St Jeanne Antide Foundation

St Jeanne Antide Foundation
CHILD PROTECTION POLICY

SJAF – Oct 2026

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Code	Change Originator / Owner	Version / Effective Date	Changes Done	Approver
1.20	Melanie Piscopo	Oct 2026	Initial issue of a dedicated Child Protection Policy, aligned with SJAF Safeguarding Policy 1.10, applicable Maltese legislation and international child safeguarding standards.	To be Approved by Board

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1.0 Purpose

The St Jeanne Antide Foundation (SJAF) is committed to protecting children from abuse, neglect, exploitation and other forms of harm while promoting their dignity, rights, safety and wellbeing.

This policy establishes child-specific requirements across SJAF services, projects and activities, including where concerns arise through work with parents, caregivers or other adults. It promotes safe practice, prevention, appropriate recognition and reporting, children's participation, and compliance with Maltese law and applicable safeguarding standards.

This policy complements SJAF Safeguarding Policy 1.10 and does not require anyone to undertake professional assessment or investigation outside their assigned responsibilities and competence.

2.0 Policy Application

This policy applies to Governing Board members, employees, volunteers and peer mentors, students, interns, trainees, contractors, consultants, external facilitators and other authorised persons acting on behalf of SJAF.

It applies whenever their SJAF duties involve children or they receive information suggesting a child may be at risk, including through community social work, SOAR, IVY, learning support, mentoring, family support, outreach and online activities. Requirements are proportionate to roles, access, competence and statutory duties.

3.0 Policy Statement

SJAF adopts a zero-tolerance approach to child abuse, neglect, exploitation and deliberate child safeguarding misconduct. All children have the right to dignity, respect, protection from harm and appropriate consideration of their views.

SJAF shall take concerns seriously; prioritise immediate safety; maintain boundaries; apply safer recruitment and statutory vetting; provide role-appropriate induction; comply with reporting obligations; cooperate with authorities; and prevent further harm. Retaliation against good-faith reporters is prohibited.

4.0 Relationship with SJAF Safeguarding Policy (1.10)

This is a standalone child-specific policy within SJAF's wider safeguarding framework. It shall be read with SJAF Safeguarding Policy 1.10 (V3), which governs safeguarding roles, reporting, safe conduct, confidentiality, training and monitoring.

The reporting flowchart, indicators of abuse, Code of Conduct and Safeguarding Concern Reporting Form in the four annexes to Policy 1.10 also apply to child protection concerns. Where this policy establishes a more protective child-specific requirement consistent with law, it applies; mandatory Maltese law always prevails.

5.0 Legislative and Safeguarding Framework

Relevant law includes the Minor Protection (Alternative Care) Act (Cap. 602), subject to provisions in force; Protection of Minors (Registration) Act (Cap. 518); Criminal Code (Cap. 9); Gender-Based Violence and Domestic Violence Act (Cap. 581); Data Protection Act (Cap. 586); GDPR; and applicable Social Care Standards Authority requirements.

SJAF also has regard to the UN Convention on the Rights of the Child, relevant international child safeguarding standards and the Safeguarding Policy of the Church in Malta and Gozo (2024), which SJAF adopted. SJAF's independent legal personality and obligations under Maltese law remain unaffected by adoption of the Church framework.

6.0 Definitions

6.1 Child or Minor

A person under eighteen (18) years of age.

6.2 Child Protection

Measures to prevent and respond to abuse, neglect, exploitation and harm affecting individual children; part of wider safeguarding.

6.3 Child Safeguarding Concern

A disclosure, observation, allegation, report or circumstance giving reasonable grounds to believe a child has experienced, is experiencing or may be at risk of harm. Proof is not required before reporting.

6.4 Child Abuse

Physical, sexual, emotional or psychological abuse, neglect, exploitation, grooming, online abuse or other conduct causing or risking harm.

6.5 Neglect

Failure to meet essential care, protection or developmental needs resulting in or risking harm, whether a single serious omission or a pattern of failures. Poverty alone is not evidence of parental neglect.

6.6 Grooming

Behaviour establishing trust, dependency, secrecy or influence over a child for abuse or exploitation, including online.

6.7 Child Protection Referral

Communication of a child protection concern to a competent statutory authority in accordance with legal and professional requirements.

6.8 Person in a Position of Trust

A person whose role, authority or relationship gives them trust or influence over a child, including relevant SJAF personnel.

7.0 Child Protection Principles

7.1 Best Interests

The child's best interests shall be a primary consideration in decisions affecting their safety and wellbeing.

7.2 Children's Participation

Children shall be listened to in an age-appropriate and accessible manner, and their views shall be considered in decisions affecting their safety and wellbeing, without transferring safeguarding responsibility to them.

SJAF shall endeavour to ensure that children and their parents or caregivers understand their right to safety, the conduct they may expect from SJAF personnel and how they can raise concerns or complaints. Information shall be communicated in a manner appropriate to the child's age, understanding and communication needs.

7.3 Non-Discrimination

Safeguards apply regardless of disability, gender, nationality, family circumstances, religion or socioeconomic situation.

