

WELFARE AND SAFEGUARDING POLICY

SAFE SPORT LTD

Child Safeguarding Policy

Organization:	SAFE SPORT LTD
Date:	June 2026
Next Review:	July 2027
Scope of Application:	All persons involved with the NGO

1. Introduction and Purpose

SAFE SPORT LTD is a non-profit organization dedicated to creating safe, healthy, and inclusive sporting environments, primarily for children and young people in Cyprus, other Mediterranean regions as well as other neighbouring areas — not excluding activities beyond this geographical scope. The organization is active in the fields of welfare and protection, primarily within sport (safeguarding), providing training, consulting services, and running awareness campaigns targeting sports and other extracurricular bodies, parents, athletes (minors and adults), and volunteers.

Our mission is to support organizations in establishing, implementing, and maintaining safeguarding practices, to minimize the risk of abuse and ensure that sport and extracurricular activities remain safe, fair, inclusive and enjoyable for all participants.

This Safeguarding Policy constitutes a fundamental governance document of the organization and expresses our commitment to promoting the best interests of every child who engages in our activities and programmes and every adult who participates in the NGO's activities.

1.1 Legal and International Framework

This policy is grounded in the following local and international legal framework:

International legal framework

Universal conventions, charters, and principles:

- UN Convention on the Rights of the Child (UNCRC, 1989 – Article 19)
- UN Convention on Human Rights (UN, 1948 – Articles 2 and 5)
- Charter of Fundamental Rights of the European Union (EU, 2016, Articles 21, 23, 24, and 26)
- European Sports Charter for Children and Young People (Council of Europe – Articles 6 and 8)
- The principles of the World Health Organization (WHO) for the prevention of violence against children

More specifically, the international legal framework governing our policy is as follows:

1. Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse (Council of Europe, 2007)

Relevant Content

What is child sexual abuse?

The Lanzarote Convention, defines child sexual abuse as:

- engaging in sexual activities with a child who, according to the relevant provisions of national law, has not reached the legal age for sexual activities;
- engaging in sexual activities with a child where use is made of coercion, force or threats;

- abuse is made of a recognised position of trust, authority or influence over the child, including within the family;
- abuse is made of a particularly vulnerable situation of the child, notably because of a mental or physical disability or a situation of dependence.

The last three situations apply also to children above the legal age of consent.

Sexual offences against children include child sexual exploitation, various actions related to child sexual abuse material, sexual grooming/solicitation, and causing a child to witness sexual abuse or sexual activities. It may involve contact and/or non-contact activities and can happen in person and/or online (Council of Europe 2024: 8).

2. Council of Europe Convention on preventing and combating violence against women and domestic violence (Council of Europe, 2011)

Relevant Content

What is sexual violence?

The Council of Europe Convention on preventing and combating violence against women and domestic violence (known as “the Istanbul Convention”) defines sexual violence as the following intentional conduct (Council of Europe, 2011, p. 10):

- engaging in non-consensual vaginal, anal or oral penetration of a sexual nature of the body of another person with any bodily part or object;
- engaging in other non-consensual acts of a sexual nature with a person;
- causing another person to engage in non-consensual acts of a sexual nature with a third person.

These definitions would apply to sexual relations between child peers above the legal age to consent to sexual acts.

What is sexual harassment?

The Istanbul Convention defines sexual harassment as “any form of unwanted verbal, non-verbal or physical conduct of a sexual nature with the purpose or effect of violating the dignity of a person, in particular when creating an intimidating, hostile, degrading, humiliating or offensive environment” (Council of Europe 2011, p. 11).

3. Council of Europe Convention on action against trafficking in human beings (Council of Europe, 2005)

In addition, the policy implements:

- The EU Regulation 2016/679 (GDPR) on data protection
- The IOC and international sport federations’ guidelines on child welfare and protection in sport (safeguarding/safe sport)

1.2 Local legal framework

1. Law 91(I)/2014 on Preventing and Combating the Sexual Abuse and Sexual Exploitation of Children and the Depiction of Child Sexual Abuse Material (CyLaw 2014)

Relevant Content:

The Law establishes measures to prevent and combat offences involving the sexual abuse and sexual exploitation of children, the depiction of child sexual abuse material and the grooming of children for sexual purposes. This law also aims to protect and support victims, establish control and supervision mechanisms for victims and perpetrators, and promote international co-operation in implementing these measures (Article 3).

