SECOND YOU LTD.

Child Protection Policy

CERV-ready full policy

This policy is intended to serve as the full Child Protection Policy required for private entities implementing activities involving persons under the age of 18 under relevant CERV calls. It is written as an organisation-wide policy and may be submitted in support of the project "MINDGUARD".

Document control

Organisation	Second You Ltd. (SY)
Organisation status	Private not-for-profit SME
Relevant project / annex use	MINDGUARD (organisation-wide policy submitted as supporting annex where activities involve children)
PIC number	883713069
Version	1.0
Policy owner	CEO & President, Second You Ltd.
Effective date	21 April 2026
Review cycle	Annual review, and earlier if law, guidance, organisational structure, delivery model, or risk profile changes

1. Policy statement and purpose

Second You Ltd. is committed to creating and maintaining an environment in which children are safe, respected, heard, and protected from abuse, exploitation, neglect, harassment, bullying, coercion, and avoidable harm. This policy sets out how the organisation prevents harm, identifies risk, responds to concerns, and meets its duty of care to children who participate in, are in contact with, or may be affected by its work.

This policy applies across all Second You activities that involve persons under the age of 18, including education, training, workshops, events, consultations, research, dissemination, communications, travel, online and blended activity, digital learning, project visits, and any project activity delivered with partners, experts, contractors, consultants, trainees, or volunteers acting on behalf of the organisation.

This policy is designed to meet the safeguarding expectations applicable to private entities under CERV calls and is structured in line with the four areas of the Keeping Children Safe Child Safeguarding Standards: Policy, People, Procedures, and Accountability.

2. Guiding principles

All children have equal rights to protection from harm, irrespective of age, sex, disability, language, nationality, migration status, ethnicity, religion, sexual orientation, gender identity, family circumstance, socio-economic background, or any other status.

All safeguarding action shall be taken in the best interests of the child.

Second You Ltd. adopts a zero-tolerance approach to child abuse, exploitation, grooming, harassment, and any form of harmful conduct by staff, associates, partners, or participants.

Safeguarding is everybody's responsibility. Every person working for or with Second You Ltd. must understand their role and act immediately on any concern.

Children have the right to be listened to, taken seriously, and supported in ways that are age-appropriate, trauma-aware, culturally sensitive, and inclusive.

Safeguarding applies equally to in-person and online environments.

Safeguarding arrangements must be proportionate to risk and built into project design, delivery, partnership management, communications, and data handling from the outset.

3. Scope and definitions

For the purposes of this policy, a child is any person under the age of 18. Child protection and child safeguarding are used in this document in the broad sense of preventing and responding appropriately to abuse, exploitation, neglect, and other harm arising from contact with the organisation, its representatives, its projects, its communications, or its partners.

Safeguarding concerns may include, without limitation: physical abuse; emotional or psychological abuse; sexual abuse; sexual exploitation; neglect; coercive control; bullying; discriminatory abuse; peer-on-peer abuse; online abuse; grooming; sextortion; trafficking concerns; harmful traditional practices; unsafe supervision; misuse of images; breaches of privacy; inappropriate digital contact; and reckless or exploitative use of personal data.

4. Governance, accountability, and safeguarding roles

Ultimate accountability for this policy sits with the CEO & President of Second You Ltd., who is responsible for ensuring that the organisation has appropriate safeguarding systems, leadership oversight, resources, and reporting lines in place.

For any project or activity involving children, the project lead must ensure that a documented safeguarding plan is in place before delivery begins. This must identify the responsible safeguarding contact(s), supervision arrangements, key risks, reporting routes, emergency contacts, consent arrangements, and partner responsibilities.

Second You Ltd. shall ensure that there is always a clearly designated safeguarding focal point at organisational level and at project level for activities involving children. Where a separate project safeguarding officer is not formally appointed, the CEO & President shall act as the default organisational safeguarding lead until delegation is made in writing.

All staff and associates must know how to report a concern. No person may assume that another colleague has already reported it.

5. Safer recruitment, screening, and engagement

Second You Ltd. shall apply safeguarding-informed recruitment and engagement procedures to employees, directors, facilitators, experts, trainers, volunteers, trainees, consultants, and contractors whose role may involve direct or indirect contact with children or access to children's data or images.

The organisation shall, proportionate to role and legal context, use a combination of role descriptions, identity checks, references, interview discussion of safeguarding responsibilities, self-declarations of suitability, contractual safeguarding clauses, and criminal record/background checks or vetting where legally permitted or required.

No person may begin unsupervised work with children until the required checks, induction, and approval steps have been completed or an exceptional interim arrangement, documented and risk assessed, has been authorised by the responsible safeguarding lead.

Partner organisations, external speakers, subcontractors, and venues used for child-facing activity must be subject to proportionate due diligence before engagement.

6. Codes of conduct and expected behaviour

All adults working for or with Second You Ltd. must behave in ways that protect children's safety, dignity, privacy, and wellbeing. They must model professional boundaries at all times and avoid conduct that is, or could reasonably be perceived as, exploitative, intimidating, degrading, manipulative, sexually inappropriate, discriminatory, or abusive.