7.4 Child-Sensitive and Trauma-Informed Practice

Respond respectfully, sensitively and without unnecessary questioning or actions causing further distress.

7.5 Family Support and Proportionality

Support family capacity; do not equate poverty, disability or mental health difficulties with abuse. Prioritise safety where risk exists.

7.6 Confidentiality

Handle children's information lawfully and confidentially, without obstructing protective action or statutory reporting.

8.0 Governance, Roles and Responsibilities

The roles and reporting arrangements under Policy 1.10 Section 7 apply.

8.1 Governing Board

Oversees arrangements, approves policy and considers serious organisational concerns; does not conduct professional investigations merely by virtue of its governance role.

8.2 Executive Director / Safeguarding Lead

Oversees implementation; acts as principal internal contact; ensures appropriate escalation and referral; coordinates with authorities and, where applicable, the Church Safeguarding Commission; considers protective measures and informs the Board of material matters. The Executive Director need not personally perform every professional assessment or referral.

8.3 Social Workers and Relevant Professionals

Recognise concerns; assess within competence; comply with direct reporting obligations; record decisions; coordinate with specialist services; and consider risks to children in family interventions.

8.4 Volunteers, Peer Mentors and Other Personnel

Maintain boundaries, listen appropriately, promptly report concerns and follow role-specific instructions. Do not independently investigate, interview children to establish facts or conduct professional child protection assessments.

9.0 Prevention and Safe Working Practices

The safe-conduct and recruitment provisions of Policy 1.10 Section 8 and relevant operational procedures apply.

9.1 Safer Recruitment and POMA Verification

SJAF applies its Safer Recruitment Policy and applicable requirements under Cap. 518. Employees and volunteers sign the established POMA declaration authorising SJAF's relevant register checks. Any statutory clearance required for a role must be satisfied before commencing those duties. POMA verification does not replace supervision or safe practice.

9.2 Supervision and Boundaries

Provide safeguards proportionate to children's age, needs and identified risks. Avoid secrecy, dependency and inappropriate relationships. Legitimate one-to-one support may proceed with appropriate professional and organisational safeguards.

9.3 Physical Contact

Contact must be appropriate to the role, child's age, needs and circumstances. Physical punishment, degrading treatment, sexualised contact and inappropriate restraint are prohibited. Immediate protective action remains subject to law.

9.4 Digital Communication and Images

Do not establish unauthorised private social-media relationships or secret/dependent communication with children. Collect, use and share photographs, recordings and information only under applicable consent, safeguarding and data-protection requirements.

9.5 Activities, Projects and External Settings

SJAF shall consider child safeguarding risks when planning and implementing activities, projects and services involving or affecting children. This includes consideration of supervision, accessibility, transport, venues, digital engagement, external facilitators, emergency arrangements and potential risks arising from the design or delivery of activities.

Safeguarding considerations shall be incorporated into existing organisational and activity-specific risk assessment processes, proportionate to the nature and level of risk. Separate assessments are not required for routine activities where appropriate safeguards are already established, unless circumstances or identified risks warrant further assessment.

Where SJAF collaborates with external organisations or facilitators, relevant safeguarding responsibilities, expected conduct and reporting arrangements shall be communicated and agreed as appropriate to the activity or partnership.

10.0 Child Protection During Service Delivery

10.1 Community Social Work and Family Support

Consider children's wellbeing during holistic family assessment. Poverty, disability, mental health conditions or social assistance alone do not establish abuse or neglect. Follow professional and statutory procedures when concerns arise.

10.2 Children Affected by Domestic Violence

Consider children's exposure to coercive control, threats and violence. Do not expect children to mediate or manage family safety. Appropriate professionals undertake necessary referrals and safety planning.

10.3 SOAR and Survivor-Led Services

Peer mentors listen, respond and report within their role; they do not independently contact alleged perpetrators, investigate or question children to establish facts.

10.4 IVY, Youth Activities and Learning Support

Maintain safe participation and boundaries. Do not pressure children to disclose personal abuse in group activities. Respond sensitively to any spontaneous disclosure and report appropriately.

10.5 Children with Disabilities or Additional Needs

Adapt communication and support reasonably to children's needs. Disability or communication difficulties do not reduce the importance of safeguarding concerns.

11.0 Recognising and Responding to Concerns

Policy 1.10 Sections 9 and 10 apply. Follow RECOGNISE → RESPOND → RECORD → REPORT.

11.1 Recognise

Concerns may arise through disclosure, observation, third-party information, incidents, inappropriate conduct or family work. Proof is not required.

11.2 Respond

Listen calmly; take the child seriously; avoid leading or repeated investigative questions; reassure the child that speaking up was appropriate; do not promise secrecy or outcomes; explain necessary sharing in age-appropriate language; and report promptly. Do not confront the alleged person causing harm.

11.3 Immediate Danger

Seek emergency or statutory assistance without waiting for internal authorisation where a child is in immediate or serious danger. Then report internally and record.

11.4 Record

Record factual information promptly, using the child's words where possible and distinguishing observations, allegations, third-party reports and professional opinion. Use Policy 1.10's form or an adequate authorised case record without duplication.

