



# **CHILD SAFEGUARDING ACTION PROTOCOL**

NG-CTO-014

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## 01. INTRODUCTION AND PURPOSE.

This Protocol forms part of LALIGA's Child Safeguarding Management System and serves as a practical tool for addressing risk situations related to the protection and well-being of children participating in activities and projects organized by LALIGA. Accordingly, the purpose of this Protocol is to:

- a. Ensure safe and protective support for all individuals involved, with particular attention to children, including both those who have experienced violence and those who may have perpetrated it, to promote recovery and prevent the recurrence of similar situations in the future.
- b. Provide basic guidance on how to act in any situation that may pose a risk of any kind to children, setting out recommended steps for each case, with particular focus on situations of vulnerability and peer-to-peer conflicts.
- c. Establish specific and mandatory response guidelines for situations involving violations of rights, particularly cases of violence against children, applicable to all professionals involved in activities with minors.
- d. Set out the steps for referring to situations that require the intervention of specific authorities or specialized services.
- e. Establish guidelines for coordinated communication and cooperation between LALIGA and partner entities involved in activities with children, in order to ensure effective coordination in situations involving violations of rights, particularly cases of violence.
- f. Ensure compliance with the obligation to report cases involving violations of rights, particularly violence against children, to the competent authorities, providing all necessary information and offering full institutional cooperation in any official proceedings initiated.
- g. Establish cooperation guidelines for the preservation and provision to competent authorities of any evidence, documentation or information relating to situations that may constitute any form of criminal offence.

## 02. SCOPE OF APPLICATION.

This Protocol applies, without exception, to all entities within the LALIGA organization and is mandatory for all personnel, regardless of their geographical location, hierarchical level or role. In particular, it applies to all individuals who are directly or indirectly involved in activities with children.

This Protocol shall also apply to entities collaborating in the organization and/or delivery of any activity or project involving children, unless such entities have their own equivalent policies or protocols that are consistent with this Protocol and with applicable legislation. In all cases, such entities must provide their personnel with the necessary training and ensure that they have the appropriate experience and knowledge to carry out their professional responsibilities in relation to children.

## 03. ACTION CRITERIA FOR CHILD SAFEGUARDING.

### 3.1. Specific principles governing action to protect children.

The specific nature of interventions in situations of risk—such as vulnerability, peer-to-peer conflict and violations of rights, particularly cases of violence against children—requires special attention to the following guiding principles, which shall apply in all such situations:

a. Rights-based approach, with regard to:

i. Non-discrimination: ensuring the best possible treatment for all children, as well as for their families and adult caregivers, regardless of their personal or social characteristics. Specific attention shall be given to addressing power imbalances that may arise on the basis of gender (particularly affecting girls and women), age, disability or mental health conditions, sexual orientation or gender identity, ethnic or social background, legal status, living in institutional care (such as residential facilities or boarding schools) or under child protection measures (including foster care, residential care or adoption) or any other difference that has resulted in inequality.

ii. The best interests of the child: adopting, as a fundamental decision-making criterion, the full realization of all the rights of each child or adolescent, taking precedence over the interests of adults (families, legal guardians, professionals) and of organizations (including LALIGA, its partner entities and the broader sporting, educational and social institutions).

iii. The right to survival and to a fulfilling life: carrying out actions that ensure the maximum development of each child, with particular attention to their specific needs.

iv. Participation and empowerment: ensuring that each child is actively involved in any process that affects them, considering their views and preferences and, where appropriate, conveying them to the authorities involved in the relevant proceedings.

b. Individualized response: providing tailored support to each child who has experienced a violation of rights, particularly violence—whether as a victim, as a person who has caused harm, or as a direct or indirect witness—to ensure their recovery and the resumption of their full development following the experience.

c. Duty of protection: recognizing the responsibility of each professional and each entity towards the children under their care, ensuring that actions taken fall within the legal competences of each role or organization and are carried out in accordance with applicable legislation.

