



Fe y Alegría

Movimiento de Educación Popular Integral

PERÚ

To Care Is Also to Educate

Organizational Policy on
the Protection of Children
and Adolescents of
Fe y Alegría Peru



Coordination for Identity and Mission

To Care Is Also to Educate

Organizational Policy on the Protection of Children and Adolescents
of Fe y Alegría Peru

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Acronyms

Alegra	Free Legal Aid Center
CEAS	Episcopal Commission for Social Action
CEM	Women's Emergency Center
CIFHS	Committee for Intervention against Sexual Harassment
CUL	Single Employment Certificate
Demuna	Municipal Ombudsman's Office for Children and Adolescents
DNI	National Identity Document
Infant	Training Institute for Working Adolescents and Children
Mamis	Child Maltreatment Care Modules in Health Services
MASI	Child sexual abuse material (CSAM)
MIMP	Ministry of Women and Vulnerable Populations
Minedu	Ministry of Education
Mininter	Ministry of the Interior
Minjurdh	Ministry of Justice and Human Rights
Minsa	Ministry of Health
MPFN	Public Prosecutor's Office – Office of the Attorney General
NNA	Children and adolescents
NNATS	Working children and adolescents
ONG	Non-governmental organization (NGO)
ONU	United Nations (UN)
PNP	Peruvian National Police
POA	Plan operativo anual
PPONA	Organizational Policy on the Protection of Children and Adolescents
S.J.	Society of Jesus
Sunedu	National Superintendence of Higher University Education
UPE	Special Protection Unit

Acronyms are given in their original Spanish form, as used in Peru.

Foreword

Dear staff members, allies and volunteers of Fe y Alegría Peru,

We are pleased to present a new version of our institution's Organizational Policy on the Protection of Children and Adolescents, a fundamental step in our mission to ensure the well-being and integrity of the children and adolescents who are part of our educational community.

At Fe y Alegría, we understand that education and care are two inseparable components of our students' holistic formation. The COVID-19 pandemic forcefully reminded us that, in order to educate, we must first care. This means Protection not only physical and emotional health, but also the safety and rights of children and adolescents in every space in which they interact with us.

Since its beginnings, Fe y Alegría has been defined by its commitment to popular education and social development, grounding its work in a holistic education that promotes the respect, dignity and human rights of every individual. This new version builds on the policy currently in force and is aligned with international standards such as those developed by Keeping Children Safe.

This Policy incorporates further components and aims to provide the guidance needed to prevent, detect and respond to any situation that puts the integrity of children and adolescents at risk in our institutions, thereby ensuring that all our staff, volunteers and allies are prepared for, and committed to, its implementation. It also highlights the importance of active collaboration among all members of our community in creating a safe and protective environment for our students.

This Policy sets out the specific actions we must take to protect children and adolescents, including preventive measures, the proper handling of reports and the strengthening of teamwork in situations involving violations of their rights. It likewise reinforces the roles and responsibilities of everyone involved, ensuring that no one stands apart from this task.

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Finally, we invite you to read the OPPCA carefully, as its implementation is essential to ensuring that Fe y Alegría Peru remains a safe and dignified place for all our students, with the firm purpose of fulfilling our educational mission with respect and responsibility.

Thank you for your commitment to this cause.

Ernesto Cavassa Canessa, S.J.
Executive Director
Fe y Alegría Peru



1 Introduction

The Organizational Policy on the Protection of Children and Adolescents (OPPCA, by its Spanish acronym) sets out the guidelines and procedures that govern our actions in preventing, responding to and resolving situations of maltreatment, violence or abuse of children and adolescents in all the spaces in which the National Office of Fe y Alegría carries out activities. It is therefore a policy that reflects our responsibility as a socially committed institution and is aligned with Peruvian law and international standards on children's rights.

The purpose of this Policy is to strengthen the capacities of our staff, allies, volunteers and members of the educational community, so as to ensure that every person who interacts with the children and adolescents in our care clearly understands their role in Protection their well-being and integrity.

It also sets out guidelines for implementing preventive measures, properly handling reports and responding effectively to any situation that may put children and adolescents at risk, thereby providing them with a safe space in which they can develop, learn and grow without fear of maltreatment or violence.

With the collaboration of all its members, Fe y Alegría Peru undertakes to apply this protocol to the highest ethical and professional standards. This way, it ensures that our organization is a benchmark for the protection of children and adolescents in the country.

The commitment of each one of us is essential to creating a responsible educational and social environment in which the integrity, safety and rights of children and adolescents are always our priority.

1.1. Principles

Fe y Alegría's OPPCA is grounded in: the Keeping Children Safe standards; the 1989 United Nations (UN) Convention on the Rights of the Child and its Optional Protocols; Peru's Code on Children and Adolescents (Law No. 27337); Legislative Decree No. 1323 on protection against family violence and gender-based violence; and other national regulatory frameworks relating to the protection of children and adolescents.

It is also inspired by the mission, vision and institutional values of Fe y Alegría Peru, by the principles established by the International Federation of Fe y Alegría and by the ethical commitment to guarantee safe, violence-free environments for all the children and adolescents with whom it interacts.

Within this framework, Fe y Alegría Peru operates on the basis of the following principles:

1. All children and adolescents have the right to grow up in a safe environment that respects their dignity and is free from all forms of maltreatment, violence, abuse or exploitation.
2. All individuals and organizations associated with Fe y Alegría Peru share responsibility for ensuring the protection of children and adolescents, by fostering environments that prioritize their well-being and holistic development.
3. Fe y Alegría Peru has a duty to act diligently to protect children and adolescents in every space in which it carries out activities, ensuring that they suffer no harm as a result of its work or of the operations of its staff, volunteers and partners.
4. The best interests of the child and the adolescent shall always be the guiding principle for all Protection decisions and actions within the organization.

5. The OPPCA must be known, understood and applied by everyone who works for, or is associated with, Fe y Alegría Peru, ensuring its implementation in every context in which services are provided.
6. The educational, social and community spaces in which children and adolescents live their lives must provide care, safety and opportunities for holistic growth; prevention and the early detection of risks are prioritized in these spaces.
7. Fe y Alegría Peru takes a firm institutional stance in favor of children and adolescents and condemns all forms of violence, maltreatment, neglect and abuse against them.
8. The institution recognizes the inherent vulnerability of children and adolescents and undertakes to implement proactive measures that strengthen their safety and their physical, emotional and social development.
9. Fe y Alegría Peru fosters environments in which every child and adolescent feels respected, safe, valued and joyful, and has a sense of belonging, in spaces designed for their well-being and free from any form of violence.
10. We recognize that all human beings are born free and equal in dignity and rights. This principle commits us to non-discrimination on grounds of ethnicity, colour, gender, language, religion, sexual orientation, political opinion, social or economic origin, disability or any other status.
11. Fe y Alegría Peru condemns all forms of physical, psychological, sexual or online violence, in whatever context it occurs, and undertakes to act rigorously and diligently in response to any report or incident brought to its attention.

1.2. Terms and definitions

1.2.1. Glossary



Adolescent: any person from the age of thirteen until their eighteenth birthday, in accordance with Peru's Code on Children and Adolescents.

Care: an immediate and appropriate response to situations of violence, aimed at ensuring the physical, emotional and social recovery of a child or adolescent, taking into account their age, gender and cultural identity.

Fe y Alegría educational center: an educational institution that forms part of the Fe y Alegría Peru network and operates in accordance with its philosophy, mission and institutional values.

Staff member: a person employed by Fe y Alegría under an employment contract to perform duties within the institution.

Commission by omission: a situation in which a person fails to act to prevent harm or an outcome that they have a legal duty to prevent under Peruvian law.

Educational community: the set of stakeholders involved in the educational process, including students, teachers, school leaders, administrative staff, mothers and fathers, and community members who collaborate for educational purposes.

Consultant: a person engaged to provide specific professional or technical services under a contract for services.

Offense: conduct defined and punishable under Peruvian law, characterized as unlawful and culpable, and subject to a criminal penalty.

Educator: within the framework of the popular education promoted by Fe y Alegría, this term includes teachers, school leaders, administrative staff, support staff and any other person who performs a formative role in educational centers.

Exploitation: the use of a child or adolescent in labor, sexual or economic activities that violate their dignity and rights; it is prohibited by the Code on Children and Adolescents and by other Peruvian regulations.

Andragogical mediation: lifelong education in which a facilitator interacts with adults to develop their reasoning, self-management and quality of life.

Minor: under Peruvian law, any person who has not yet reached the age of 18.

Child: any person from birth to the age of twelve, in accordance with Peru's Code on Children and Adolescents.

Prevention: a set of proactive measures aimed at reducing risk factors and averting acts of violence, abuse or neglect against children and adolescents before they occur.

Protection: a comprehensive and effective intervention by Fe y Alegría to ensure that children and adolescents are free from risks that compromise their safety, well-being or rights, through the application of preventive, administrative or legal measures.

Organizational Protection: the system implemented by Fe y Alegría to prevent, manage and respond promptly to situations of maltreatment, abuse or neglect within the framework of its activities, programs or projects.

Restoration of rights: measures adopted to redress the harm caused to a child or adolescent as a result of a violation of their rights, ensuring their rehabilitation and the restoration of their well-being.

Attempt: an act carried out with the purpose of committing an offense, the execution of which has begun but is not completed for reasons beyond the perpetrator's control, in accordance with Peruvian law.

