

INTERNAL CHILD AND YOUTH PROTECTION POLICY
UNION OF PORTUGUESE MUTUALITIES

1. Definition, scope and application

The Union of Portuguese Mutualities (hereinafter referred to as UMP) considers the defence and safeguarding of the integrity and well-being of children as fundamental requirement, including their protection against all forms of abuse and exploitation. Therefore, UMP reinforces its commitment to the protection and promotion of the rights of children and young people through this Child and Youth Protection Policy, which establishes the principles and guidelines for protection against all forms of abuse, neglect, exploitation, and violence. It guarantees a safe and welcoming environment in all activities promoted and/or participated in by UMP.

2. Scope

Define principles and guidelines for the protection of children in all activities carried out by UMP, in order to:

- Protect them from mistreatment and abuse in all activities developed by UMP;
- Establish explicit guidelines on how adults are expected to behave with children and young people and how they should act if they identify risks to their safety;
- Safeguard the reputation and credibility of UMP, and the people who are part of and collaborate with the institution, by clarifying the practices and rights that ensure and promote the safety and well-being of children and young people.

3. Legal Definition

This Child and Youth Protection Policy uses the international law definition established in the Convention on the Rights of the Child (CRC), adopted at the United Nations General Assembly in November 1989, which, in its Article 1, considers that *“a child means every human being below the age of 18 years.”*

3.1 Legal Application

This child and youth protection policy is governed by national and international jurisdictions, including:

Constitution of the Portuguese Republic (Article 69): Ensures that "*children have the right to the protection of society and the State, with a view to their integral development, especially against all forms of abandonment, discrimination, oppression, and the abusive exercise of authority in the family and other institutions.*"

Convention on the Rights of the Child (1989): Ratified by Portugal on 21 September 1990.

Law for the Protection of Children and Young People in Danger: Approved by Law No. 147/99, of 1 September, and its updates – establishes protection measures for children and young people in situations of risk or danger.

National Commission for the Promotion of the Rights and Protection of Children and Young People (CNPDPJ): Created by Decree-Law No. 159/2015, of 10 August – aims to coordinate and support the protection and promotion of the rights of children and young people throughout the national territory.

National Penal Code: Articles 163 to 170, relating to crimes against sexual freedom; and Articles 171 to 176-A, on crimes against sexual self-determination.

Personal Data Protection Law: Approved by Law No. 58/2019, of 8 August – Ensures the implementation, in the internal legal order, of Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27 April 2016, concerning the protection of natural persons with regard to the processing of personal data and the free movement of such data.

4.Guiding Principles for Best Interests of the Child

All decisions and actions must prioritize the well-being and rights of children - This principle is enshrined in the Convention on the Rights of the Child (1989) and is a fundamental pillar in European and national legislation. The goal is to ensure that, in all circumstances, the physical, emotional, and social needs of children are prioritized;

Non-Discrimination - An essential principle that guarantees all the rights of children are protected, regardless of race, gender, ethnicity, origin, religion, or socio-economic status. This principle is enshrined in the Charter of Fundamental Rights of the European Union (2000) and

the Convention on the Rights of the Child (1989). It ensures that all children have equal access to their rights, promoting inclusion and equality.

Participation - Recognizes the right of children to be heard and to participate in decisions that affect their lives. This principle is included in the Convention on the Rights of the Child, which considers active participation of children fundamental to their development and ensuring their needs and interests are represented.

4.1. In this regard, UMP considers that:

- Creating a safe environment for children depends on the collaboration of everyone;
- No types of physical or emotional mistreatment towards any child are tolerated;
- All individuals who have contact with children must be informed, trained, and guided to comply with and apply this policy;
- All adults who come into contact with children are responsible for ensuring their rights are respected;
- All children have the right to protection, regardless of sex, culture, ethnicity, age, religion, sexual orientation, or condition.

5. Application

This policy applies to members of the UMP's Associative Bodies, all UMP staff, as well as any service providers and all individuals who have contact with children. Violations of this policy constitute misconduct and are subject to disciplinary and criminal measures, which may include dismissal.

6. Safeguarding Standards

Members of the Associative Bodies, staff, service providers, and all individuals who have contact with children must know and understand the provisions and principles of the Convention on the Rights of the Child and, within the scope of the actions developed by UMP, must follow the guidelines stated in this policy.

6.1 Inappropriate behaviors and conduct towards children are not admitted, including:

- Inappropriate Power: (The abusive or inadequate use of a position of authority or influence to impose control or cause suffering to others);
- Repeated, targeted, or continuous demeaning criticism;
- Acting hostile, verbally abusive, adopting behaviors of rejection or blame;
- Applying physical or psychological punishments;
- Making excessive or unreasonable demands;
- Using inappropriate and discriminatory language based on personal characteristics or related to ethnicity, sex, religion, culture, and others;
- Acting in a threatening or coercive manner.
- Inappropriate Familiarity (represents the breaking of professional or authoritative barriers by establishing a personal or informal relationship that exceeds appropriate limits, particularly in contact with children)
- Giving gifts to the child in isolation;
- Allowing the child to break established rules;
- Inviting the child to visit their own home;
- Home visits without specific technical objectives and/or without the presence of a present caregiver;
- Special favors, namely granting privileges or benefits arbitrarily and individually, without legitimate justification, usually aimed at creating a relationship of dependence or undue favoritism.
- Establishing personal contact (exchange of phone numbers, social networks, email, etc.).