d. Confidentiality and privacy: safeguarding the confidentiality and privacy of all individuals involved, particularly children and their families or legal guardians, by ensuring that relevant information is shared solely with those individuals or entities who require it for protection-related decision-making, while preserving privacy in all other contexts.

e. Effectiveness and efficiency: acting promptly and diligently in response to any suspicion or evidence of risk or harm and communicating all available information to the competent individuals or authorities to enable swift resolution. Effective and efficient action helps to prevent re-victimization and supports timely and appropriate outcomes.

f. Compliance with legal obligations: fulfilling all applicable legal duties, including reporting to the competent individuals or authorities and cooperating fully in any processes that may be required.

g. Coordination between collaborating entities: recognizing that joint communication of situations involving violations of rights, particularly violence against children, by LALIGA and collaborating entities involved in activities organized or co-organized by LALIGA strengthens the response and facilitates compliance with the requirements of the competent authorities.

### 3.2. Key distinctions between suspicion and evidence.

As safeguarding responses differ depending on the type and strength of the indicators available, it is essential to clearly distinguish between the key concepts of evidence and suspicion:

a. **Evidence:** is generally easy to identify, as it consists of specific and concrete elements indicating that harm has been inflicted on a child by another person. Evidence is considered to exist in the following situations:

i. An adult directly witnesses a situation involving a violation of rights, particularly violence against a child, and can describe it as observed.

ii. The child who has experienced a violation of rights, particularly violence, discloses or describes what has happened. For the purposes of this Protocol, a child's verbal disclosure of such a situation shall be regarded as evidence. In such cases, the obligation is to record the child's exact words, without questioning the validity of the statement, which may be assessed by the designated specialized teams within the relevant procedures, if necessary.

iii. Other individuals (adults or children) have witnessed the situation and are able to describe it as observed.

iv. The child presents non-accidental marks or injuries.

v. Recordings of the incident exist on security or surveillance cameras.

vi. Violations of rights, particularly violence against children, have occurred through information and communication technologies, and electronic material exists that contains or reflects actions harmful to the child's well-being (such as messages, images, recordings or the dissemination of private information).

b. **Suspicion:** Refers to all other situations in which there are indirect indicators suggesting that a child may be experiencing harm, a violation of rights or violence by others, but where no direct evidence is available. Annex 1 includes a summary table of indicators of violence.

### 3.3. Duty to report safeguarding concerns.

LALIGA requires its professionals and collaborating entities to adhere to the highest ethical standards and to comply with applicable legislation. Accordingly, the reporting of any suspicion or evidence of violations of rights, particularly violence against any child, is mandatory.

Such reports must be submitted immediately, in writing and through the reporting channels available at any given time, to the individual who holds the role of Child Safeguarding Officer in relation to the relevant activity, project or entity, and in all cases to LALIGA's Child Safeguarding Office ([safeguarding@laliga.es](mailto:safeguarding@laliga.es)). The report must include the following information:

- a. Details of the person who identified the situation or received the disclosure.
- b. Details of the designated Child Safeguarding Officer assigned to the relevant activity, project or entity.
- c. Details of the child or children affected.
- d. Details of the person or persons alleged to have caused the reported situation.
- e. Details of any person who may be able to provide relevant information.
- f. A description of the incident.

### 3.4. Avoiding further harm: a safe and protective approach.

Situations involving violations of rights, particularly violence, are characterized by the harm they cause to children across different areas of their lives (always at a psychological level and, depending on the circumstances, also at a physical or sexual level). A safe and protective response provides emotional containment and avoids causing further harm. In order to prevent additional harm to children, the following principles must be observed:

- a. **Do not question or interrogate.** Probing into the details of a situation of violence may be harmful, both emotionally and legally. Instead of questioning, any information provided by the child should be recorded accurately and objectively.
- b. **Do not investigate or make judgements.** Only legally competent authorities are authorized to conduct investigations, ensure the procedural rights of all parties involved, and determine whether the facts constitute a criminal offence.
- c. **Ensure medical attention in cases of serious harm.** Where a child is in a situation involving serious harm (such as physical pain, bruising or wounds), or presents marks that require forensic documentation (including injuries or potential evidence of abuse or violence), appropriate medical attention must be ensured before initiating the corresponding safeguarding response. In such cases, the following steps shall be taken:
  - i. Accompany the child to a designated healthcare facility, typically a hospital, in order to ensure that any necessary forensic examinations can be carried out. At least two adults must act as escorts: one primarily responsible for providing emotional support to the child and another responsible for official coordination (representing LALIGA or the collaborating entity and liaising with the authorities and with the family or legal guardians).
  - ii. Provide the healthcare facility with all information necessary to enable it to activate the appropriate child safeguarding protocol. This requires access to the child's basic personal details and the contact details of their family or legal guardians.

iii. Once at the healthcare facility, contact the family or legal guardians to inform them of the situation and advise them on how to attend, where appropriate. This step shall not be taken where the family or legal guardians are the alleged perpetrators of physical harm, as further explained below.

iv. Complete the remaining steps of the relevant response procedure and report the incident to the individual who holds the role of Child Safeguarding Officer in relation to the activity, project or entity concerned, as well as to LALIGA's Child Safeguarding Office, which shall, where applicable, coordinate communication with the competent authorities.

## 04. RESPONSE IN SITUATIONS OF VULNERABILITY.

Vulnerability is understood as any situation in which a child may experience limitations or restrictions on the exercise of their rights as a result of personal or social characteristics, leading to discrimination.

Such vulnerability does not arise from any defect, responsibility or failing on the part of the child, but rather from the way in which certain individuals or society interpret and respond to those characteristics. Accordingly, any difference may become a factor of vulnerability, including gender, age, disability or other forms of functional diversity, belonging to a different ethnic, social or cultural group, sexual orientation or gender identity, personal or social isolation, lower physical or sporting ability, or any other distinguishing characteristic that may be used to exclude or marginalize a child.

The response to situations of vulnerability is primarily preventive in nature and seeks to ensure that every child can fully enjoy their rights, both within the context of activities organized or co-organized by LALIGA and across all areas of their lives. The intervention is structured as an ongoing process comprising the following steps:

- a. Identify situations of vulnerability within the technical and/or socio-educational team.
- b. Treat the child with equity and non-discrimination, ensuring their participation and the full enjoyment of their rights in activities organized by LALIGA.
- c. Implement educational measures at group level—such as awareness-raising workshops, gender equality initiatives or actions to address racism and xenophobia—to ensure the full participation and inclusion of the child in LALIGA activities and to prevent any form of discrimination.
- d. Promote the full exercise of rights within the educational and social environment, supporting the child in leading a dignified life. In addition, LALIGA and its collaborating entities must promote the child's well-being both within the activities they organize and beyond them.
- e. Periodically review participation conditions, ensuring that all children take part in LALIGA activities on equal terms, continuously assessing their level of inclusion and implementing positive actions to encourage the participation of children from underrepresented groups.

If a child discloses self-harm, suicidal ideation, eating disorders or other mental health difficulties during LALIGA activities, and there is no suspicion or evidence identifying another person as responsible for the situation, it shall be treated as a situation of vulnerability. In such cases, the family or legal guardians must be informed, both in person and in writing, as they are responsible for activating the necessary measures to safeguard the child's well-being.

LALIGA's Child Safeguarding Office may provide guidance and support to facilitate access to appropriate health services. If the family or legal guardians fail to respond appropriately, the case shall be referred to the competent authorities due to potential neglect.

## 05. RESPONSE IN SITUATIONS OF PEER-TO-PEER CONFLICT.

Conflict is a part of everyday life and, when managed appropriately, it can help children learn to engage in dialogue and resolve differences in a non-violent manner, thereby improving coexistence within LALIGA activities. However, as conflict resolution is not always a developed skill and children may react impulsively, such disagreements can quickly escalate into situations of violence or bullying if timely intervention does not take place. For this reason, addressing conflicts in a consistent and constructive manner is essential to preventing peer-to-peer violence.