Violence: any act or omission that causes physical, sexual, psychological, emotional or financial harm and limits a person's well-being or rights, in accordance with the Peruvian legal framework and international standards.

Volunteer: a person who provides unpaid or temporary services in Fe y Alegría activities without a formal employment contract with the organization.

1.2.2. Types of violence

Child maltreatment

Actual or potential physical, psychological or emotional harm resulting from an act or omission that violates the rights of children and adolescents and affects their health, holistic development or dignity; it can take various forms, including neglect, abandonment or abuse.

Violence against life

- **Homicide:** the act of intentionally causing the death of a person, as defined by the Peruvian Penal Code.
- **Negligent homicide:** loss of life caused by negligence, recklessness or failure to fulfill one's duties.

Sexual violence

- **Rape:** vaginal, anal or oral penetration by means of force, threat or coercion, or taking advantage of the victim's vulnerability, such as a lack of volitional or cognitive capacity.

- **Indecent assault:** a situation in which a person, without the intention of performing a sexual act or an analogous act, uses violence or serious threat to commit an act against the sexual modesty of another person.
- **Sexual harassment:** an unwanted comment, insinuation or gesture of a sexual nature directed at a child or adolescent that causes intimidation or discomfort.
- **Exhibitionism:** performing sexual acts in front of children or adolescents or exposing the sexual organs for lewd purposes.
- **Child sexual abuse material (CSAM):** any act involving the creation, distribution or possession of material depicting children or adolescents in sexual contexts.
- **Trafficking in persons for sexual exploitation:** the recruitment, transfer or exploitation of children and adolescents for sexual purposes.

Physical violence

- **Physical assault:** the act of attacking another person through the use of force or of objects that cause bodily harm, such as blows, shoving or wounds.
- **Corporal punishment:** the use of force as a method of discipline which, even if it causes no visible injury, affects a child or adolescent emotionally or physically.
- **Abandonment:** an act that negatively affects the self-esteem and emotional stability of a child or adolescent, such as humiliation, insults, discrimination, threats or emotional neglect.

Psychological or emotional violence

- **Emotional abuse:** an act that negatively affects the self-esteem and emotional stability of a child or adolescent, such as humiliation, insults, discrimination, threats or emotional neglect.

- **Discrimination:** any distinction, exclusion or preference based on race, gender, religion, disability, economic status or other characteristics that impairs the full enjoyment of the rights of children and adolescents, in accordance with article 323 of the Penal Code.

Online violence

- **Cyberbullying:** the use of technology to harass, intimidate, humiliate or threaten a child or adolescent through messages, posts or content shared on social media, digital platforms or personal digital spaces, such as WhatsApp accounts, email, Facebook, etc.
- **Violation of sexual privacy:** acts such as capturing, disseminating or storing images, videos or communications of an intimate nature, with or without the consent of the child or adolescent.

Exploitation and child labor

- **Sexual exploitation:** the use of children and adolescents in sexual activities for profit or for any other purpose, in accordance with article 176 of the Penal Code.
- **Child labor:** work performed by children and adolescents that endangers their physical, emotional or educational development; it is prohibited by the Code on Children and Adolescents and regulated by Supreme Decree No. 003-2010MIMDES.

Situation of risk

A condition that creates risks to the integrity or well-being of children and adolescents, even where it causes no direct physical harm.

The following are situations of risk:

- **Carrying weapons:** bringing or possessing firearms or bladed weapons in educational spaces.
- **Possession of illicit substances:** the possession, distribution or use of drugs in educational spaces.

Other forms of violence

- **Bullying:** a form of repeated violence among peers intended to humiliate or intimidate the victim; it may be verbal, physical, emotional, sexual or online.
- **Spiritual abuse:** the misuse of religious or spiritual beliefs to control, coerce or subjugate a child or adolescent, affecting their dignity and well-being.
- **Revictimization:** re-exposing a child or adolescent to processes or situations that cause them to relive the initial trauma or harm, whether through institutional negligence or poor case handling.

1.2.3. Persons involved in violent acts or incidents

Perpetrator or aggressor in a violent act

Those directly responsible for acts of violence are:

- A person who, intentionally or through negligence, commits an act of violence against a child or adolescent.
- A person who induces, compels or forces another person to commit an act of violence.
- A person who cooperates in the commission of a violent act by performing actions without which the act could not have been carried out.

Accomplice

A person who:

- Encourages, incites and/or urges another person to commit an act of violence.
- Offers help or cooperation after the violent act has been committed in order to conceal it.
- Conceals, hides or prevents the reporting of a violent act, thereby contributing to its impunity.

Victim, aggrieved person or person whose rights have been violated

The person against whom the act of violence is committed and who suffers the harm or violation of rights. In the case of children and adolescents, these rights are considered legal interests that receive special protection under the Peruvian Penal Code and the Code on Children and Adolescents.

1.2.4. Differences between an internal report and a report to the authorities

Table 1. Differences between an internal report and a report to the authorities

Aspect	Internal report	Report to the authorities
Definition	An internal communication to alert the institution to a risk, suspicion or incident affecting a child or adolescent.	A formal statement to the competent authorities regarding the alleged commission of an offense.
Purpose	To activate the institution's internal mechanisms for prevention or immediate intervention.	To request the intervention of the Public Prosecutor's Office, the Peruvian National Police (PNP) or other legal authorities.
Responsible party	Fe y Alegría personnel (staff members, volunteers, consultants, etc.) or any associated person.	The Protection focal point, the Child Protection Committee of the National Office of Fe y Alegría (hereinafter, the Child Protection Committee) or any other person, as established by law.
Legal basis	Internal: institutional policy and protocols.	External: the Peruvian Penal Code and the Code on Children and Adolescents, among other applicable regulations.
Requirements	Reasonable suspicion of a possible violation is sufficient.	Clear indications that an offense has been committed are required.
Procedimiento	An internal report to the focal point, who assesses the situation and decides on the action to be taken	Formal submission to the competent authorities, with evidence or testimony substantiating the case.
Confidentiality	Guaranteed within Fe y Alegría to protect the identity of the persons involved.	Guaranteed in accordance with legal standards, although the process may involve disclosure within the judicial system.



2 Scope

The scope of Fe y Alegría Peru's OPPCA derives from its objective of guaranteeing the comprehensive protection of the children and adolescents who take part in the programs, projects and activities of its National Office.

This scope comprises the elements set out below.

2.1.

Institutional scope of application

The OPPCA applies nationwide in all areas and communities in which the National Office of Fe y Alegría Peru carries out educational, social and pastoral activities and programs. It therefore applies to:

- The National Office and the rural networks of Fe y Alegría.
- Educational communities, in both regular and extracurricular activities organized by the National Office (retreats, day events and workshops, among others).
- Virtual or digital spaces used by the National Office of Fe y Alegría to interact with students or communities.

2.2.

Persons responsible for complying with the OPPCA

Compliance with the OPPCA is mandatory for all persons directly or indirectly associated with Fe y Alegría's activities.

This includes:

- Colaboradores y colaboradoras contratadas: administrative, technical and support personnel working under an employment contract with Fe y Alegría.
- Consultants and contractors: external persons engaged to provide professional services or carry out specific projects.
- Volunteers: persons who collaborate in activities organized by Fe y Alegría, whether occasionally or on an ongoing basis.
- Program or project liaisons: persons who manage projects funded or implemented in partnership with other organizations.
- Partners and allies: organizations, institutions or works of the Society of Jesus that collaborate with Fe y Alegría on joint projects.
- Interns and trainees: persons undertaking pre-professional or professional placements in spaces administered by Fe y Alegría.

 2.3.

Children and adolescents covered

The OPPCA protects all children and adolescents who take part in programs, activities or initiatives carried out by Fe y Alegría.

This includes:

- Students enrolled in Fe y Alegría's educational institutions.
- Participants in extracurricular activities organized by Fe y Alegría (workshops, sporting events and community-building residential activities, among others).
- Beneficiaries of social or educational projects implemented in Fe y Alegría's areas of influence

 2.4.

Conditions for implementing the OPPCA

The OPPCA also applies in any place or space in which Fe y Alegría carries out activities, both inside and outside institutional premises, so as to ensure that:

- Risk analyzes are conducted and mitigation strategies put in place before any action involving the participation of children and adolescents is carried out.
- Se realicen análisis de riesgos y estrategias de mitigación antes de ejecutar cualquier acción que involucre la participación de NNA.
- Accessible and confidential reporting mechanisms are available in all areas in which the OPPCA applies. .

2.5. The following documents form the basis of the OPPCA:

The following documents form the basis of the OPPCA:

- "Institutional Strategic Project of Fe y Alegría Peru 2022–2030"
- "Basic Policy for the Prevention of and Response to Violence Identified in Our Service Contexts" (International Federation of Fe y Alegría, Advocacy Document 16)
- "Basic Policy for the Prevention of and Response to Violence Identified in Our Service Contexts" (International Federation of Fe y Alegría, Advocacy Document 16)
- "Apostolic Plan of the Province of Peru 2022–2029"
- Peruvian Penal Code (Legislative Decree No. 635)

Other reference documents include: the 1989 UN Convention on the Rights of the Child and its protocols; the Statement of Commitment on Eliminating Sexual Exploitation and Abuse by UN and Non-UN Personnel (2006); the Political Constitution of Peru; the Code on Children and Adolescents (Law No. 27337); the Keeping Children Safe standards; the Law Establishing the National System for the Comprehensive Care of Children and Adolescents (Law No. 26518); and other binding regulations.

