# Child Safeguarding and Protection Policy

EMCS Advisory Ltd.

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This Child Protection Policy has been developed by EMCS Advisory Ltd. The following sections provide details of the company responsible for developing the policy and the composition of the Core Team involved in its preparation.

**EMCS Advisory Ltd**
Centris Business Gateway II
Level 4, Triq is-Salib tal-Imriehel, Zone 3
Central Business District
Birkirkara CBD 3020
Malta

**The Team**
Antoinette Gouder | Director, EMCS
Caroline Pavia Sciortino | Director, EMCS
Eszter Kosa | Manager, EMCS
Owen Felice | Executive, EMCS
Daniela Marotta | Associate, EMCS

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# 1. Purpose and Scope

EMCS Advisory Ltd is committed to ensuring that children who encounter the organisation through its projects, research, consultation, monitoring, evaluation or other professional activities are protected from harm.

For the purposes of this Policy, a child means any person under 18 years of age.

This definition applies to EMCS's safeguarding arrangements. Where the ICC/ESOMAR International Code distinguishes between children and young persons, EMCS shall take those distinctions into account while ensuring that the safeguarding protections set out in this Policy apply to all persons under 18 years of age. This Policy applies to all EMCS employees, temporary personnel, interns, volunteers and other associates whose work may bring them into direct or indirect contact with children or with information related to children.

The Policy is informed by the United Nations Convention on the Rights of the Child and the Keeping Children Safe International Child Safeguarding Standards[1]. The latter establish four mutually reinforcing areas: Policy, People, Procedures and Accountability.

EMCS adopts the following principles:

- the best interests, safety and well-being of the child are paramount;
- all children have an equal right to protection from abuse, neglect, exploitation and other forms of harm;
- safeguarding is everyone's responsibility;
- activities involving children must be designed to minimise foreseeable risks;
- children must be treated with dignity, respect and without discrimination;
- safeguarding concerns must be taken seriously, reported promptly and addressed in accordance with the appropriate procedures, with due regard for confidentiality and the child's safety.

These principles reflect the Keeping Children Safe International Child Safeguarding Standards, which recognise that organisations have a duty of care towards children with whom they work, come into contact or who may be affected by their activities and operations.

[1]Available online at: https://www.keepingchildrensafe.global/wp-content/uploads/2025/01/KCS-ICS-Standards-EN-2025-1.pdf Last accessed: 19/10/2026

# 2. STANDARD 1: POLICY

## 2.1 EMCS Commitment to Child Safeguarding

In accordance with Articles 1 (Duty of Care) and 2 (Children, Young Persons and Other Vulnerable Individuals) of the ICC/ESOMAR International Code, EMCS shall take reasonable measures to ensure that participation in research, whether involving direct interaction with children or the collection and processing of data concerning them, does not result in harm. EMCS shall exercise special care to ensure that research is appropriate to children's age, maturity and cognitive abilities, and that their welfare is considered throughout the research process, including research design, recruitment, consent, data collection, analysis, reporting and dissemination.

EMCS shall clearly distinguish research activities from non-research activities, including promotional, commercial or customer follow-up activities. Before data collection begins, participants shall be informed of any intended non-research activity, and separate consent shall be obtained for non-research purposes in accordance with the ICC/ESOMAR International Code and applicable law. Information collected for research shall not be used for unrelated non-research purposes without the required consent and appropriate legal basis.

EMCS has zero tolerance for abuse, exploitation, neglect, harassment or other conduct that harms or places a child at risk.

EMCS will take reasonable and proportionate measures to identify, prevent and mitigate risks of harm to children arising from its personnel, activities and operations, and will respond appropriately when safeguarding concerns arise. This includes risks arising from:

- direct interaction with children;
- interviews, focus groups, surveys and consultations;
- collection and processing of information concerning children;
- online or digital interaction;
- photographs, recordings or communication materials;
- activities delivered jointly with clients, consortium members or other organisations;
- inappropriate conduct by staff or other associates.

Safeguarding considerations will be incorporated into the design and implementation of any EMCS activity involving or affecting children through appropriate risk assessment and mitigation measures.

## 2.2 Equality and Non-Discrimination

All children will receive equal safeguarding protection irrespective of age, sex, gender identity, disability, ethnicity, nationality, religion, language, sexual orientation, social or economic circumstances or other status.

EMCS recognises that individual children may experience different vulnerabilities, barriers to participation or difficulties seeking support. Safeguarding arrangements will therefore be adapted where reasonably necessary to ensure inclusive and safe participation.