Under the above-mentioned Law, child sexual abuse and exploitation is defined as the conduct described in Articles 6–10 and 15.

Article 2 of this Law also defines a “child” as any person under the age of 18.

- The age of sexual consent in Cyprus is 17 years. However, even if a child has reached the age of sexual consent under the legislation of the Republic of Cyprus, it is still sexual abuse if an adult engages in sexual activities with the child using a recognised position of trust, authority or influence as provided for in Article 6(4).
- Anyone who becomes aware of an incident of sexual abuse or exploitation of a child has a legal obligation to report it. The Law holds criminally liable any person who has knowledge of the sexual exploitation or abuse of a child but fails to report it (Article 30).

Types/Forms of sexual abuse and exploitation

It is important to highlight that for an act to be considered sexual abuse, penetration, violence, pain or touching are not necessarily involved. Child sexual abuse can involve both physical and non-physical activity.

2. The Law on Violence in the Family, Prevention and Protection of Victims, of 2000, L.119(I)/2000 (CyLaw 2000)

Relevant Content:

- “Violence” – physical, sexual or psychological harm within the family.
- If violence happens in the presence of a child, the law also considers that as violence against that child (psychological harm counts).
- Article 35A – failure to report violence against a minor can itself be prosecuted.

3. The Law on Preventing and Combating Violence against Women and Domestic Violence, of 2021, L.115(I)/2021 (CyLaw, 2021)

Relevant Content:

- Aligns Cyprus with European standards/the Istanbul Convention.
- Covers gender-based and domestic violence, including violence against girls.

4. Law 51(I) of 2016, Establishing Minimum Standards on the Rights, Support and Protection of Victims of Crime (CyLaw, 2016a)

Relevant Content:

- Minimum standards for the treatment of victims.
- Protection from secondary victimization.

5. Criminal Code, Chapter 155 (CyLaw 2016b)

Relevant Content:

- Is applicable to non-sexual, non-domestic physical violence against a child (assault, threats, grievous bodily harm, etc.)

2. Scope of Application

This policy applies, without exception, to all natural and legal persons operating under the auspices of, or in collaboration with, SAFE SPORT LTD.

2.1 Persons Covered

- Board members
- Employees (full-time and part-time)
- Volunteers and trainees
- Trainers/Psychologists, coaches, referees, and other participants in sport and other extracurricular environments
- Partner sport clubs and other related institutions

- Licensed trainers delivering programmes on behalf of the organization
- Organizations and institutions receiving support from SAFE SPORT LTD

2.2 Child Definition

For the purposes of this Policy, in line with the International Convention on the Rights of the Child (Article 1), which is adopted by Cypriot legislation as well as by the legal conventions referred to above:

a "child" means any person under the age of 18 years.

Note. Scope beyond minors

Although this policy is primarily formulated with reference to the safeguarding of children and young people, the same approach (forms of abuse, relationships of responsibility, trust or power) applies to every athlete. The Organisation's approach to safety and wellbeing in sport is not limited to the protection of minors, but encompasses all athletes, both minors and adults.

3. Organizational Principles and Values

SAFE SPORT LTD is governed by the following fundamental principles:

- Every decision, action, or policy of the organization takes, first and foremost, in consideration the best interests of the child ("Will this action help the child?") (UNCRC, 1989, Article 3.1).
- Every child has the human right to be protected from every form of abuse, neglect, exploitation, and discrimination (UNCRC, 1989, Article 19).
- Every child has the human right to form their own views and to freely express those views about all matters affecting them, with due weight given to those views in accordance with the child's age and maturity (UNCRC, 1989, Article 12).
- Every child has the human right to be respected and to be ensured the rights within their jurisdiction without discrimination of any kind, irrespective of the child's or his or her parent's or legal guardian's race, colour, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status (UNCRC, 1989, Article 2.1).

4. Recognizing Forms of Abuse and Neglect

Staff and volunteers of SAFE SPORT LTD are trained to recognize the following forms of abuse, with an emphasis on the sporting environment but also more broadly:

4.1 Sexual Abuse

A) Some examples of acts involving physical contact (touching) include:

- Touching a child's genitals and/or other private parts of the body.
- Forcing or inviting a child to touch the genitals of another person (adult or child).
- Forcing or inviting a child to engage in sexual play or sexual contact by placing objects or body parts (such as fingers, tongue, or penis) into the child's vagina, mouth, or anus.