2.6. Approval

Fe y Alegría Peru's OPPCA was approved on 24 February 2025 in the city of Lima, with the favorable opinion of the Executive Committee of Fe y Alegría (Annex 1).



3 Prevention

Fe y Alegría Peru undertakes to ensure that all the children and adolescents with whom it works or interacts have safe spaces that foster their holistic development, free from violence and from risks that compromise their physical, emotional, sexual or psychological well-being. The OPPCA prioritizes prevention and an effective response to child maltreatment, ensuring that our activities and operations are conducted accordingly and that the personnel involved always act in favor of the protection of, and respect for, the rights of children and adolescents, and their restoration where necessary.

3.1.

Risk analysis and mitigation

Through its program managers, Fe y Alegría Peru undertakes to conduct a comprehensive analysis of the risks associated with the activities, events and processes that take place in its educational centers and institutional projects. The purpose of this analysis is to identify and prevent any form of child maltreatment or violence that may affect children and adolescents, so that effective preventive measures can be implemented.

3.1.1. Definition of risk

Whenever the word risk is used in this document of Fe y Alegría Peru, it refers to any act or omission resulting from recklessness, negligence or lack of skill that could lead to child maltreatment, violence or any other violation of the rights of the children and adolescents who take part in its activities. This includes, but is not limited to, situations that affect their physical, emotional, psychological, social and educational well-being.

It should be stressed that, in this context, risk refers not only to direct acts of violence but also to situations that, by their nature or owing to the circumstances, may jeopardize the full exercise of the rights of children and adolescents, such as access to education, health, housing and food, among others.

3.1.2. Risk analysis procedure

The purpose of risk analysis is to identify the likelihood of a negative event occurring, in order to mitigate its impact and prevent situations that could affect the integrity of children and adolescents. To conduct this analysis effectively, both the impact and the probability of each risk must be measured.

Risk analysis must be carried out regularly in each of the departments that make up the National Office (Human Resources, Fundraising, Volunteering and others), in order to identify the specific risks in their particular contexts. To that end, this document provides the guidelines that departments need to conduct such analyzes appropriately, taking into account local, cultural and contextual factors that may influence the safety of children and adolescents.

Once the risks have been identified, each department will develop and apply mitigation strategies, safety protocols and preventive measures that address potential threats to the physical, emotional, sexual and psychological integrity of children and adolescents.

Process for applying mitigation strategies, safety protocols and preventive measures

- Risk assessment: identifying situations that may endanger the well-being of children and adolescents.
- Planning mitigation strategies: implementing preventive measures, action protocols and procedures to reduce or eliminate the risks identified.
- Strengthening Protection teams: providing ongoing training for those responsible for Protection within the educational community and updating protocols in the light of the risks detected

Risk analysis and mitigation planning will follow the format set out in Annex 2.

Risk analysis methodology

Risk analysis is based on collective reflection and brainstorming to identify all possible factors or situations that could give rise to maltreatment or violence against children and adolescents in its various forms.

3.1.3. Risk analysis

Risk analysis is conducted at five levels, as shown in Table 2.

Table 2. Levels of risk analysis

Level	Description	Participants
Level 1 Contextual risk analysis	Risks associated with the context that may endanger the protection of children and adolescents are identified, including those they face on their way to the educational institution. Anticipating environmental risks ensures that activities are planned safely and involves establishing strategic partnerships that help mitigate the risks identified.	• Activity working group • Heads of the educational center or event venue • Child Protection Committee
Level 2 Risk analysis at the educational center	Risks are identified within the premises of the educational institution, such as the school infrastructure and the relationships between children, adolescents and adults (educators, administrative staff, volunteers and external personnel who regularly take part in the center's activities).	• Activity working group • Representatives of the Child Protection Committee • Representatives of the educational center
Level 3 Risk analysis for events or activities	The risks associated with activities organized by the National Office of Fe y Alegría in which minors take part are assessed. This includes both activities planned under the annual operating plans (POA) and extraordinary or emergency activities arising from the participation of institutions outside Fe y Alegría.	• Activity working group • Representatives of the Child Protection Committee

Level	Description	Participants
Level 4 Risk analysis of programs and projects	An analysis conducted before the implementation of projects or programs proposed by the National Office of Fe y Alegría. It assesses the risks that could arise during the implementation of programs or projects in educational institutions.	• Teams in charge of the National Office's projects and programs • Child Protection Committee
Level 5 Risk analysis of stakeholders and persons in contact with children and adolescents	The risk that may arise from contact between children and adolescents and the persons who interact with them on a permanent or temporary basis — such as National Office staff, volunteers, consultants and other stakeholders involved in Fe y Alegría's projects, programs or activities — is assessed.	• Representatives of the Child Protection Committee • Project managers • Those responsible for recruiting staff or consultants

The roles of the participants mentioned in this process are set out below in section 3.6, on roles and responsibilities.

Main criteria to apply once risks have been identified

- **Impact on children and adolescents:** the consequences that the risk would have for children and adolescents if it were to materialize are assessed (Table 3). This depends on the case and is expressed in the following questions: Who is being affected? What factors put them at risk? What measures exist to reduce the risk? What consequences would the risk have for their physical, emotional and psychological development?

Table 3. Impact categories for risk assessment

Impact category	Criteria and definitions	Value
Negligible	• There is no harm and no consequences for the person's integrity are foreseen.	1
	• The risk relates to gaps in the OPPCA's internal procedures, unless the gap relates to abusive practices.	
Minor	• The consequences of physical and emotional harm can be managed through mediation and andragogical and pedagogical techniques.	2
	• The harmful conduct or abusive practice is not recurrent.	
Moderate	• The harm requires limited medical (physical and psychological) care and legal counselling for the person.	3
	• Consequences for the person are foreseen owing to the intensity and/or frequency of the harm, since it affects the person's development.	
Severe	• The harmful situation requires immediate medical (physical and psychological) care for the person.	4
	• The harm places the person's physical and psychological integrity at greater risk.	
	• The harm will have a significant impact on the person's development.	
Critical	• The harm will result in imminent death or cause severe injury to the person's integrity.	5
	• The harm or abusive practice will have a negative impact on the person's family members and wider community.	

Source: Keeping Children Safe, "Risk Analysis" (2024; brochure).

- **Probability:** refers to the likelihood that the risk will materialize (Table 4). This raises the following questions: How likely is it that the identified risk will become a reality? Is it a situation that occurs frequently, or is it rather occasional?

Table 4. Probability categories for risk assessment

Probability category	Criteria and definitions	Value
Rare	The risk is very unlikely to occur; it would arise only in exceptional circumstances.	1
Unlikely	The risk could occur at some point, but is not expected to.	2
Possible	The risk may reasonably occur.	3
Likely	The risk will probably occur in most circumstances.	4
Imminent	The risk is imminent and is certain to occur.	5

Source: Keeping Children Safe, "Risk Analysis" (2024; brochure).

- **Risk significance:** once the level of impact (the consequences the risk would have for a person or group if it became a reality) and the probability of the risk (how likely it is to occur) have been analyzed, the level of significance of the risk must be determined.

Significance levels are calculated from the values in Tables 3 and 4 using the following formula:

$$\text{Significance} = (\text{impact value}) + (\text{probability value})$$

Significance levels

- **High:** if the sum of the values is 7 or more, the risk is very likely to occur and to have a major impact. High-level risks must receive immediate attention, since their potential to cause significant harm to children and adolescents is high and they are likely to materialize quickly.
- **Medium:** if the sum of the values is between 4 and 6, the risk is very likely to occur or to have a major impact. Risks of this kind require short-term preventive measures, given their possible repercussions, even if they do not occur very frequently.
- **Low:** if the sum of the values is between 1 and 3, the risk is unlikely to occur and will not have much impact. These risks must nonetheless be monitored, although they have lower priority because of their low probability and impact.

Once the significance of the risk has been determined on the basis of its probability and impact, mitigation strategies are developed.

3.1.4. Mitigation strategies

The focal point of the National Office will be responsible for supporting the departments so that they can develop the risk mitigation strategies needed to guarantee the safety of children and adolescents in institutional activities. These strategies must be relevant to the context, feasible, sustainable and operational, so as to enable an effective reduction of risks in each area of action.

Steps for designing mitigation strategies (Annex 2)

The following process must be followed in a structured and systematic manner, so that the risks identified can be addressed efficiently.

A. Review the risk analysis

- Consult the identification of risks carried out by level, as described in the risk analysis.
- Analyze the risk-level assessment tables (Tables 3 and 4), taking into account the significance level of each risk (low, medium or high) in terms of impact and probability.

B. Assess the impact and design specific actions

- Visit the future: that is, reflect on the impact that the identified risk would have on children and adolescents if it were to materialize, asking:
 - What consequences would this risk have for the physical, emotional or social well-being of children and adolescents?
 - What immediate or long-term harm could result?
- Design specific actions to address each risk, taking into account the level of impact and probability assigned in each case.
- Assess the feasibility of the actions, considering the following aspects:
 - Human and financial resources: verify the availability of trained personnel and of the budget needed to implement the actions.
 - Sustainability of the actions: ensure that the strategies are sustainable over time and applicable in similar contexts.
 - Legality of the actions: ensure that all measures are in line with Peruvian law, such as the Penal Code, the Code on Children and Adolescents and other regulations in force.
 - Follow-up: define how the actions will be monitored to ensure their effectiveness.