The following are prohibited: corporal punishment; humiliating or shaming language; sexualised comments, jokes, images, or contact; private or secretive communication with children through personal devices or unapproved channels; being alone with a child behind closed doors without justification, visibility, or safeguarding control; taking, storing, or sharing images of children without authorisation; exchanging gifts or favours intended to influence a child; and any conduct that breaches the law or this policy.

One-to-one work must be justified by the activity, planned in advance where possible, and carried out using transparent arrangements such as open or observable spaces, visibility panels, appropriate ratios, or the presence/knowledge of another responsible adult. Any exception must be risk assessed.

All staff and associates are also required to challenge and report harmful behaviour by adults or by children towards other children when observed or disclosed.

7. Child-safe programme design and delivery

Every child-facing activity must be planned and delivered in a way that minimises foreseeable risk. This includes pre-activity risk assessment, age-appropriate design, inclusive access arrangements, supervision planning, venue suitability, emergency arrangements, sign-in/out control where relevant, safe waiting/collection arrangements, and clarity regarding who is responsible for the child at each stage of the activity.

Children and, where appropriate, their parents, carers, schools, or guardians must receive clear information about the purpose of the activity, what participation involves, the expected standards of behaviour, how data and images will be used, what support is available, and how concerns or complaints can be raised.

Participation must be voluntary unless the activity is delivered through a school or other institution operating its own attendance rules. Even where participation occurs in a structured institutional setting, children must still be informed, treated respectfully, and supported to voice concerns.

Second You Ltd. shall take particular care in relation to vulnerable situations, including disability, language barriers, migration or displacement, trauma, digital exclusion, and unequal power relationships, so that no child is disadvantaged in access to protection.

8. Online safeguarding, digital environments, and AI-enabled activity

Because Second You Ltd. delivers work in digital, blended, and innovation-oriented settings, this policy applies expressly to virtual classrooms, webinars, digital collaboration spaces, messaging platforms, educational applications, websites, social media environments, and AI-enabled tools used in learning, communication, or project support.

Unapproved personal messaging with children is prohibited. Communication with children must take place only through authorised, transparent, and auditable channels appropriate to the activity and the age of participants.

No member of staff or associate may upload sensitive personal data relating to a child into a public or consumer-facing AI tool unless there is a clear lawful basis, a documented organisational decision, appropriate contractual/data protection safeguards, and human oversight. Data minimisation and privacy-by-design must apply at all times.

Digital sessions must, where appropriate, use waiting rooms, moderated chat, controlled screen-sharing, transparent access rights, and adult oversight. Any online incident, harmful content exposure, inappropriate contact, impersonation, cyberbullying, or misuse of images must be treated as a safeguarding concern and responded to under this policy.

9. Consent, information-sharing, images, and data protection

Second You Ltd. shall obtain and record the permissions, consents, or institutional authorisations required by law and by the delivery context for participation, photography, filming, audio recording, publication, online engagement, transfer of data, and emergency medical information.

Children should receive information in age-appropriate language, and wherever possible their assent should be respected in addition to any parental, carer, or institutional consent that may be required.

Images and stories involving children must be used respectfully and only for legitimate purposes. Content must avoid stigmatising, sensational, exploitative, or identifying presentation. Full names, precise locations, personal contact details, and special category or sensitive information must not be published unless there is a clear lawful basis and specific authorisation.

Safeguarding-related information shall be shared strictly on a need-to-know basis. Records must be accurate, factual, timely, secure, and retained in accordance with applicable data protection and retention rules.

10. Recognising and reporting concerns

Any staff member, associate, contractor, volunteer, trainee, or partner representative who sees, suspects, receives, or is told about a safeguarding concern must act without delay. The responsibility is to report, not to investigate.

If a child is in immediate danger or requires urgent medical assistance, emergency services and/or the relevant local child protection authority must be contacted without delay, and the organisational safeguarding lead must then be informed as soon as possible.

Where there is no immediate emergency, concerns must be reported promptly to the relevant safeguarding lead on the same working day, and in any event within 24 hours of the concern being identified or disclosed.

The person receiving a disclosure must remain calm, listen carefully, avoid leading questions, avoid making promises of absolute confidentiality, explain that the concern will need to be shared with the appropriate person, and make a factual written record as soon as possible.

Concerns may relate to a child's experience outside the organisation if that concern becomes known during Second You activity. Such concerns must still be handled under this procedure and referred appropriately in accordance with the local legal and protection context.

11. Managing allegations against staff, associates, and partners

An allegation or concern involving a member of staff, associate, contractor, volunteer, trainee, or partner representative must be treated seriously, handled confidentially, and escalated immediately to the organisational safeguarding lead and senior management as appropriate.

Where the concern indicates that a child may be at risk, protective measures must be considered immediately. These may include removing the person from contact with children, suspending particular duties, preserving evidence, or notifying the relevant statutory authority, funder, school, venue, or partner, subject to legal advice and the best interests of the child.