Intervention to manage such conflicts is structured around the following five steps:

- a. Adults must manage their own conflicts—both with other adults and with children—in a respectful and non-violent manner, thereby setting behavioral standards for conflict resolution in all contexts and serving as positive role models so that children can learn to address their own conflicts in a safe and confident way.
- b. Identify the details of the conflict situation. The technical and/or socio-educational team must analyze the situation, distinguishing between the apparent cause and the underlying factors, and may seek support from the Child Safeguarding Focal Points and Child Safeguarding Officers to better understand the group dynamics. Lasting resolution of an apparent conflict is only achieved when the underlying conflict is properly addressed and responded to in an appropriate manner.
- c. Carry out an educational intervention aimed at resolving conflict and promoting respect and a collaborative environment among children. Guidance may be sought from the Child Safeguarding Officers, as well as from LALIGA's Child Safeguarding Office.
- d. Where necessary and appropriate, involve the families or legal guardians of the children affected by the conflict. These key figures can provide additional insight and strategies for addressing the situation, as well as support the implementation of the measures adopted.
- e. Monitor and follow up on the conflict. It is necessary to verify whether the situation has been resolved, whether it re-emerges in new conflicts, or whether it escalates into a situation of peer-to-peer violence, in which case a different response would be required.

## 06. RESPONSE IN SITUATIONS OF VIOLENCE AGAINST CHILDREN.

### 6.1. Situations of violence against children.

- a. Suspicion or evidence of violence by LALIGA personnel.

Children rely on multiple adults within sporting and educational environments. When adults act appropriately, they contribute positively to children's development and well-being; however, the misuse of power, authority or influence may cause serious harm. For this reason, intervention must be prompt and effective in order to restore the child's safety.

For the purposes of this Protocol, LALIGA personnel refers to any individual who maintains a direct employment relationship with the organization, regardless of their area of activity or the functions assigned to them in relation to activities or projects involving children.

- b. Suspicion or evidence of violence by personnel of an entity collaborating with LALIGA in activities organized by LALIGA.

LALIGA carries out activities with children in collaboration with partner entities—including sporting, educational, social and corporate organizations, among others—in order to broaden their positive experiences and their engagement with different social stakeholders. Although these entities are selected on the basis of good practice and a commitment to respectful and appropriate conduct, situations may arise in which a member of their staff or a subcontractor act in an inappropriate or harmful manner during activities involving children.

For the purposes of this Protocol, personnel of an entity collaborating with LALIGA in the context of activities and projects involving children refers to any individual who maintains an employment, contractual, commercial or collaborative relationship, whether direct or indirect, with such entity. This includes technical, educational and social teams, healthcare professionals, administrative staff, cleaning, maintenance and transport personnel, management and executive staff, interns or trainees, volunteers, as well as any other individual who, in the course of their professional duties, may interact with children and adolescents under the responsibility of the collaborating entity.

### c. Suspicion or evidence of violence perpetrated by another child.

Situations of violence against children may be perpetrated by other children. Such situations may occur between two individuals or within groups, within the same team or between different teams, and may involve children of similar or significantly different ages. While the range of scenarios is diverse, all such situations share a common element: all children involved—those who experience the violence, those who perpetrate it and those who witness it—are rights holders, particularly regarding the right to be protected from all forms of violence.

For this reason, any response must ensure the well-being and protection of all children involved, including those who have caused harm. An appropriate intervention should focus both on repairing the situation and addressing its underlying causes, as well as on supporting the full development of who engage in violent behavior, so that they can grow into individuals who do not resort to violence in their daily lives.

### d. Suspicion or evidence of violence perpetrated by a person outside LALIGA-related activities.

Children may face situations of violence in many contexts unrelated to LALIGA's activities, including within their families, in educational or care settings, in sports activities organized by other entities, in social and cultural spaces, during leisure and free-time activities, within their community environments, or even through social media. Such situations may be caused by both adults and other children.