B) Some examples of acts without physical contact (non-touching) include:

- Exposing/showing pornographic material to a child.
- Deliberate exposure of an adult's genitals to a child.
- Photographing a child in sexual poses.
- Encouraging or forcing a child to watch or listen to sexual acts.
- Inappropriate observation of a child undressing or bathing.

- There is also the serious and growing problem of individuals producing and downloading child pornography, which involves sexual depictions of children in photographs and/or videos, online. Anyone who views images of child abuse is complicit in the abuse of the child.

4.2 Physical Abuse

Physical abuse includes any "act that attempts to cause, or results in, pain and/or physical harm" to a child. It includes "beating, burning, kicking, punching, biting, mutilation, or killing, or the use of objects or weapons" (Council of Europe, 2024, p. 12). Physical abuse can constitute (and often does constitute) inhuman and degrading treatment (Article 3 of the ECHR). Corporal punishment is a form of physical abuse.

4.3 Psychological Abuse

Emotional/psychological abuse is "persistent emotional mistreatment that affects a child's emotional or psychological development. It may include restricting movement, demeaning behaviour, humiliation, intimidation (including cyberbullying), threats, instilling fear, discrimination, ridicule, and other non-physical forms of hostile and rejecting treatment" (Council of Europe, 2024, p. 7). The Istanbul Convention (Council of Europe, 2011) also recognizes that children may be victims, either directly or as witnesses, of emotional/psychological forms of abuse or gender-based violence within the family environment.

4.4 Neglect

Neglect "includes the failure to provide [a vulnerable athlete] with an adequate level of nutrition, medical care, clothing, housing, or supervision, to the extent that the [athlete's] health or development is significantly affected or seriously endangered. A [vulnerable adult athlete] is neglected if left without care for extended periods or abandoned" (IOC Consensus Statement, forthcoming, cited in Council of Europe, 2024, p. 11). Neglect takes at least four forms: physical, educational, emotional, and medical (Council of Europe, 2024, p. 11). "Physical neglect refers to the failure to meet a child's basic needs (i.e. clothing, food, and shelter) or to inadequate supervision of a child that threatens their safety. Educational neglect occurs when a child is not provided with recommended education. Emotional neglect refers to situations in which a child is not nurtured or motivated and includes behaviours that ignore, humiliate, intimidate, or isolate. Medical neglect occurs when healthcare is not provided to a child or when a child's health is ignored. This extends to dental care as well. In sport, neglect may include exposing athletes to extreme cold or heat without ensuring adequate clothing or hydration, urging athletes to play despite injury, failure to follow sports safety rules or provide appropriate equipment, removing a child from education or restricting education in favour of training, and denying access to appropriate medical care for injuries" (Lang & Purdy, 2023, cited in Council of Europe, 2024, p. 11).

4.5 Bullying

Bullying is "...unwanted, aggressive behaviour among school-aged children that involves a real or perceived power imbalance. The behaviour is repeated, or has the potential to be repeated, over time. ... Bullying can include physical violence, sexual violence, threats, taunting, social exclusion, or other psychological violence" (Council of Europe, 2024a, cited in Council of Europe, 2024). It can occur online (i.e. cyberbullying) and/or in person and can be verbal and/or non-verbal.

4.6 Institutional Abuse

Practices or a culture within an organization that harm children:

- Excessive early sports specialization
- Unhealthy dietary regimes
- Exclusion or stigmatization of athletes
- Structural power imbalances

5. Incident Reporting Procedure

5.1 Safeguarding Officer

SAFE SPORT LTD appoints one (1) Safeguarding Officer (for minors and adults) who:

- is the first point of contact for all concerns or reports or requests for clarifications relating to safeguarding, with particular emphasis on children (minors),
- has received specialized training in welfare and protection (safeguarding, safe sport, athlete welfare, child protection),
- keeps confidential records of all reports,
- cooperates with competent authorities when it is mandated or when it is essential, and
- submits an annual report to the organization's Management

5.2 Reporting Steps

Any person who suspects or witnesses or receives a disclosure of child abuse is required to:

1. Remain calm and avoid exposing the child to additional risk
2. Listen to the child without asking any probing questions
3. Inform the organization's Safeguarding Officer immediately – within 24 hours
4. Complete the official Incident Report Form (Appendix)
5. Maintain strict confidentiality (does not inform the potential perpetrator)
6. Fully cooperate with every official competent authority