# 3. STANDARD 2: PEOPLE

## 3.1 Responsibilities

Overall accountability for implementation of this Policy rests with **EMCS senior management**. EMCS will designate a **Child Safeguarding Focal Point** responsible for:

- supporting implementation of this Policy;
- advising staff before activities involving children;
- ensuring safeguarding risks are considered;
- receiving safeguarding concerns;
- responding to initial reports in accordance with the established safeguarding procedures, including assessing urgency and taking appropriate immediate action to protect the child;
- maintaining appropriate confidential records;
- supporting referrals and escalation where necessary;
- monitoring implementation of safeguarding measures; and
- coordinating periodic review of the Policy.

A deputy or alternative reporting route will be designated so that safeguarding concerns are not dependent on one individual. Personnel must also be able to report concerns directly to senior management or the relevant external authorities where appropriate, particularly where the concern involves the Child Safeguarding Focal Point or senior management.

## 3.2 Safe Recruitment and Assignment of Personnel

Where a role involves direct contact with children, access to identifiable information concerning children, or responsibilities that may otherwise affect children's safety and well-being, EMCS will assess the safeguarding implications of that role before assigning personnel.

Appropriate measures may include:

- clear safeguarding responsibilities in job descriptions or terms of reference;
- verification of identity, qualifications and references;
- appropriate background or criminal-record checks where required or appropriate for the role;
- submission of a valid Police Conduct Certificate, and valid POMA clearance under the Protection of Minors (Registration) Act for personnel working or volunteering in direct contact with children and minors;
- safeguarding-focused questions during recruitment or assignment;
- confirmation of suitability before direct contact with children.

## 3.3 Training and Awareness

Personnel who have direct contact with children will receive safeguarding briefing or training appropriate to their responsibilities before undertaking such activities. All other personnel covered by this Policy will receive appropriate awareness-raising on their safeguarding responsibilities, recognising concerns and reporting procedures, proportionate to their roles.

This will cover, at minimum:

- responsibilities under this Policy;
- appropriate professional boundaries;
- recognising safeguarding concerns;
- handling disclosures;
- reporting and escalation procedures;
- confidentiality and data protection; and
- project/activity-specific safeguarding risks.

## 3.4 Code of Conduct

All EMCS personnel engaging with children must:

- treat children respectfully and equitably;
- maintain appropriate professional boundaries;
- use language and behaviour appropriate to the child's age and circumstances;
- avoid humiliating, discriminatory, intimidating or degrading behaviour;
- avoid unnecessary physical contact;
- avoid favouritism or forming inappropriate personal relationships;
- never seek to obtain unnecessary personal or sensitive information;
- never take, use, store or share photographs, videos or recordings of children without the required authorisation, appropriate consent and compliance with applicable data-protection and safeguarding procedures;
- never promise absolute confidentiality when a safeguarding concern may require reporting;
- avoid private communication with children through personal social-media accounts or unauthorised communication channels;
- report safeguarding concerns promptly through the approved procedure.

Personnel must avoid being alone with a child where this can reasonably be prevented and follow the safeguarding arrangements established for the specific activity.

All relevant staff and associates will be required to acknowledge and comply with this Policy and the applicable Code of Conduct.

# 4. STANDARD 3: PROCEDURES

## 4.1 Safeguarding Risk Assessment

Before an EMCS activity involving direct contact with children, or the collection, use or processing of personal data concerning children where safeguarding risks may arise, the Child Safeguarding Focal Point shall ensure that relevant safeguarding risks are assessed, and appropriate mitigation measures are established. For interviews, consultations and focus groups with minors, the assessment should consider:

- age and circumstances of participants;
- location and accessibility of the activity;
- supervision arrangements;
- sensitive subject matter;
- potential emotional distress;
- possibility of disclosure of abuse or harm;
- privacy and confidentiality;
- collection and storage of personal data;
- photography or recording;
- online participation, where applicable;
- emergency and referral arrangements.

## 4.2 Interviews, Focus Groups and Research with Children

EMCS personnel conducting interviews, focus groups, questionnaires or evaluation activities involving children must use age-appropriate, child-centred and do-no-harm methods. Furthermore, all premises and environments where children are present must be child-friendly, safe, and free from hazards that could pose a risk to their health, safety, or well-being.