C. Assess and document non-mitigable risks

- Identify any risks that, by their nature, cannot be mitigated (for example, structural or external risks).
- Classify and document these risks as non-mitigable, and explain why they cannot be controlled by the institution.

D. Establish action protocols

- Draw up specific mitigation protocols for each risk identified, setting out the steps to be followed should the risk materialize.
- Ensure that these protocols are known to everyone involved in the activity (staff, volunteers, partners, etc.).

E. Implement and evaluate the mitigation plan

- Implement the mitigation plan, the mitigation protocol or the specific actions designed for each risk.
- Evaluate the mitigation plan after implementation to measure the effectiveness of the measures adopted. This includes:
 - Identifying the results achieved.
 - Drawing conclusions that will serve as a basis for future mitigation actions.
 - Recording all information in the "Risk Analysis and Mitigation Planning" form (Annex 2), so as to ensure that lessons learned are incorporated into future processes.

3.2.

Recruitment of employed staff

Fe y Alegría Peru will ensure that its staff recruitment and selection process is comprehensive and rigorous, in order to protect the children and adolescents who take part in its activities and projects. This process will incorporate high child-Protection standards and will ensure that the candidates selected understand and commit to the OPPCA.

To this end, job descriptions will include an analysis of the level of contact with children and adolescents and of the risks associated with the post. When job descriptions are drawn up at the National Office, the following will be taken into account:

- What type and level of contact with children and adolescents does the post involve?
- Will the employee have unsupervised access to children and adolescents?
- What other types of contact will they have with children and adolescents (by telephone, internet or post)?
- What child-Protection responsibilities will the holder of each post have?

3.2.1. Staff selection criteria

The National Office establishes the following criteria for recruiting its own staff (including interns), professional service providers, development cooperation workers and volunteers:

- Job advertisements will state clearly that Fe y Alegría is an institution committed to the protection of children and adolescents that strictly applies its OPPCA (Annex 3).

- During selection, candidates' suitability will be assessed on the basis of the following required documents:
 - Original national identity document (DNI), presented at the interview.
 - Single Employment Certificate (CUL) issued by the Ministry of Labor and Employment Promotion, including verifiable employment references.
 - Professional degrees or certificates validated by the National Superintendence of Higher University Education (Sunedu) or by the Ministry of Education (Minedu).
 - Employment references, which will be confirmed by telephone and will include questions relating to child Protection.
- The selected staff member will sign a formal commitment to comply with the OPPCA and child-Protection standards (Annex 4).
- The publicly accessible social media accounts of the selected staff member, and information about them on the internet, will be reviewed. In doing so, it will be verified that candidates' posts on public platforms do not contain messages, images or conduct that could contravene the values and principles of Fe y Alegría, particularly on matters relating to children and adolescents.
- During interviews, candidates will:
 - Be informed of Fe y Alegría's commitment to child Protection and of its policy, the OPPCA.
 - Be asked specific questions about the protection of children and adolescents in order to assess their understanding, values and attitudes towards them (Annex 5).
 - Have their knowledge and previous experience in educational or childcare settings assessed, by being asked to describe relevant cases in which they handled situations relating to child Protection.

3.2.2. Engagement of professional service providers

Fe y Alegría Peru will ensure that persons engaged to provide professional services understand and respect the OPPCA guidelines. The terms of reference for each position will include clear provisions on commitment to the OPPCA and to child-Protection standards.

- **Responsibilities of project managers**

- When drafting the terms of reference, ensure that they include the child-Protection responsibilities applicable to the position.
- Conduct a risk analysis and draw up a specific mitigation plan for the contractor's involvement in activities with children and adolescents.
- Check the contractor's background using the same criteria as those established for the recruitment of employed staff

- **Induction and supervision**

- Before taking up their duties, contractors must receive an induction on the OPPCA.
- Project managers will be responsible for overseeing compliance with the OPPCA throughout the performance of the contract.

- **Action in the event of non-compliance**

- Should the contractor commit an act of maltreatment that does not constitute an offense, they will be immediately removed from their position and excluded from the activity or educational community in which Fe y Alegría operates.
- If an act constituting an offense is identified, Fe y Alegría will report it to the competent authorities and terminate the contract without liability for the institution, requiring the repayment of any advance payments where applicable.

3.2.3. Participation of volunteers

Fe y Alegría Peru welcomes volunteers who take part in institutional and educational activities. Their admission will be subject to assessment, supervision and oversight measures to guarantee the protection of children and adolescents.

- **Prerequisites before volunteering begins**

- The person in charge of volunteering will keep a volunteer file, which must include:
 - Official identification (DNI or passport).
- A letter of recommendation from, or proof of affiliation with, a volunteer organization.
- During the interview, the volunteer will be informed about the OPPCA and given a copy of it for their information.
- The volunteer must sign a formal commitment to comply with the OPPCA and child-Protection standards (Annex 4).

- **Supervision during volunteering**

- A supervisor will be designated to oversee the volunteer's activities directly and to maintain communication with the educational community in which the volunteer performs their duties.
- Should violations or breaches be detected, the volunteer will be immediately suspended and removed from the activity. If the act constitutes an offense, it will be reported to the competent authorities.

- Preventive measures

- Volunteer coordinators must analyze the risks associated with volunteer participation and design appropriate mitigation plans..
- Agreements will be established with volunteer organizations, which must guarantee the suitability of the persons sent to collaborate in Fe y Alegría's activities.

3.3.

Code of Conduct of Fe y Alegría Peru

This Code of Conduct has been designed and drawn up to protect children and adolescents in all of Fe y Alegría Peru's activities and to guide the behavior of staff members, consultants, volunteers and anyone associated with the organization, thereby ensuring clear standards of conduct with regard to the safety of minors.

Compliance with this Code of Conduct is mandatory for all staff members, consultants and volunteers, and for anyone who interacts with children and adolescents in the context of activities organized by Fe y Alegría Peru. Failure to comply may give rise to disciplinary proceedings and, where necessary, legal action.

All actions and conduct must be governed by the principle of the best interests of the child and the adolescent, in accordance with the Peruvian legal framework.

Annexes 4 and 6 to this Policy contain the commitment that must be signed by every staff member, volunteer, consultant and ally; it will be kept by the Human Resources Department and filed in the corresponding OPPCA file of Fe y Alegría.

3.3.1. Acceptable behavior and conduct

Persons who collaborate or take part in the activities of Fe y Alegría Peru, including consultants and volunteers, must:

- Promote a culture of openness and mutual accountability, facilitating the discussion and resolution of child-Protection issues.
- Avoid abusive behavior in all circumstances.
- Establish appropriate arrangements and places for meetings with children and adolescents, avoiding private or closed-door meetings and spaces that are difficult to leave. Organizing meetings in the homes of teachers or students is prohibited.
- Foster a safe, positive and respectful environment that values children and adolescents as individuals and protects their integrity.
- Apply the "two-adult rule": that is, ensure that at least two adults are always present during interactions with children and adolescents, especially during activities held outside educational centers.
- Maintain appropriate physical contact with minors, ensuring that it is suitable and respectful of the privacy and culture of the child or adolescent.
- Use positive, non-violent methods to manage the behavior of children and adolescents.

3.3.2. Unacceptable behavior and conduct

In the course of their duties, staff members, consultants and volunteers must not:

- Touch, caress, kiss or hug children and adolescents in a manner that is inappropriate or inconsistent with their culture.
- Take part in activities that involve being alone with children and adolescents unnecessarily, beyond professional needs.
- Make discriminatory or lewd comments or sexual jokes, or make remarks about the identity, sexual orientation, gender, ethnicity, religion or any other status of a child or adolescent.
- Engage in sexual activities or establish inappropriate relationships with children and adolescents, regardless of their consent or of local customs.
- Hit or physically punish children and adolescents, or subject them to any physical or psychological abuse
- Develop abusive or exploitative relationships with children and adolescents.
- Spend the night with children or adolescents in the same room or bed or receive them in their home without the supervision of another adult.
- Transport a child or adolescent in a vehicle without the consent of their mother, father or guardian, except in emergencies.
- Possess, distribute or disseminate CSAM.
- Send inappropriate messages to children and adolescents via social media or messaging applications.
- Consume drugs or alcoholic beverages during work activities or attend them while intoxicated or under the influence of psychoactive substances.

- Carry firearms or bladed weapons in educational centers or workplaces.

3.3.3. Sanctions for breaches of the Code of Conduct

- If an employed staff member commits a breach of the Code of Conduct that does not directly harm a child or adolescent but represents a risk, the following will apply:
 - A formal warning, with a copy placed on the staff member's file.
 - A probationary period of one to two months to verify that the risky conduct has ceased. If the conduct persists, the employment relationship will be terminated.
- If the breach is committed by a consultant or volunteer:
 - A warning will be issued, with a copy to the person responsible for their relationship with the organization.
 - Their participation in activities will be suspended pending an assessment of whether they may continue or are to be permanently separated.
- If the misconduct committed by staff members, consultants or volunteers constitutes an offense, the following steps will be taken immediately:
 - The matter will be reported to the competent authorities, in accordance with the Peruvian Penal Code.
 - The person responsible will be removed from their position or activity, with no possibility of reinstatement.