How to respond to any form of abuse (i.e. of a minor)

- Stay calm and do not show distress or disapproval.
- Listen carefully to what the child is saying.
- Reassure the child that their decision to speak was the right one and emphasize that what happened was not their fault.
- Tell the child that what happened to them should never have happened.
- Let the child freely recall what they want to say.
- Only ask questions to clarify something you may not have understood.
- Use open-ended questions that allow the child to unfold their own narrative about their experience. If you need to repeat a question for clarification, clearly and specifically explain why you are asking again. Otherwise, the child may believe you want them to change what they have already said.
- Acknowledge the trust the child has placed in you by disclosing this to you.
- Record in detail what the child says.
- Avoid making promises you may not be able to keep, such as keeping what the child says secret.
- Assess whether the child is at immediate risk of further sexual abuse and/or needs immediate care.
- Tell the child what you are going to do next. Provide information about other sources of help, such as child helplines.
- Pass on the report to the Safeguarding Officer of the organisation. If that person is not available, ensure that you pass the information to institutional bodies able to take action to investigate the allegations and guarantee the child's safety. Follow their advice regarding who should contact the child's parents.

5.3 Mandatory Reporting to Authorities

In case a child is at immediate risk, the Safeguarding Officer or any other staff member must immediately contact:

- The Cyprus Police: 112 (emergency) and 22808442 (for cases of child sexual abuse — disclosure, incident, or concern).

5.4 Confidentiality and Protection of the Reporting Person

SAFE SPORT LTD ensures that:

- Every report is handled with full confidentiality
- The identity of the reporting person is, as much as possible, fully protected

- Reports made in bad faith or with malicious intent may result in disciplinary action, including the potential termination of the individual's relationship with SAFE SPORT LTD

6. Safe Prevention Measures

6.1 Recruitment and Staff Selection

SAFE SPORT LTD applies robust selection procedures for everyone who works or volunteers with the organisation, particularly in roles in contact with minors:

- Clean Criminal Record Certificate
- Certificate of exclusion from the sexual offences list
- Two (2) written references
- Structured recruitment interview which includes questions relevant to child safeguarding
- Probationary period with mentoring from experienced staff

6.2 Training and Professional Development

The organization is committed to providing training on safeguarding matters:

- Induction training for all new staff and volunteers
- Annual refresher training for existing staff
- Specialized training for the Safeguarding Officer and the organization's Management
- Awareness and basic safeguarding seminars for parents/guardians
- Awareness safeguarding programmes for children and young people, as well as anyone else involved in safeguarding

6.3 Code of Conduct

Everyone representing Safe Sport Ltd is bound by the Code of Conduct, which includes:

- Zero tolerance against any form of abuse or neglect (with emphasis on children)
- Prohibition of physical contact without informed consent
- Requirement for the presence of a second adult during transport or individual contact with a child
- Prohibition of private communication (texts, social media) with children outside official channels
- Safeguarding of sensitive photographs and videos in accordance with data protection law
- Respect for individuals' personal needs, sense of dignity, and boundaries (with particular emphasis on every child)

6.4 Safe Environment

- Risk assessment of all facilities and venues used for training or to carry out any activities
- Conducting meetings with children in visible spaces
- Distinctive signage in areas where children are trained
- Regular safety inspections of facilities

7. Data Protection

SAFE SPORT LTD strictly complies with EU Regulation 2016/679 (GDPR) when processing personal data, with extra caution on data relating to minors:

- We collect only the data necessary for our operations
- Written parental/guardian consent is required for the processing of a minor's data
- Data from abuse reports are kept with confidentiality in a locked system
- Access to sensitive data concerning children is restricted exclusively to authorized staff

- Photographs and videos of minors are not published without the written permission of a parent/guardian
- We apply the right to erasure of data if requested

8. Implementation, Monitoring, and Evaluation

8.1 Responsibilities

The organization's Management bears overall responsibility for:

- Approving and regularly reviewing this Policy
- Ensuring adequate resources for its implementation
- Monitoring effectiveness through annual reports from the Safeguarding Officer
- Managing complaints

8.2 Monitoring Indicators (Key Performance Indicators – KPIs)

The organization monitors the following indicators:

- Number of trained staff/volunteers per year
- Number of reports and outcomes of case management
- Staff compliance rate with safeguarding procedures
- Satisfaction level of parents/guardians, children, and any other person involved in safeguarding
- Number of partner sport and other organizations that adopted similar safeguarding policies

8.3 Policy Review

This Policy is reviewed:

- Annually by the organization's Management
- When there are changes to the legal framework, or when deemed necessary following a recommendation from the organization's Safeguarding Officer or other experts or external evaluators

9. Complaints and Appeals Procedure

Every child (minor), parent/legal guardian, or any other person who expresses concerns regarding a child's safety or the way a report was handled is entitled to:

1. Submit a written complaint to the Safeguarding Officer, Mr. Ioannis Kountouris (e-mail: yiannis@safesport.org.cy)
2. Receive a written response within 10 working days
3. Request a review from the organization's Management if not satisfied (e-mail: marios@safesport.org.cy)
4. Refer the matter to the Cyprus Commissioner for Personal Data Protection

The organization is committed to ensuring that no complaint submitted in good faith will result in adverse treatment of the complainant.

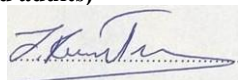
10. Communication and Awareness

This policy is:

- Published on the organization's website: www.safesport.org.cy
- Distributed to all staff, volunteers, and partner organizations
- Presented during induction training for new members
- Communicated to the parents/guardians whenever children are involved in any activity of the organization
- Included in the organization's annual activity reports

11. Approval

This Safeguarding Policy was approved by the Management of SAFE SPORT Ltd and takes effect from the date of signing.

Director, SAFE SPORT LTD Signature:  Date: 23/06/2026	Safeguarding Officer (minors and adults) Signature:  Date: 23/06/2026
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12. Statement of Commitment

I, the undersigned,, holder of Identity Card No., hereby declare that I have read and understood, and agree to comply with, the SAFE SPORT LTD Policy and Procedures for Safeguarding of Individuals (children and adults), as well as the Codes of Conduct.

Signature:

Date:

Appendix

A. Key Contacts

Service	Contact	Availability
Cyprus Police (emergency and child sexual abuse reporting)	112 / +357 22808442	24/7
Help4Uproject	https://www.help4u-project.eu/	24/7
Safeguarding Officer – Mr Ioannis Kountouris	yiannis@safesport.org.cy	Business hours
Organization Website	www.safesport.org.cy	-

B. Reporting Forms

1. Report Form for Child Sexual Abuse (Disclosure)

Complainant:**First Name:****Last Name:****Position/Role:****Contact Tel.:****Victim:****First Name:****Last Name:**

Names and surnames of Parents/Legal Guardians:

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Home Address:**Telephone No.:****Describe in the box below what the victim disclosed to you:**

Signature:

Date:

** This form is to be handed in person to the Police*

2. Reporting Form for Suspicion (Incident or Concern) of Child Sexual Abuse

Complainant:**First Name:****Last Name:****Position/Role:****Contact Tel.:****Victim:****First Name:****Last Name:**

Names and surnames of Parents/Legal Guardians:

.....

Home Address:**Telephone No.:****Describe in the box below any information or signs of sexual abuse you identified/recognized in the child:**

Signature:

Date:

** This form is to be handed in person to the Police*

3. Report Form for Other Forms of Child Abuse or Concern

Complainant:**First Name:****Last Name:****Position/Role:****Contact Tel.:****Victim:****First Name:****Last Name:**

Names and surnames of Parents/Legal Guardians:

.....

Home Address:**Telephone No.:**

Describe in the box below what the child disclosed to you, or the incident you witnessed, or any concerns you may have:

Signature:

Date:

** This form is to be submitted to Mr Ioannis Kountouris, Safeguarding Officer of SAFE SPORT LTD (email: yiannis@safesport.org.cy, tel: +357 22317239)*

4. Report of Adults' Abuse or Concern

Complainant:**First Name:****Last Name:****Position/Role:****Contact Tel.:****Victim:****First Name:****Last Name:****Home Address:****Telephone No.:****Describe in the box below the incident or what you witnessed, or any concerns you may have:**

Signature:

Date:

** This form is to be submitted to Mr Ioannis Kountouris, Safeguarding Officer of SAFE SPORT LTD (email: yiannis@safesport.org.cy, tel: +357 22317239)*