Second You Ltd. will not attempt to internally determine criminal guilt. Internal fact-finding will be limited to what is necessary to manage immediate risk, preserve records, and comply with legal, contractual, or regulatory duties.

Malicious allegations are rare and should not be presumed. All concerns must be assessed fairly, proportionately, and without retaliation against the reporter or the child.

12. Referral pathways, support, and cross-border delivery

For each country or delivery location in which child-facing activity takes place, the project safeguarding plan must identify the appropriate emergency, child protection, welfare, and referral pathways relevant to that setting.

Where activities are delivered with schools, municipalities, NGOs, or other host institutions, safeguarding responsibilities and escalation routes must be clarified in advance and documented.

Children affected by an incident or concern must, where appropriate, be supported through safe referral, immediate practical support, communication with their responsible adults or institutions, and adjustments to participation arrangements.

Where projects operate across borders, the stricter or safer standard should be followed where there is uncertainty, provided it is lawful and practicable.

13. Training, awareness, and safer culture

All staff and associates with responsibilities under this policy must receive safeguarding induction appropriate to their role before they undertake child-facing activity. Refresher learning and policy familiarisation shall be provided on a continuing basis and whenever roles or risks change.

Safeguarding focal points and project leads shall receive additional training or guided support proportionate to their responsibilities, including allegation management, record-keeping, digital safeguarding, and referral practice.

Children, parents, carers, host institutions, and partners should be informed in accessible ways about expected standards of behaviour and how to raise a concern or complaint.

Second You Ltd. seeks to build a culture in which concerns are raised early, listened to respectfully, and acted on responsibly.

14. Partnership, subcontracting, and third-party expectations

No child-facing activity may be delegated to a partner, host, subcontractor, facilitator, or venue provider without proportionate safeguarding due diligence. This includes checking whether the third party has its own safeguarding policy, conduct rules, vetting arrangements, supervision model, reporting process, and relevant insurance or legal compliance where applicable.

Contracts, memoranda, or collaboration arrangements should include safeguarding expectations, reporting obligations, and the right of Second You Ltd. to intervene, suspend, or terminate activity where safeguarding standards are not met.

Where a partner's standards are weaker than those required under this policy, Second You Ltd. must agree and document supplementary controls before children are involved.

15. Monitoring, review, breaches, and record of compliance

Safeguarding performance shall be reviewed through project planning, risk assessment, incident review, training records, partner due diligence, and periodic management oversight.

Any breach of this policy may result in immediate protective action and may lead to disciplinary action, termination of engagement, contract cancellation, notification to funders or statutory authorities, and/or referral to law enforcement or professional bodies, as appropriate.

This policy shall be reviewed at least annually and after any significant safeguarding incident, near miss, legal change, major organisational change, or learning arising from implementation.

A copy of this policy should be made available online and shared transparently with those who come into contact with the organisation in line with CERV expectations.

Appendix A. Immediate response and reporting pathway

The following pathway is to be used for all safeguarding concerns.

Stage	Required action	Timing
1. Immediate safety	If there is immediate danger, seek emergency assistance, protect the child, and contact the relevant emergency/child protection authority.	Immediately

Stage	Required action	Timing
2. Internal alert	Inform the organisational or project safeguarding lead using the fastest safe method available.	Same working day
3. Written record	Create a factual written record: who, what, when, where, disclosure wording if relevant, observed injuries/behaviour, actions taken, witnesses, and next steps.	As soon as possible, normally within 24 hours
4. Risk management	Consider interim protective measures, information-sharing, referral, contact with parents/carers or host institutions, and preservation of evidence.	Without delay
5. Follow-up	Record decisions, referrals, outcomes, support actions, and lessons learned. Review whether risk controls need to change.	Ongoing until closure

Appendix B. Minimum code-of-conduct checkpoints for child-facing activity

- Use only authorised channels, platforms, and spaces for communication with children.
- Do not meet a child alone in secret, private, or unobservable conditions unless formally justified and safeguarded.
- Do not exchange personal phone numbers, personal social media details, or private messaging contacts unless expressly authorised within a documented safeguarding arrangement.
- Do not take or share photographs, video, screenshots, or recordings of children without appropriate authorisation.
- Do not use demeaning, provocative, discriminatory, sexualised, or intimidating language or behaviour.
- Do not physically intervene unless necessary for immediate safety and lawful within the context.
- Report any concern, boundary issue, or policy breach, however minor it may initially appear.

Approval and sign-off

Approved on behalf of Second You Ltd. for use as the organisation's Child Protection Policy and for submission, where required, as the full policy annex for private-body participation in CERV projects involving children.

Name	Dr. Daithí Ó Murchú
Role	CEO & President

Signature	
Date	Reviewed April 1, 2026

Reference framework

- European Commission CERV call documentation requiring private entities with activities involving children to provide a full child protection policy covering the four areas of the Keeping Children Safe Child Safeguarding Standards.
- Keeping Children Safe International Child Safeguarding Standards: Policy, People, Procedures, and Accountability.
- Second You Ltd. organisational profile as a not-for-profit SME.