3.3.4. Commitment to the Code of Conduct

- All staff members, consultants and volunteers must sign the "Commitment to the Code of Conduct of Fe y Alegría Peru" (Annex 7) on joining Fe y Alegría Peru. This commitment will be filed with the Human Resources Department and in the OPPCA file.
- Breach of the Code of Conduct constitutes serious misconduct, and the corresponding disciplinary measures will be applied in accordance with the Internal Work Regulations and the legislation in force.
- All members of Fe y Alegría Peru, including guests and visitors, are responsible for following this Code of Conduct in their working and personal lives, embracing its principles as an integral part of their behavior and reporting any violation affecting children and adolescents.

3.4. Onboarding and training

All employed staff, as well as consultants, volunteers and other persons taking part in activities organized by Fe y Alegría Peru, must complete an initial training process on the implementation of the OPPCA. This process will include an online or in-person induction and a questionnaire to verify the knowledge acquired.

Staff members will be informed about the OPPCA and their responsibilities under it from the start of their employment with Fe y Alegría. In addition, periodic training will be provided to staff with specific child-Protection responsibilities; this training will be organized by those responsible for the OPPCA in coordination with the Human Resources Department.

Training processes will likewise be implemented for children and adolescents, families and educational communities, to ensure that the OPPCA is properly understood and applied. To this end, pedagogical mediation will be used with students, adapted to the age, cultural and academic characteristics of each group (Annex 8).

Each year, or whenever there are staff changes, the person responsible for the OPPCA at the National Office will share the names of the Protection focal points with educators, children and adolescents, and families. This will ensure that everyone involved in the National Office's activities knows the persons designated to deal with Protection matters.

Onboarding checklist

The head of the Child Protection Committee, in coordination with the Human Resources Department and the representative of the Identity and Mission Office, will verify annually that the actions set out in Table 5 have been carried out.

Table 5. Actions relating to onboarding and training

A	Provide general training on the OPPCA, its definitions, the Code of Conduct and the reporting pathway for all existing staff.
B	Provide a general onboarding on the OPPCA, its definitions, the Code of Conduct and the reporting pathway for all new staff.
C	Whenever the OPPCA is revised and amended, offer all existing staff updated general training on the OPPCA, its definitions, the Code of Conduct and the reporting pathway.
D	The children and adolescents served by the National Office of Fe y Alegría Peru will establish and abide by agreements to guarantee a safe environment in the spaces it provides.
E	Provide staff with specific responsibilities (management teams, focal points and Human Resources staf) with an in-depth onboarding on their duties, risk analysis and mitigation, the handling of reports, and monitoring and evaluation mechanisms.
F	Write all information on the OPPCA in clear language that adults, children and adolescents, and families can understand.

Implementation and follow-up of training

Training will be planned and recorded by the focal points and the Human Resources Department, which must keep an up-to-date record of participation in onboarding and training processes (Annex 9). Initial training will be supplemented by adapted educational resources, such as printed and digital materials, to ensure that everyone involved has an adequate understanding of the OPPCA.

This process ensures that all stakeholders understand their child-Protection responsibilities and fosters the creation of safe and respectful environments in all the activities of Fe y Alegría Peru.

3.4.1. Ongoing training on the Policy on the Protection of Children and Adolescents

Fe y Alegría Peru regards ongoing training as a fundamental tool for ensuring the effective implementation of the OPPCA. The aim of this training process is to strengthen the capacities of staff, allies and volunteers in the prevention and detection of, and response to, situations that may violate the rights of children and adolescents.

Objectives of ongoing training

- A. Ensure that everyone involved understands the principles and guidelines of the OPPCA
- B. Promote an institutional culture of prevention and active protection of children and adolescents.
- C. Provide practical tools for identifying and managing the risks associated with activities involving children and adolescents.
- D. Ensure that everyone involved knows and follows the reporting pathway and the response protocol for situations of risk or violation.

Groups covered by training

- **Staff:** all personnel directly employed by Fe y Alegría Peru, including administrative and teaching staff.
- **Partners and strategic allies:** organizations and individuals associated with Fe y Alegría Peru in joint activities involving children and adolescents.
- **Volunteers:** persons who take part, temporarily or permanently, in activities organized by Fe y Alegría Peru.

Annual Training Plan

Each year, the National Office will draw up an annual training plan (Annex 10) that will include the following actions:

A. General training

A mandatory induction for new staff, allies and volunteers, presenting the principles of the OPPCA, the Code of Conduct and the reporting pathway.

B. Refresher workshops

Workshops for current staff and strategic allies, covering topics such as practical cases, risk analysis and the management of specific situations.

C. Specialized training

Aimed at focal points, coordinators and department heads, and focused on specific roles, the handling of reports and risk mitigation strategies.

D. Follow-up and evaluation

Follow-up will take place throughout the year, and, at the end, an annual evaluation of the knowledge acquired will be carried out using instruments such as checklists and questionnaires.

E. Self-study materials

Guides, presentations and resources on OPPCA-related topics will be made available on the institution's intranet and on the digital platforms intended for strategic allies.

Records and evidence

- All participants must sign the "Attendance Record for Activities Led by the National Office of Fe y Alegría Peru" (Annex 11), which will be kept by the OPPCA focal point.
- The systematization of training will include an annual report evidencing the implementation of the training plan and its impact on the implementation of the OPPCA.

Oversight of the Annual Training Plan

The focal point will be responsible for coordinating, monitoring and evaluating compliance with the Annual Training Plan, and for ensuring that it responds to the current needs of the organization and its allies.

This section reinforces Fe y Alegría Peru's commitment to the ongoing training of everyone involved in the protection and holistic development of children and adolescents.

3.5. Safe program design

Fe y Alegría Peru develops educational and social development programs focused on fostering the holistic development of children and adolescents. Within this framework, before any program or project is designed and implemented, Fe y Alegría is required to carry out a risk analysis and mitigation process to prevent any violation of the rights of the children and adolescents taking part in these initiatives.

The design and implementation of programs must be guided by the principle of the best interests of the child and the adolescent, as established in Peru's Code on Children and Adolescents (Law No. 27337). All actions carried out must ensure that they neither create risks for, nor adversely affect, children and adolescents; to this end, preventive measures aligned with the OPPCA are implemented.

Through these measures, Fe y Alegría Peru reinforces its commitment to the safety, well-being and holistic development of children and adolescents, ensuring that all its programs are carried out to the highest child-Protection standards.

3.6. Roles and responsibilities

At Fe y Alegría Peru, we are all responsible for protecting the life and integrity of the children and adolescents involved in the activities we carry out from the National Office. In addition, every member of the institution has a clear and specific role in ensuring the effective implementation of the OPPCA.

3.6.1. General responsibilities of staff, volunteers, consultants and associated persons

Any person who, by virtue of their position, has direct or indirect contact with children and adolescents has the following general responsibilities:

- Have a thorough knowledge of the OPPCA
- Commit to the guidelines established in the OPPCA.
- Be alert to abuse and risks that may affect children and adolescents.
- Comply with the staff Code of Conduct.
- Prevent the maltreatment of minors and protect children and adolescents.
- Promote good practice and reject poor practice.
- Build a culture of peaceful and safe coexistence for children and adolescents.
- Inform children and adolescents about reporting procedures and help them recognize inappropriate behavior.
- Know the national legal frameworks relating to child protection.
- Report any incident, inappropriate behavior or suspicion.
- Respond in accordance with the reporting protocol in cases of concern, allegation or knowledge of possible risks.
- Take an active part in investigations relating to child Protection, providing the necessary information and cooperation.

3.6.2. Organization for implementation and oversight

To ensure compliance with Protection protocols within the institution, Fe y Alegría Peru organizes responsibilities by post and institutional body as follows:

A. National Director

- Ensures compliance with and implementation of the OPPCA in all the organization's areas and activities.
- Leads the institutional commitment and promotes an organizational culture that prioritizes the protection of children and adolescents as a fundamental principle.
- Monitors the functioning of the Child Protection Committee, ensuring that it fulfils its responsibilities and objectives.
- Acts as the official institutional spokesperson in situations of high media relevance, or designates a suitable person to represent Fe y Alegría.
- Fosters partnerships with external bodies that support the protection of children and adolescents, such as authorities, organizations and inter-institutional networks.
- Facilitates the updating of the OPPCA every five years or as needs are identified.
- Ensures transparency and that all internal reports and reports to the authorities are handled with professionalism, confidentiality and diligence.

B. Child Protection Committee

The Child Protection Committee of the National Office of Fe y Alegría Peru is made up of representatives of the key departments of the National Office, appointed by the Board of Directors. The committee comprises one representative each of the General Secretariat, Administration, Human Resources and Identity and Mission. The latter acts as the institution's Protection focal point. In cases of media relevance, the head of the Communication and Advocacy Office also joins the committee to coordinate the communication strategy and relations with the media (Annex 12).

In coordination with the Human Resources Department and the representative of the Identity and Mission Office, the Committee is responsible for verifying annually that actions relating to induction and training have been carried out, ensuring the effective implementation of the OPPCA. Specifically, it must:

- Analyze reported cases and determine the corresponding actions or sanctions.
- Advise the focal point on the measures and actions appropriate to each specific case.
- Draw up minutes of each meeting (Annex 13), which will be kept by the focal point.

C. Human Resources Department

- Ensures that recruitment processes comply with the Protection standards established in the OPPCA.
- Verifies that all staff receive the initial induction on the OPPCA, the Code of Conduct and the reporting pathway.
- Keeps the commitments to the OPPCA and the Code of Conduct signed by staff members, consultants and volunteers.