Activities linked to LALIGA must be carried out in safe and protective environments, to the extent that children may turn to them to seek help with problems occurring outside those activities. In many cases, the intervention of LALIGA and its collaborating entities can be crucial in activating protection mechanisms and ensuring the safety of children who may not previously have received support.

### 6.2. Response procedure in situations of violence against children.

- a. Standard response procedure in situations of violence against children.

The procedure set out below establishes the common response guidelines applicable to

any situation of violence against children described in the preceding sections, regardless of whether the person involved is LALIGA personnel, personnel of a collaborating entity, another child or an individual outside LALIGA-related activities. This procedure provides a standard framework to ensure a prompt, coordinated and protective response. Where necessary, it may be adapted to the specific circumstances of each case, always within the common framework established herein:

- i. Any individual or team that identifies indications or suspicions of a violation of rights—particularly violence—against a child must report the situation immediately to the person who holds the role of Child Safeguarding Officer in relation to the relevant activity, project or entity and, in all cases, to LALIGA's Child Safeguarding Office ([safeguarding@laliga.es](mailto:safeguarding@laliga.es)).
- ii. LALIGA's Child Safeguarding Office and/or the Child Safeguarding Officer of the relevant activity, project or entity must prepare an initial report in collaboration with the individual who identified the situation.
- iii. LALIGA's Child Safeguarding Office and/or the Child Safeguarding Officer of the relevant activity, project or entity must inform the families or legal guardians of the children involved of the situation and, where applicable, of any communication with the competent authorities. Any relevant information provided by the family or legal guardians shall be incorporated into the report.
- iv. LALIGA's Child Safeguarding Office and/or the Child Safeguarding Officer of the relevant activity, project or entity must establish the necessary measures to protect the children involved, their families, other participants, the affected staff and also the individual suspected of, or against whom there is evidence of, violence. In order to ensure the protection of all children, temporary safeguarding measures may be put in place to guarantee a safe and orderly return to normal activities for the child who has experienced the situation.
- v. The Child Safeguarding Office and/or the Child Safeguarding Officer of the relevant activity, project or entity must determine how to communicate the measures adopted and the procedure to be followed to the individual suspected of, or against whom there is evidence of, having committed violence against children, as well as the manner in which any statements or representations may be received, where applicable.
- vi. Any new relevant information shall be added to the case file and, where applicable, communicated to the competent authorities.
- vii. Where the situation has been reported to the authorities, the appropriate measures shall be adopted in each relevant area whenever the authorities issue a conclusion, opinion or ruling.

**b. Extraordinary response procedure where suspicion or evidence concerns a person with care and safeguarding responsibilities.**

Where a suspicion of a violation of rights, particularly violence, concerns a person with responsibilities related to the care or protection of children, a specific response procedure shall be activated. The actions envisaged for such cases are set out below, distinguishing between situations involving individuals with professional responsibilities within LALIGA, individuals with professional responsibilities within collaborating entities, and, where applicable, families or other persons with caregiving authority. In this regard:

- i. Where the suspicion or evidence concerns the individual holding the role of Child Safeguarding Officer who is employed by and dependent on an external entity collaborating with LALIGA through which the relevant project or activity is carried out, the matter must be reported directly to LALIGA's Child Safeguarding Office ([safeguarding@laliga.es](mailto:safeguarding@laliga.es)).
- ii. Where the suspicion or evidence concerns LALIGA's Child Safeguarding Officer, the matter shall be reported directly to the Head of LALIGA's Compliance Body (single-member body).
- iii. Where the suspicion or evidence concerns technical staff of LALIGA's Child Safeguarding Office, the matter shall be reported to the Child Safeguarding Officer and to the Head of LALIGA's Compliance Body.
- iv. Where communication with the competent authorities is required, such communication shall be made before informing the family or legal guardians where any of the following circumstances apply:
  - Where the person allegedly responsible for the situation of violence is the individual who holds legal caregiving authority over the child, and there is no other figure able to ensure their protection.
  - Where informing the family or legal guardians may pose an additional risk to the child, including the risk of retaliation or attempts to conceal evidence or manipulate the situation.