Before participation, children must receive understandable, age-appropriate information about:

- the purpose of the activity;
- what participation involves;
- how their information will be collected and used;
- that participation is voluntary;
- their right to decline questions or withdraw from participation;
- confidentiality and its limits;
- EMCS's safeguarding commitments; and
- whom they may contact to raise concerns or seek help.

Before a child participates as a research participant, EMCS shall obtain consent from a parent, legal guardian or responsible adult in accordance with Article 2 of the ICC/ESOMAR International Code and applicable law. The child's age shall be established, and the required consent obtained before collecting additional personal data. The nature and extent of the information to be collected shall be explained to the person providing consent, together with a clear means of providing consent. Consent arrangements shall be documented and appropriate to the research method and circumstances.

The child's willingness to participate shall be respected, and children shall not be pressured to participate or continue against their wishes, even where parental, legal guardian or responsible adult consent has been obtained.

Where a participant withdraws from research, EMCS shall respect the withdrawal. Upon withdrawal, all personal data collected about the participant shall be deleted, provided this is technically and operationally feasible and does not compromise the integrity of previously collected or analysed research results, in accordance with Article 4(c) of the ICC/ESOMAR International Code and applicable law.

For online surveys, remote interviews and other digital research involving children, EMCS shall implement appropriate measures to verify and document the required parental, legal guardian or responsible adult consent before the child begins participating in the research. The process shall be appropriate to the research method and associated risks and shall not rely solely on an unverified declaration made by the child. Digital research shall also incorporate appropriate privacy, access-control and safeguarding measures.

Research and evaluation instruments should avoid unnecessarily eliciting personal experiences of abuse. Where sensitive issues need to be explored, questions should, where appropriate, focus on knowledge, perceptions, attitudes or carefully designed scenarios rather than requiring children to disclose personal experiences. Where personal experiences must be explored, this should be justified by the purpose of the activity, assessed through a safeguarding risk assessment, and supported by appropriate safeguards and referral arrangements.

## 4.3 Responding to Disclosures and Safeguarding Concerns

If a child discloses harm or a member of personnel observes or suspects a safeguarding concern, the person receiving the information must:

1. prioritise the child's immediate safety;
2. listen without conducting an investigation;
3. avoid promising complete confidentiality;
4. record necessary factual information accurately;
5. promptly inform the designated EMCS Child Safeguarding Focal Point; and
6. follow the applicable referral and reporting procedure.

Information should only be shared with persons who need it for safeguarding and reporting purposes.
In Malta, Child Protection Services operate within the legal framework established by the *Minor Protection (Alternative Care) Act*, Chapter 602[2]. Applicable legislation and official guidance set out reporting requirements for professionals in cases involving knowledge or strong suspicions of child maltreatment. EMCS personnel must comply with any statutory reporting obligations applicable to their roles. Internal reporting to the Child Safeguarding Focal Point must not delay any external report required by law or urgent action necessary to protect a child from harm.

## 4.4 Privacy and Data Protection

Personal information concerning children will be collected only where necessary for legitimate project, research or evaluation purposes and handled in accordance with applicable data-protection requirements and EMCS procedures.

Where personal data is collected for research, EMCS shall provide a clear and accessible privacy notice explaining how the data will be collected, used, disclosed and protected, the purpose of processing, how long the data will be retained, and how participants may contact EMCS with questions or concerns. Any intended re-contact shall be explained and the required agreement obtained. Personal data shall not be retained longer than necessary for the purpose for which it was collected and shall thereafter be anonymised or deleted, subject to applicable legal requirements and the provisions of the ICC/ESOMAR International Code.

Participants and, where appropriate, their parents or legal guardians shall be informed how to contact EMCS to exercise applicable data-protection rights or raise questions or concerns about the collection, use, storage or disclosure of personal data. Requests shall be handled in accordance with applicable data-protection requirements.

Personal data relating to children shall only be disclosed to clients, project partners or other third parties in accordance with Articles 2(c) and 6(a) of the ICC/ESOMAR International Code and applicable law. EMCS shall obtain the required consent from a parent, legal guardian or responsible adult for disclosures covered by Article 2(c), unless disclosure is authorised by law. Where Article 6(a) applies, the required consent to the specific purpose for which the data will be used and agreement to the transfer shall also be obtained. Any disclosure required or authorised by law for safeguarding purposes shall be handled in accordance with applicable legal requirements and EMCS's safeguarding procedures. Disclosures shall be limited to what is necessary and shared securely with appropriate recipients. Before transferring personal data to clients, subcontractors or other third-party service providers, EMCS shall ensure that the recipients maintain at least equivalent security measures and comply with applicable data-protection and data-breach requirements.