- Evalúa los riesgos propios del Área relacionados con la protección de menores, y diseña medidas de mitigación cuando es necesario.
- Verifica anualmente el cumplimiento de las acciones relacionadas con la inducción y la capacitación del personal, los aliados y las y los voluntarios, asegurando la actualización continua.

D. Program heads and coordinators, and project managers

- Carry out risk analysis and mitigation for activities and projects involving children and adolescents, with the support of protection networks.
- Ensure that the OPPCA is applied in their programs and activities.
- Share the OPPCA with the consultants and volunteers under their responsibility.
- Arrange for persons hired for, or involved in, the programs to sign the commitments to the OPPCA and the Code of Conduct.

E. Administration Department and General Secretariat

- Provide logistical and operational support so that the focal point can carry out the actions needed to ensure compliance with the OPPCA.

F. Identity and Mission Office: the focal point

The head of the Identity and Mission Office acts as focal point (see the profile in Annex 14), with the following functions:

- Oversee the implementation of the OPPCA and ensure compliance with the Code of Conduct.
- Handle reports and incidents relating to the protection of children and adolescents.
- Support the resolution of conflicts that do not constitute offenses.
- Run training workshops on violence prevention.
- Build inter-institutional support networks to address specific cases.
- Be available at all times to receive enquiries and reports, ensuring that the whole institution knows how to make contact.
- Refer disciplinary proceedings to the Human Resources Department.
- Accompany proceedings relating to the commission of offenses and expedite reports to the authorities where appropriate.
- Systematize reports on the cases handled and keep the related files (Annex 15).

3.7. Children and adolescents in communications

At Fe y Alegría Peru, we promote respect for and the protection of the image, privacy and integrity of children and adolescents in all our institutional communications. This covers printed, digital and audiovisual media and all informational or promotional materials relating to our activities.

3.7.1. Commitment to protecting the image of children and adolescents

To guarantee the safety of, and respect for, minors, we comply strictly with Law No. 29733, the Personal Data Protection Law. Accordingly, before any image or personal data of a child or adolescent is used, the express consent of their father, mother or legal guardian is required through the "Image Use Authorization Form".

Authorization process

A. Prior consent

- For any event, activity or publication involving minors and the use of their images, the mother, father or guardian is asked to complete and sign the "Authorization for the Use of Images of Minors" (Annex 16). For activities involving adults, the adults concerned must complete and sign the "Authorization for the Use of Images of Adults" (Annex 17).
- Both forms explain the purpose, scope and conditions of use of the images and guarantee the right of the child, adolescent or adult to request the cancellation or modification of a previously signed authorization.

B. Storage and security

- Images are stored in the Marketing Campaigns database, owned by Fe y Alegría Peru and registered with the Directorate for the Protection of Personal Data.
- Fe y Alegría adopts technical, organizational and legal security measures to protect the information in that database and to prevent unauthorized access, misuse or theft.

C. Communication activities

- Images will be published only on institutional platforms (website, social media, brochures, annual report, institutional video and videos of educational initiatives) and in activities promoting our educational and social work
- Images will not be used for any other purpose without additional authorization.

Statement of accountability and transparency

Fe y Alegría undertakes to respect the wishes of mothers, fathers and guardians and guarantees that:

- No image will be published without explicit authorization.
- The legal representative has the right to rectify, update or cancel the authorization at any time by sending an email to peru@feyalegria.org.pe

Importance of the authorization form for minors

The "Authorization for the Use of Images of Minors" form ensures:

- The agreement of the father, mother or guardian to the processing of images of the children or adolescents for whom they are legally responsible.
- Clarity regarding the intended uses and the rights of the data subjects.
- The protection of the identity and dignity of minors.

This procedure strengthens our institutional commitment to promoting a safe and respectful environment for all children and adolescents.

3.8.

Conditions for working with partners and allies

Fe y Alegría Peru requires all organizations, institutions and individuals with which it collaborates to be committed to the protection of children and adolescents and to comply with clear and strict child and adolescent Protection standards.

Commitments for partners and allies

A. Adherence to Fe y Alegría Peru's Organizational Policy on the Protection of Children and Adolescents

Where an allied organization does not have its own child-Protection protocol, it must adhere to Fe y Alegría Peru's OPPCA, undertaking to comply with all its guidelines and procedures.

B. Commitment to develop its own protocol

Where the relationship between Fe y Alegría Peru and the allied organization is permanent or long-term, the allied organization undertakes to begin developing its own child-Protection protocol, aligned with the principles of comprehensive child protection.

C. Signature of the commitment form for allies

Every allied organization or institution must complete and sign the "Commitment to Fe y Alegría Peru's Organizational Policy on the Protection of Children and Adolescents (Allies)" (Annex 6), a document in which it acknowledges its responsibility for protecting children and adolescents and its adherence to the established guidelines.

Supervisión y seguimiento

- Fe y Alegría Peru will supervise compliance with the commitments made by its partners and allies, ensuring that all activities in which they take part guarantee safe, violence-free environments for children and adolescents.
- In the event of non-compliance with the commitments made, Fe y Alegría Peru will assess whether to continue its relationship with the allied organization.



4 Unforeseen rights violations (Lack of protection)

Although Fe y Alegría Peru carries out risk analyzes and implements mitigation plans, unforeseen situations may arise that impair the physical, psychological or sexual integrity of children and adolescents, thereby violating their rights. In such circumstances, the National Office undertakes to provide timely and effective follow-up, where the matter falls directly within its remit, in accordance with this OPPCA, with the aim of restoring the rights violated and guaranteeing the protection of the child or adolescent.

Reporting unforeseen violations

Any person associated with the National Office — staff, consultants, volunteers or interns — who, in the course of their duties, becomes aware of an unforeseen violation or a case of failure of protection must report it immediately to the Protection focal point, who will be responsible for handling the report and activating the corresponding protocols.

False reports

Where, as a result of a judicial or administrative proceeding established under Peruvian law, it is determined that the facts reported by one adult against another in connection with the violation of the rights of a child or adolescent are unfounded, Fe y Alegría Peru, in coordination with the person affected, may file a complaint with the Public Prosecutor's Office for the offense of malicious false accusation, pursuant to article 131 of the Peruvian Penal Code. This article provides that anyone who knowingly and falsely attributes the commission of an offense to another person shall be punished with imprisonment of up to two years or with community service.

This measure seeks to protect the reputation and integrity of persons unjustly accused and to ensure that reporting processes are used responsibly and truthfully.

Through these provisions, Fe y Alegría Peru reaffirms its commitment to the comprehensive protection of children and adolescents and to the ethical and responsible handling of cases that arise in the course of its activities

4.1.**Handling of internal reports and reports to the authorities at Fe y Alegría Peru****Internal report of a violation or case of failure of protection (Annex 18)**

- It is received by the Protection focal point through the established channels (in person, online or anonymously).
- It triggers a preliminary internal analysis to determine whether actual risks or violations exist.
- If the report is found to be unfounded, it is closed and the person who made it is notified.

Report to the authorities of a violation or case of failure of protection (Annex 19)

- It is submitted when it is confirmed that an offense or a serious violation has occurred.
- The focal point formally submits the report to the competent authorities (Public Prosecutor's Office, National Peruvian Police).
- The victim is accompanied, and their comprehensive protection is guaranteed throughout the legal process.

4.2. The reporting pathway

The reporting pathway sets out the steps to be followed in situations of risk, violations of rights or alleged offenses involving children and adolescents, thereby ensuring the protection of their rights and compliance with Peruvian law. Procedures vary according to the context in which the incident occurs, in accordance with the provisions of the Peruvian Penal Code, the Code on Children and Adolescents (Law No. 27337) and Law No. 30364 (Law to Prevent, Punish and Eradicate Violence against Women and Members of the Family Group).

The official channels for submitting reports are as follows:

- Email: protecciondemenores@feyalegria.org.pe
- Web form: available at www.feyalegria.org.pe/protecciondemenores
- In person: with the focal point — the General Coordinator for Identity and Mission — at the headquarters of the National Office of Fe y Alegría (Jr. Cahuide 884, Jesús María, Lima).

In all cases, the person making the report must provide contact details so that they can be notified of its progress. The confidentiality of the information shared will be guaranteed at all times.

Mandatory reporting

Reporting is mandatory only in the cases provided for by law. In such cases, the persons designated by national legislation have a duty to report any offense of which they become aware, especially offenses involving acts of violence against children and adolescents. This obligation is particularly strict for:

- Staff members, educators and heads of educational institutions.
- Any person who, by virtue of their post or function, becomes aware of an act of violence.

Failure to comply with this obligation may constitute the offense of failure to report, in accordance with national legislation. This offense entails criminal liability for those who, being able and obliged to do so, fail to report acts of violence.

Procedure in cases of violence

If a case of violence against a child or adolescent involving any of the persons covered by this protocol comes to light, the reporting pathway established in the OPPCA must be strictly followed. The focal point will be responsible for handling the case, coordinating the necessary actions and, where appropriate, referring the case to the competent authorities, ensuring that the process is swift and effective.

4.2.1. Situations in which National Office staff witness an offense

If a member of Fe y Alegría's staff directly witnesses an act that constitutes a violation or an offense against a child or adolescent, they must:

- **Act immediately**
 - Ensure the safety of the child or adolescent at that moment.
 - Notify the Protection focal point.

- **Report the incident**

To do so, they must record what happened in precise detail in the "Log of Reports to the Authorities" (Annex 19):

- Date, time and place of the incident

- Description of the act observed
- Persons involved
- **Activate the reporting protocol**
 - Inform the institution's competent authorities within 24 hours of the act of violence occurring or coming to light.