## 07. INTERPRETATION AND QUERIES.

Any questions that may arise regarding the interpretation or application of this Child Safeguarding Action Protocol shall be addressed to LALIGA's Child Safeguarding Office ([safeguarding@laliga.es](mailto:safeguarding@laliga.es)), which shall promote the dissemination, understanding and compliance with this Protocol.

## 08. NON-COMPLIANCE.

All professionals, executives and members of LALIGA's corporate bodies are required to carry out their activities in accordance with and in compliance with the provisions of this Child Safeguarding Action Protocol. Any breach of this Protocol may be subject to disciplinary action in accordance with the applicable sanctioning or disciplinary regime in each case.

Furthermore, non-compliance with this Child Safeguarding Action Protocol may give rise to liability, including criminal liability, for the individual or entity responsible. Violence against children may result in the imposition of different types of sanctions depending on their severity, including custodial sentences, fines and disqualifications, which may affect the professional activities of both the individuals involved and the companies concerned.

## 09. ENTRY INTO FORCE.

This Child Safeguarding Action Protocol has been approved by LALIGA's Delegated Committee and shall enter into force on the day following its communication through LALIGA's internal digital communication channels.

**ANNEX.****ANNEX I. INDICATORS OF VIOLENCE.**

Violence may affect children in multiple ways, manifesting through physical, emotional and behavioral responses. While a single indicator requires attention, the presence of multiple indicators may require activation of the Protocol. The main indicators are set out below, grouped by area:

PHYSICAL	PSYCHOSOMATIC INDICATORS
<ul style="list-style-type: none"> <li>Scars and other physical marks.</li> <li>Delays or difficulties in sensorimotor development (lack of coordination or balance, frequent falls or accidents).</li> <li>Sexually transmitted infections and adolescent pregnancy (which may indicate sexual abuse).</li> </ul>	<ul style="list-style-type: none"> <li>Chronic pain and other psychosomatic disorders.</li> <li>Sleep disturbances (including nightmares).</li> <li>Eating difficulties or eating disorders (including anorexia and bulimia).</li> <li>Elimination disorders: enuresis, encopresis, chronic constipation or persistent diarrhea.</li> </ul>
EMOTIONAL	COGNITIVE
<ul style="list-style-type: none"> <li>Feelings of guilt and shame.</li> <li>Fear and/or anxiety.</li> <li>Depression and low self-esteem.</li> <li>Anger and/or aggressive behavior.</li> <li>Lack of emotional regulation.</li> <li>Difficulties with compassion and self-compassion.</li> </ul>	<ul style="list-style-type: none"> <li>Delays in cognitive development.</li> <li>Attention and concentration difficulties.</li> <li>Memory problems.</li> <li>Learning difficulties.</li> <li>Poor academic performance.</li> </ul>
BEHAVIOURAL	SEXUAL
<ul style="list-style-type: none"> <li>Impulse control difficulties: impulsiveness and problems complying with rules.</li> <li>Aggressive behavior.</li> <li>Running away.</li> <li>Self-harming and suicidal behavior.</li> <li>Substance use (alcohol and drugs) and addictive behaviors.</li> <li>Delinquent behavior.</li> </ul>	<ul style="list-style-type: none"> <li>Compulsive masturbation.</li> <li>Oral-genital contact.</li> <li>Sexualized behavior, including presenting oneself as a sexual object.</li> <li>Sexual aggression towards other children.</li> <li>Age-inappropriate sexual knowledge.</li> <li>Sexual revictimization.</li> </ul>

SOCIAL	INDICADORES DE DISOCIÓN
<ul style="list-style-type: none"> <li>Difficulties in social relationships.</li> <li>Social isolation.</li> <li>Repetition of patterns of violence.</li> <li>Antisocial behavior.</li> </ul>	<ul style="list-style-type: none"> <li>Vacant or blank stare.</li> <li>Extreme mood swings.</li> <li>Inability to remember done things.</li> </ul>

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