Where possible:

- evaluation data will be anonymised or pseudonymised;
- reports will use aggregate data;

[2] Available online at: https://legislation.mt/eli/cap/602/eng/portalpdf Last accessed 19/10/2026

- access to identifiable information will be restricted;
- safeguarding records will be separated from general evaluation data where appropriate;
- photographs, recordings or identifiable quotations will only be collected, used, stored or disclosed where there is an appropriate lawful basis, any required consent or authorisation has been obtained, and applicable data-protection and safeguarding requirements have been met;
- identifying information will not be disclosed in publications or dissemination outputs unless appropriately authorised, consistent with applicable law and consent requirements, and compatible with safeguarding and confidentiality obligations.

## 4.5 Partnership and Third-Party Activities

Where EMCS works with partners, clients, subcontractors or venues in activities involving children, safeguarding responsibilities and reporting arrangements must be clarified before the activity begins. Relevant third parties must either operate appropriate safeguarding measures of their own or agree to comply with the safeguarding requirements applicable to the activity.

# 5. STANDARD 4: ACCOUNTABILITY

## 5.1 Monitoring and Review

EMCS will monitor implementation and effectiveness of this Policy and integrate child safeguarding into relevant project-management, quality-assurance and risk-management processes.
Monitoring will include, as applicable:

- confirmation that safeguarding risk assessments have been completed and appropriate mitigation measures implemented;
- confirmation that relevant staff and other personnel have received appropriate safeguarding induction, briefing and training;
- review of safeguarding arrangements for activities involving children, including supervision, safe participation and the suitability of relevant personnel;
- confirmation that safeguarding concerns are recorded, referred and followed up appropriately in accordance with established safeguarding procedures;
- review of lessons arising from activities or incidents;
- identification of required corrective actions.

Monitoring findings, significant safeguarding issues and outstanding corrective actions will be documented and reported through the appropriate management structures. Safeguarding records and reports will be handled securely and shared only with those who need the information for legitimate safeguarding purposes. Confidentiality will be maintained in accordance with applicable requirements and will not prevent necessary protective action or mandatory reporting.

## 5.2 Complaints and Feedback

Children participating in EMCS activities and, where appropriate, their parents or carers, will be informed in age-appropriate and accessible language of how they can:

- raise a safeguarding concern or report suspected abuse, exploitation, neglect or other harm;
- make a complaint;
- provide feedback about their participation and experiences; and
- access appropriate support and information about available next steps.

EMCS will provide safe and accessible ways for children to raise concerns, including reporting routes that do not require them to approach the person who is the subject of a complaint. Reporting arrangements will take account of children's ages, communication needs, disabilities and other relevant barriers to disclosure.

Complaints or concerns raised by children will be taken seriously, treated respectfully and addressed promptly, sensitively and in a child-centred manner. Concerns will be referred through the appropriate safeguarding procedures, assessed for immediate risks and escalated to relevant authorities or services where required. Children will be given appropriate information about the handling of their concern, subject to safeguarding, privacy and confidentiality requirements.

No child will be disadvantaged, intimidated or subjected to retaliation for raising a concern or making a complaint in good faith. Information will be shared on a need-to-know basis, subject to applicable safeguarding and reporting obligations.

## 5.3 Policy Review

This Policy will be reviewed annually and whenever:

- safeguarding legislation, regulatory requirements or other applicable obligations materially change;
- EMCS significantly changes the nature, scale or context of its work with children;
- an incident, complaint or safeguarding concern identifies weaknesses in existing arrangements; or
- monitoring, evaluation or feedback indicates that existing safeguards require improvement.

The review will consider the effectiveness of safeguarding arrangements, the accessibility of complaints mechanisms, lessons learned and the implementation of previous corrective actions. Revisions will be approved through the appropriate EMCS management arrangements, communicated to relevant personnel and reflected in updated procedures, staff training and activity design. The review date and any approved revisions will be documented.

**Policy owner:** EMCS Advisory Ltd
**Designated Child Safeguarding Focal Point:** Eszter Kosa
**Date of Policy:** 29/10/2026
**Review date:** 29/10/2027

EMCS Advisory Ltd.
Centris Business Gateway II
Level 4,
Triq is-Salib tal-Imriehel Zone 3,
Central Business District
Birkirkara CBD3020
Malta.

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