4.2.2. Situations in which National Office staff are involved in the offense

If a member of Fe y Alegría's staff is implicated in a report, the specific steps set out below are followed, depending on the context.

4.2.2.1. In cases of flagrante delicto

This applies when the criminal act is evident (flagrante delicto). In such cases, the focal point must:

- **Report immediately**
 - Notify the competent authorities (Public Prosecutor's Office or PNP) directly.
 - Activate immediate protection measures for the victim, including removing the alleged perpetrator from the workplace.
- **Secure the evidence**
 - Document the incident and preserve all available evidence (photographs, videos, witness statements, etc.).

- **Protect the victim**
 - Provide psychological care and social support.
 - Inform the father, mother or guardian of the action taken.

Legal references

- Peruvian Penal Code
- Code on Children and Adolescents (Law No. 27337), article 18 (duty of heads of educational centers to report violence against students)
- Law No. 30364, Law to Prevent, Punish and Eradicate Violence against Women and Members of the Family Group, article 15 (duty of education and health professionals to report)

4.2.2.2. In cases of false reports

This applies when a report is found to be unfounded. In such cases, the following must be done:

- **Close the case**
 - Formally record that there is insufficient evidence to substantiate the report.
 - Inform the person who made the report of the decision to close the case.
- **Support the staff affected**
 - Provide legal advice to the staff affected so that they can file a complaint for malicious or false accusation, pursuant to article 402 of the Peruvian Penal Code.

- Strengthen institutional trust

- Publicize responsible reporting mechanisms and the sanctions applicable in the event of misuse of the system.

4.2.2.3. In cases of a committed offense

This applies when it is confirmed that a member of staff has committed an offense. In such cases, the following must be done:

- Terminate the employment of the accused

- Terminate the employee's contract immediately, in accordance with article 61 of Legislative Decree No. 728 (Labor Productivity and Competitiveness Law).

- Report formally to the authorities

- Inform the competent authorities within 24 hours of the act of violence occurring or coming to light, providing all the evidence gathered.

- Protect the victim

- Provide comprehensive care to the victim, including psychological and social support.
- Ensure that the victim is in a safe environment.

- Monitor the case

- Follow the progress of the case through the legal system and ensure transparency in the process

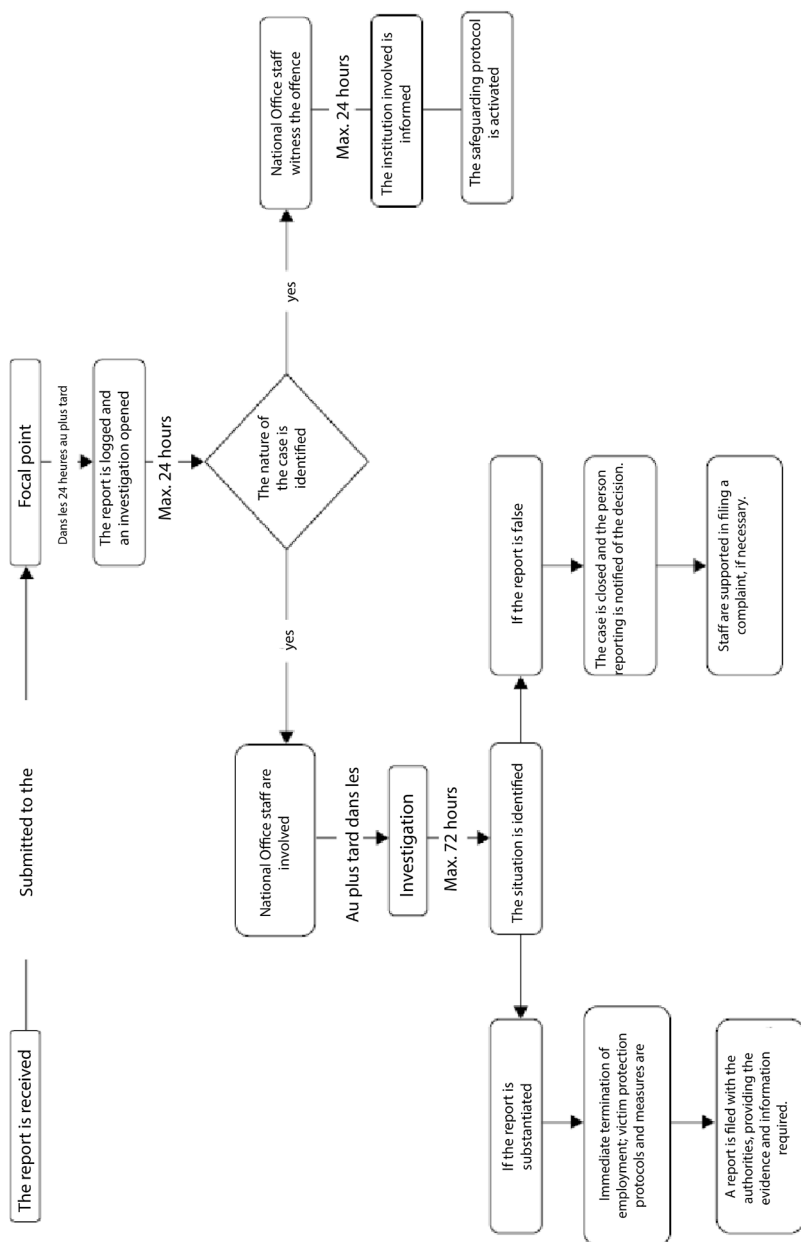
4.2.3. Steps in the reporting pathway

Table 6. Reporting pathway

Step	Description	Responsible	Timeframe	Response to the victim and the person reporting
Receipt of the report	The report may be submitted through any channel (in person, electronically or via the reporting channel; Annex 20). The focal point verifies that the person reporting or the victim actually exists.	Protection focal point	Immediate	Acknowledgement to the person reporting through the channel indicated, with a guarantee of confidentiality.
Initial communication	The focal point informs the Child Protection Committee and the department concerned of the report so that the analysis can begin.	Focal point	Within 24 hours of the act of violence occurring or coming to light	Notification that the analysis process has begun. If the victim is identified, psychological and social support is provided throughout the investigation. If the person involved is a member of National Office staff, immediate precautionary measures are taken, and they are removed from the workplace.
Preliminary assessment	Determination of the nature of the case, the risks involved and the admissibility of the report.	Focal point and Child Protection Committee	Within 24 hours of the act of violence occurring or coming to light	Notification to the person reporting of the initial progress of the analysis.
Verification of flagrante delicto	If flagrante delicto is detected (immediate evidence of the offense), the focal point reports directly to the competent authorities (Public Prosecutor's Office or PNP).	Focal point	Immediate	Information to the person reporting about the report submitted.

Step	Description	Responsible	Timeframe	Response to the victim and the person reporting
Confirmation of risk	If there is no flagrante delicto, the committee assesses whether there is a confirmed risk or an offense.	Child Protection Committee and focal point	Within 72 hours of the preliminary assessment	Notification to the person reporting stating whether action will be taken or the case will be closed.
Closure owing to a false report	If the report is confirmed to be false, the case is closed. In addition, support is provided to the staff affected to bring a complaint for defamation or calumny, where appropriate.	Child Protection Committee	Within 72 hours of the preliminary assessment	Information to the staff affected about their rights and the legal steps to be taken.
Activation of the protocol	If a risk or offense is confirmed, the protocol is activated: notification of the competent authorities (PNP, Public Prosecutor's Office) and application of precautionary measures (such as removal from the workplace).	Child Protection Committee	Immediate	Notification to the victim of the action taken and the protection measures applied.
Separation of the employee	If the staff member's responsibility is established, their employment is terminated and their contract ended.	Human Resources Department	Depending on the seriousness of the case	Communication to the person reporting and the victim of the final decision
Reporting at other institutions	If the offense is witnessed at another institution, the National Office informs the entity concerned, providing it with evidence and supporting it throughout the reporting process and follow-up.	Focal point	Immediate	Coordination with the institution and follow-up of the actions implemented.
Case closure	The case is closed when all necessary measures have been implemented and documented in the National Office's records.	Focal point and Child Protection Committee	As appropriate	Final communication to the parties involved on the closure and the measures adopted.

4.2.4. Reporting pathway flowchart



4.3. Revictimization

Revictimization is the additional suffering experienced by victims when a report is being dealt with, as they are required to recall and relive the experience of violence during the investigation and care process. This can have significant effects on the psychological and emotional integrity of the child or adolescent who makes the report or on whose behalf it has been made. The National Office of Fe y Alegría Peru undertakes to guarantee an effective and timely response that minimizes these effects and restores the rights of the child or adolescent.

4.3.1 Preventing revictimization

A. When the report is made

- Listen to the report attentively and empathetically, without interrupting the child or adolescent.
- Tell the child or adolescent that you believe them: "I believe you."
- Ensure the confidentiality and privacy of the person reporting.
- Ask relevant questions to establish the key facts, such as:
 - Who committed the violent act?
 - Who witnessed the incident?
 - Were other people involved?

- Inform the person responsible for the child or adolescent of the options available regarding the report, including the impact of what happened and the possibility of continuing risk.
- Allow the child or adolescent to decide on the restorative actions with which they feel safe.
- Assess the emotional comfort of the child or adolescent throughout the reporting process.
- Avoid asking the child or adolescent to repeat their account or demanding further details of the experience of violence.

