarding incidents or major disruption.

Medication will be managed according to arrangements agreed with the participant, sending organisation and, for minors, their parent or guardian.



If a participant becomes missing, Sistema Cyprus and the group leader will immediately implement the agreed emergency procedure. The Police, emergency services, sending organisation, parent or emergency contact and other relevant persons will be informed as appropriate.

## **10. Photography, Filming and Communication**

Sistema Cyprus will respect the photography and media permissions communicated by the sending organisation. Participants who do not consent will be identified to authorised communications personnel through an appropriate and discreet process.

Visitors, participants and partner representatives must not publish identifiable images, recordings or personal stories without the required consent and authorisation. Personal information concerning migration status, health, family circumstances or safeguarding needs must not be disclosed through communications or publicity.

Communication between adults and participants must use appropriate channels and remain related to the mobility. Secret, sexualised, exploitative or otherwise inappropriate communication is prohibited.

## **11. Reporting and Responding to Concerns**

Any concern arising during a hosted mobility must be reported immediately to the local safeguarding contact or one of the Sistema Cyprus Designated Child Protection Persons.

The person receiving the concern must:

- prioritise the participant's immediate safety;
- listen calmly and avoid investigating or asking leading questions;
- contact emergency services where required;
- inform the appropriate safeguarding contacts;
- create an accurate factual record; and
- share information only with persons who need it to protect the participant or take action.

Sistema Cyprus will coordinate the immediate response in Cyprus, in consultation with the sending organisation and competent authorities. The sending organisation will support communication with the participant's family and relevant authorities in the country of origin, unless doing so could increase risk or interfere with an investigation.

If a concern involves a visiting group leader or accompanying person, it may be necessary to remove that individual from participant contact. The sending organisation must provide an alternative responsible person where required.



Disagreements between organisations must not delay action necessary to protect a child or young person. Sistema Cyprus may suspend an activity or a person's participation if safeguarding requirements are not followed.

## **12. Follow-up and Review**

At the end of the mobility, Sistema Cyprus will:

- provide participants with an opportunity to raise concerns privately;
- follow up any unresolved health, wellbeing or safeguarding matters;
- confirm outstanding responsibilities with the sending organisation;
- collect feedback on safety, inclusion, accommodation and support;
- review any incident and the effectiveness of the response; and
- incorporate lessons into future hosted activities and partner agreements.

Safeguarding records will be stored securely and separately from general project documentation. Information will be retained and shared only in accordance with safeguarding, legal and data-protection requirements.