12.0 Reporting and Referral

12.1 Internal Reporting

Normally report to the Executive Director / Safeguarding Lead; if implicated, the Governing Board Chairperson; if the Chairperson is implicated, another appropriate Board member and/or competent external authority. Internal reporting must not delay emergency or statutory action.

12.2 Statutory Reporting

Persons and organisations subject to a statutory reporting duty must report to the competent authority within applicable legal requirements. Informing the Executive Director does not discharge an individual's direct legal duty. Cooperate with child protection authorities and Police. Do not await proof or internal investigation. Apply the operative provisions and commencement status of Cap. 602.

SJAF shall maintain an accessible and updated directory of relevant statutory child protection authorities, emergency services and specialist safeguarding contacts for use by personnel when required.

12.3 Concerns Involving SJAF Personnel

Report under Policy 1.10. Consider proportionate precautionary measures without treating allegations as findings. Apply relevant employment law and procedures.

12.4 Church Safeguarding Commission

Where the adopted Church safeguarding arrangements apply, ensure required notification or consultation with the Commission. This supplements and never delays statutory reporting.

12.5 Parents and Guardians

Ordinarily involve parents or guardians where appropriate, but do not automatically disclose where this could increase risk, compromise investigation, invite retaliation or conflict with authority directions. Seek professional/statutory guidance when uncertain.

13.0 Confidentiality, Consent and Records

Policy 1.10 Section 11 applies. Handle children's information securely on a need-to-know basis; obtain consent where legally required, but do not treat consent as a precondition for a mandatory report or other lawful protective disclosure. Inform children appropriately where practicable. Use authorised SJAF records and retention rules.

14.0 Training, Monitoring and Quality Assurance

The provisions of SJAF Safeguarding Policy 1.10, Section 12, apply.

SJAF shall provide safeguarding induction and role-appropriate training to personnel, including guidance on recognising concerns, responding to disclosures, maintaining professional boundaries and following reporting procedures. Relevant training shall be recorded through existing personnel records.

The Executive Director shall oversee implementation of this policy and periodically review safeguarding practices, identified risks, training needs, incidents and lessons learnt.

Significant safeguarding matters and relevant organisational improvements shall be reported to the Governing Board in an appropriately confidential and proportionate manner.

Safeguarding arrangements shall be reviewed through existing organisational monitoring and quality assurance processes. SJAF shall also arrange for an independent evaluation of its child safeguarding measures at least every three years, proportionate to the Foundation's operations and available resources.

Findings and recommendations arising from safeguarding reviews and evaluations shall be documented, considered by the Executive Director and, where appropriate, presented to the Governing Board. Agreed improvements shall be incorporated into relevant policies, procedures and working practices.

15.0 Non-Compliance and Protection from Retaliation

Breaches may lead to proportionate organisational action under SJAF procedures. Deliberate concealment, obstruction, retaliation and abusive conduct may constitute serious misconduct. Protect good-faith reporters; treat subjects of allegations fairly and without presuming wrongdoing.

16.0 Policy Review

Review at least every two years or earlier following legal or SCSA changes, changes in the adopted Church framework, significant incidents, learning or changes to SJAF activities. The Executive Director coordinates review; material amendments require Governing Board approval.

17.0 References and Cross-Referenced Policies

17.1 External References

- Minor Protection (Alternative Care) Act, Cap. 602
- Protection of Minors (Registration) Act, Cap. 518
- Criminal Code, Cap. 9
- Gender-Based Violence and Domestic Violence Act, Cap. 581
- Data Protection Act, Cap. 586 and GDPR
- UN Convention on the Rights of the Child
- Safeguarding Policy of the Church in Malta and Gozo (2024)
- Applicable Social Care Standards Authority (SCSA) standards.
- Keeping Children Safe – International Child Safeguarding Standards (2024).

17.2 SJAF Policies and Procedures

- SJAF Safeguarding Policy 1.10 (V3), including four annexes
- Safer Recruitment Policy 3.2
- Service Intake and Referrals Procedures 1.07
- Case Management and Closure Policy 1.07.01
- Drop-In Guidelines 1.17v6
- Feedback and Complaints Policy 1.04v2
- Data Protection Policy 1.02v3
- Confidentiality & Privacy Policy 1.01
- Health and Safety arrangements 2.1
- Employee and Volunteer Handbooks 3.01.1/3.04.1
- Applicable SOAR, IVY, learning support and service-specific procedures

References are to current approved versions of applicable documents.

18.0 Annexes and Operational Tools

Use the four annexes to Policy 1.10: Safeguarding Reporting Flowchart; Recognising Possible Indicators of Abuse and Harm; Safeguarding Code of Conduct; and Safeguarding Concern Reporting Form. Do not create duplicate forms, codes or acknowledgements where existing approved arrangements suffice.

Version-Control Description

Initial development of a dedicated Child Protection Policy complementing SJAF Safeguarding Policy 1.10, addressing applicable Maltese child protection legislation, the Safeguarding Policy of the Church in Malta and Gozo (2024), and child-specific safeguarding requirements across SJAF services and activities.