B. At any point in the process

- Avoid confronting the child or adolescent with the alleged perpetrator during interviews.
- If the report concerns a member of Fe y Alegría's staff, communicate the complaint in general terms, without revealing the identity of the person reporting, at the time of first contact.
- If the incident occurred within the family environment of the child or adolescent, ask them whether they would like staff to speak with their mother and/or father to reflect on the incident.



4.3.2. Actions that prevent revictimization

4.3.2.1. When the incident does not constitute an offense

- Listen to the report and accept it as valid from the outset.
- Ensure confidentiality and respect for the report made by the child or adolescent

- Ask questions only to obtain relevant and necessary information.
- Provide clear information about the process and the options available, ensuring that the child or adolescent understands what each action involves.
- Allow the child or adolescent and their family to choose the restorative actions best suited to their needs and situation.
- Continuously assess the emotional comfort of the child or adolescent in order to provide appropriate emotional support.

4.3.2.2. When the incident does constitute an offense

- Listen to the report attentively and respectfully.
- Explain clearly to the child or adolescent that what happened is an offense and must be reported to the competent authorities (Public Prosecutor's Office, PNP).
- Inform the child or adolescent of the need to notify their mother, father, guardian or another trusted adult.
- Report to the competent authorities within a maximum of 24 hours of the act of violence occurring or coming to light.
- Allow the child or adolescent and their family to choose whether they wish Fe y Alegría staff to accompany them during the legal process.
- Avoid asking questions that could revictimize the child or adolescent or demanding further details of their experience.
- Offer emotional and psychological support throughout the process.

4.3.3. Precautionary measures

If it is confirmed that a Fe y Alegría staff member has committed an offense, they will be removed from the workplace and the Child Protection Committee will be notified. This decision is taken within a maximum of 24 hours of the act of violence occurring or coming to light. Care is taken to ensure that information about the person reporting, and the context is shared only with authorized personnel.

Follow-up of the process

For appropriate follow-up, the following actions must be taken:

- Inform the focal points of the National Office immediately of the case and the actions taken.
- If the report involves a staff member, assess their possible suspension from duties during the investigation.
- If the child or adolescent or their family does not submit a formal report, act in accordance with the established regulations by reporting to the authorities from the National Office.
- Document and file all actions taken appropriately.

This reporting pathway must always be used with due regard for confidentiality and for the integrity of everyone involved, ensuring that the rights of the child or adolescent are addressed as a priority.

4.4.

Directory of strategic allies: Inter-institutional Support Network

The National Office of Fe y Alegría Peru has a directory of strategic allies (Annex 21) made up of relevant organizations and institutions at national and local level. This directory is essential for prevention, care and response in cases of maltreatment, violence and situations of risk involving children and adolescents..

4.4.1. Building the Inter-institutional Support Network

To strengthen the protection network for children and adolescents, the National Office must:

A. Map institutional resources

- Identify the organizations, public and private institutions and key stakeholders that can provide comprehensive support to children and adolescents in situations of risk.
- Compile an up-to-date register with detailed contact information and the services offered by each entity.

B. Establish strategic partnerships

Build links with institutions of the justice and protection systems, such as:

- Public Prosecutor's Office (Office of the Attorney General): for reporting offenses and legal proceedings.
- PNP: for immediate intervention in cases of flagrante delicto or risk.
- Municipal Ombudsman's Office for Children and Adolescents (Demuna): for guidance and mediation in family matters.

- Ministry of Women and Vulnerable Populations (MIMP): for access to social and psychological assistance services.
- Ministry of Health (Minsa): for medical and psychological care for children and adolescents who are victims of violence.
- Judiciary: to guarantee access to justice.

C. Identify local resources

Map, at local level, community organizations, municipalities, training centers, NGOs and local networks that can provide specific resources, such as shelters, psychological care, specialized training, legal advice and educational programs.

The national organizations and institutions listed in Annex 21 should be used as a reference when carrying out this local mapping.

D. Update the directory periodically

- Ensure that the contact information of each ally is current.
- Include new relevant stakeholders as opportunities for collaboration arise.

4.4.2 Key actions for network building

To ensure an effective support network, the following must be done:

A. Establish direct contact

- The focal point of the National Office must coordinate meetings with representatives of key institutions.

B. Strengthen inter-institutional collaboration

- Formalize cooperation agreements or memoranda of understanding with the entities identified.
- Take part in inter-institutional coordination forums on child protection

C. Conduct joint training

- Organize workshops with strategic allies to strengthen the focus on the protection of children and adolescents, based on national legislation such as the Code on Children and Adolescents (Law No. 27337) and Law No. 30364.

D. Publicize the Inter-institutional Support Network

- Share the directory with Fe y Alegría's internal staff so that the Inter-institutional Support Network can be accessed in emergencies.

Benefits of the Inter-institutional Support Network

- Prevention: identify and mitigate risks before situations of violence occur.
- Intervention: respond quickly and efficiently to incidents, in coordination with the competent institutions.
- Comprehensive protection: ensure that children and adolescents have access to medical, psychological, legal and social care.
- Institutional trust: reinforce the perception of Fe y Alegría as a safe environment committed to child protection

This Inter-institutional Support Network ensures that Fe y Alegría Peru has the support it needs to deal with complex situations and to provide comprehensive protection to the children and adolescents who take part in its programs and activities.



5 Monitoring, evaluation and updating

5.1. Actions by the National Office

The National Office of Fe y Alegría will carry out the annual evaluation and monitoring of the implementation of the OPPCA, specifying dates and the persons responsible for monitoring as an integral part of the POA (Annex 22).

This process includes:

A. For new staff members, consultants and volunteers

Publication of vacancies that include the commitment to the OPPCA (Annex 3), as well as clauses on that Policy and on the Code of Conduct in contracts. Successful candidates must sign the commitments and undertake to take part in Protection training and induction.

B. For existing staff

Signature of the commitments to the OPPCA and the Code of Conduct, updating of contracts with specific clauses, participation in the annual ongoing training plan, recording of training completed and documented appointment of focal points.

C. For the focal point

Preparation of annual reports on support actions and on the evaluation of departmental activities to ensure compliance with the OPPCA; these reports will be submitted to, and reviewed by, the Child Protection Committee.

D. Regarding risk analysis

The focal point is responsible for ensuring that risks and mitigation strategies are recorded and reported. This process will be carried out by supporting each department and project, and will involve presenting an annual risk analysis that identifies specific risks, sets out mitigation strategies and links this analysis to the design of the POA.

5.2. Evaluation, monitoring and updating

A. Annual evaluation

The focal point will apply an evaluation and monitoring instrument (Annex 22) to measure the implementation and use of, and compliance with, the OPPCA in each department of the National Office.

Benefits of monitoring and evaluation

- Efficiency: identification of successful processes and of lessons learned from the experience gathered in each department.
- Accountability: assurance that everyone involved complies with the OPPCA guidelines.
- Prevention: detection of risks before they escalate, and timely action
- Institutional trust: strengthening the perception of Fe y Alegría as a safe institution committed to the protection of children and adolescents.

This monitoring and evaluation system guarantees continuous follow-up of the actions undertaken, enabling Fe y Alegría Peru to fulfil its mission of creating safe and protective environments for all children and adolescents.

B. Updating the Policy

Every five years, the Child Protection Committee of the National Office of Fe y Alegría Peru will evaluate and update the OPPCA (Annex 23). This review will ensure that the Policy remains relevant and functional, considering changing realities and the cases handled during the period.



6 Annexes

No.	Title	Link
Annex1	Approval of Fe y Alegría Peru's Organizational Policy on the Protection of Children and Adolescents (meeting minutes)	
Annex 2	Risk Analysis and Mitigation Planning	
Annex 3	Job Advertisement	
Annex 4	Commitment to Fe y Alegría Peru's Organizational Policy on the Protection of Children and Adolescents (Staff and Volunteers)	
Annex 5	Instructions and Question Guide for Job Interviews on the Protection of Children and Adolescents	
Annex 6	Commitment to Fe y Alegría Peru's Organizational Policy on the Protection of Children and Adolescents (Allies)	
Annex 7	Commitment to the Code of Conduct of Fe y Alegría Peru	
Annex 8	Plan for the Strategy to Raise Children's and Adolescents' Awareness of Protection Protocols	
Annex 9	Follow-up of Induction and Training Processes	
Annex 10	Annual Training Plan for the Implementation of Fe y Alegría Peru's Organizational Policy on the Protection of Children and Adolescents, 2025	
Annex 11	Attendance Record for Activities Led by the National Office of Fe y Alegría Peru	
Annex 12	Communication Guidelines for High-Profile Media Cases	
Annex13	Acta de reunión del Comité de Protección de Menores	
Annex 14	Profile of the Focal Point of the National Office of Fe y Alegría Peru	
Annex 15	Report on Cases Handled	
Annex 16	Authorization for the Use of Images of Minors	
Annex 17	Authorization for the Use of Images of Adults	
Annex 18	Internal Report Log	
Annex 19	Log of Reports to the Authorities	
Annex 20	Guidelines for Handling Reports Received through Digital Channels	
Annex 21	Directory of the Inter-institutional Support Network of Fe y Alegría Peru	
Annex 22	Checklist for the Evaluation and Monitoring of the Implementation of the OPPCA at the National Office of Fe y Alegría Peru	
Annex 23	Annual OPPCA Implementation Budget, 2025	



Fe y Alegría

Movimiento de Educación Popular Integral

PERÚ

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