6.2 Appropriate Conduct:

Individual moments with children must occur, justifiably, in an appropriate context, with the knowledge and consent of the Institution or caregiver. In such situations, more than one UMP person should be present, promoting a safe environment that protects the individuality, privacy, and confidentiality of the children.

Physical contact may occur in the following situations:

- Protection in situations of imminent risk to the child or others;
- Assessment of illness or injury in the child;
- Requirement of the activity itself (e.g., feeding, hygiene, changing clothes, accompanying educational activities);

- Need for comfort and emotional containment of the child.
- Manifestation of affection or greeting (This refers to physical or gestural interactions that may occur in the context of professional, educational, or caregiving relationships, aimed at expressing affection, respect, or courtesy, provided they are conducted within ethical limits and appropriate to the context. These manifestations must always respect the child's dignity, personal boundaries, and social and cultural norms).

6.3 Situations Requiring Special Care:

- Transporting a child in a private car should not occur except with special authorization from the caregiver or Institution, in an emergency situation;
- In case of transport, the child's safety must be ensured, following all legal requirements (seat belts, appropriate restraint and booster systems, etc.);
- The recording and display of sound and images of children should only occur in a properly framed context and with the authorization of the guardians or legal representatives.

6.4 Initial Training in Child Protection:

It is mandatory for all UMP workers, regardless of whether they work directly with children or not. The training should include protection measures and identification of signs of abuse, reporting procedures, and appropriate conduct. Every year, workers must undergo training activities to update on new practices and legislative changes.

Human Resources Procedures: All UMP workers, collaborators, and volunteers who develop activities with children or in facilities intended for children must present a criminal record issued within 90 days before starting work with children.

Response Procedures: All UMP workers must know how to proceed in cases of child abuse and/or neglect and must report to the designated contact point, which should be well-known to all.

7. Child Safeguarding Officer

UMP will designate at least two people to be internal contact points for child protection, one primary and one alternate, to ensure that one contact point is available to receive potential reports. The contact information of the individuals designated by the Presidency of the Board of

Directors should be disseminated through internal communication channels and updated as necessary.

7.1 How and When to Report

Whenever alarm signs are identified, which may indicate abusive or neglectful behaviors, whether physical or psychological, the following steps should be taken:

- Record observations about the identified situation with as much detail as possible, such as: date, time, place, people involved, and an objective description of what was observed or said;
- Report the information to the designated contact person as quickly as possible;
- Maintain confidentiality, not sharing the information with uninvolved people or unauthorized third parties;
- Collaborate with additional information when requested.

7.2. The internal responsible person, after receiving the report, should:

- Conduct the initial assessment of the case – review the received information, assess the severity and need for immediate action.
- Contact the competent authorities – Child Protection Commission or law enforcement (PSP, GNR).
- Document the cases – in a confidential and restricted-access manner, including the case report and actions taken.
- Inform the reporter – within the confidentiality limits, the internal responsible person must inform the reporter about the actions taken.

8. Whistleblower

Whistleblowers will have their identity protected whenever possible to avoid possible retaliation for reporting in good faith a suspicion of abuse. Internal procedures must always comply with the legal reporting obligations provided for in Law No. 147/99, of 1 September, called the Law for the Protection of Children and Young People in Danger, which, in its Article 66, establishes guidelines for reporting dangerous situations: *"1 - Anyone who is aware of the situations provided for in Article 3 may report them to the entities with competence in childhood or youth matters, police entities, protection commissions, or judicial authorities. 2 - Reporting is*

mandatory for anyone who is aware of situations that endanger the life, physical or mental integrity, or freedom of the child or young person. 3 - When communications are directed to the entities referred to in paragraph 1, they proceed with a summary study of the situation and provide protection compatible with their attributions, informing the protection commission whenever they consider that their intervention is not adequate or sufficient."

9. Protection of the Victim

Until all stages of the reporting process are completed, victims must be protected to avoid any form of contact with the suspect.

10. Monitoring and Evaluation

To ensure the effectiveness and compliance of UMP's procedures for the protection of children, this policy must undergo a review and update process every 12 months, which should be recorded on the last page of the document, with the date of the review and items changed.

11. Implementation and Compliance

It is the responsibility of the Board of Directors to ensure that the standards of this document come into force, are properly implemented, updated, and complied with. All adults who collaborate with UMP and have contact with children must present their criminal record at the admission stage, and subsequently, once a year, as required by Law No. 113/2009, of 17 September. Labor contracts, internships, volunteer work, and service provision contracts must include an addendum on the need to comply with this Child and Youth Protection Policy, with the contractor filling out and signing the acknowledgment statement. UMP staff and volunteers, after being made aware of the contents of this document, must sign the acknowledgment and commitment term (attached).

12. Final Provisions

This Child and Youth Protection Policy seeks to ensure a safe, inclusive, and respectful environment for all children and young people under the care of UMP professionals and other

related elements. UMP reaffirms its commitment to implementing practices that promote the well-being and safety of everyone, preventing any form of negligence, abuse, or discrimination. All guidelines, determinations, and other effects of this document will come into force from the date of signature.

Esmoriz, Portugal, 28 January 2025

The UMP Board of Directors,