



CRC POZUELO RUGBY

**PROTOCOL FOR THE COMPREHENSIVE
PROTECTION OF CHILDREN AND ADOLESCENTS
AGAINST VIOLENCE**

*Spanish Organic Law 8/2021, of 4 June, on the comprehensive protection of children and adolescents against violence
(LOPVI) · English translation*

September 2026 · Version 2.0

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Protocol identification

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This document is an English translation of the Spanish «Protocolo de Actuación para la Protección Integral a la Infancia y la Adolescencia frente a la Violencia» of CRC Pozuelo, provided for information purposes. Quotations from Spanish legislation are unofficial translations. In the event of any discrepancy, the Spanish version shall prevail.

1. Rationale

This protocol has been drawn up in compliance with Chapter IX, Articles 47 and 48, of Spanish Organic Law 8/2021, of 4 June, on the comprehensive protection of children and adolescents against violence (hereinafter, LOPIVI or Organic Law 8/2021). Its purpose is to fulfil this legal mandate until the protocol approved by the competent public administration is published and comes into force, and it is based on the model protocol of the Madrid Rugby Federation (Federación de Rugby de Madrid, FRM).

Given how important the presence of minors is in the Club's activity, CRC Pozuelo, aware of the importance of protecting them from any hint of violence, will apply this protocol to all its activities. It will remain in force until the procedure approved by the competent public administration comes into force, at which point it will be updated.

Our ultimate goal is the protection of minors in rugby, seeking to eradicate violence in all its forms and making the Club and its activities a safe, well-treating and inclusive environment for sport.

To this end, we adopt as our own the aims set out in Article 3, letters a) to e), of Organic Law 8/2021:

- a) To guarantee the implementation of awareness-raising measures for the rejection and elimination of all types of violence against children and adolescents, providing public authorities, children, adolescents and families with effective instruments in all spheres, social networks and the Internet, especially in the family, education, health, social services, the judicial sphere, new technologies, sport and leisure, the Administration of Justice and the Security Forces.*
- b) To establish effective prevention measures against violence towards children and adolescents, through adequate information for children and adolescents, the specialisation and improvement of professional practice in the different areas of intervention, support for families, providing them with positive parenting tools, and the strengthening of the participation of minors.*
- c) To promote the early detection of violence against children and adolescents through interdisciplinary, initial and ongoing training of professionals who have regular contact with children and adolescents.*
- d) To strengthen the knowledge and skills of children and adolescents so that they play an active part in promoting good treatment and are able to recognise violence and react to it.*
- e) To strengthen the exercise of the right of children and adolescents to be heard, listened to and to have their opinions duly taken into account in contexts of violence against them, ensuring their protection and avoiding secondary victimisation.*

2. Legal framework

Article 3(m) of the LOPIVI establishes the following as one of the aims of the law:

To establish the protocols, mechanisms and any other measures necessary for the creation of safe, well-treating and inclusive environments for all children in all the spheres covered by this law in which minors live their lives. A safe environment shall be understood as one that respects the rights of children and promotes a physically, psychologically and socially protective environment, including the digital environment.

For the sport and leisure sphere, Organic Law 8/2021 devotes Chapter IX, Articles 47 and 48. Article 47 regulates the «Protocols for action against violence in the sport and leisure sphere»:

Public administrations, within the scope of their competences, shall regulate action protocols setting out the actions to build a safe environment in the sport and leisure sphere and to be followed for the prevention, early detection and intervention in possible situations of violence against children and adolescents within the sport and leisure sphere.

These protocols must be applied in all centres carrying out sport and leisure activities, regardless of their ownership and, in any case, in the Network of High Performance and Sports Development Centres, Sports Federations and municipal Schools.

Likewise, Article 48, «Entities that regularly carry out sport or leisure activities with minors», provides that:

1. Entities that regularly carry out sport or leisure activities with minors are obliged to:

- a) Apply the action protocols referred to in the previous article adopted by the public administrations in the sport and leisure sphere.
- b) Implement a monitoring system to ensure compliance with the above protocols in relation to the protection of minors.
- c) Appoint a Protection Officer to whom minors can turn to express their concerns, and who will be responsible for disseminating and ensuring compliance with the established protocols, as well as for initiating the relevant communications in cases where a situation of violence against children or adolescents has been detected.
- d) Adopt the necessary measures so that the practice of sport, physical activity, culture and leisure is not a setting for discrimination on the grounds of age, race, disability, sexual orientation, sexual identity or gender expression, or any other personal or social circumstance, working with the children and adolescents themselves, as well as with their families and professionals, to reject the use of insults and degrading and discriminatory expressions.
- e) Encourage the active participation of children and adolescents in all aspects of their education and integral development.
- f) Encourage and strengthen relations and communication between sports organisations and parents or those exercising guardianship, custody or foster care.

2. Furthermore, in addition to the training referred to in Article 5, those working in these entities must receive specific training to adequately address the different aptitudes and abilities of children and adolescents with disabilities in order to promote and develop inclusive sport for them.

The LOPIVI came into force twenty days after its publication in the Spanish Official State Gazette (BOE), and its twenty-fifth final provision granted a period of six months for the implementation of sections b) and c) of Article 48.

CRC Pozuelo, taking a proactive approach to creating safe environments for its minors, will apply this protocol from the moment of its approval, without prejudice to its update when the public administrations develop the protocols provided for in Article 47.

3. Purpose and scope

The purpose of this protocol is to comply effectively with Article 3 of the LOPIVI, creating «safe, well-treating and inclusive environments».

To this end, by way of example and without limitation, CRC Pozuelo aims through this protocol to:

- Seek the total eradication of any form of violence against minors within the Club.
- Define and implement a catalogue of actions to prevent violence, abuse and exclusionary behaviour.

- Raise awareness among, train and inform everyone involved in the Club, whether board members, coaches, team managers, referees, volunteers or players, as well as their parents, relatives and close circle.
- Provide the Club with a qualified Protection Officer who responds to every request and channels every communication, whether a suggestion or a complaint.
- Open and publicise a permanent communication channel with everyone directly or indirectly related to the Club.
- Introduce measures so that sport is practised under conditions of equality.
- Encourage and strengthen relations with the Madrid Rugby Federation and with other clubs and sports organisations.

This protocol applies to the Board of Directors, coaches, team managers, technical and medical staff, collaborators and volunteers of the Club, as well as to all persons or entities who, directly or indirectly, are related to the Club or benefit from its work, with special emphasis on underage players, their parents, relatives and close circle.

4. Definitions

The guiding concept of this protocol is the **best interests of the child**, regulated in Article 2 of Spanish Organic Law 1/1996, of 15 January, on the Legal Protection of Minors, which, given its importance, is reproduced below:

- 1. Every minor has the right to have his or her best interests assessed and considered as paramount in all actions and decisions concerning him or her, in both the public and private spheres. In the application of this law and other rules affecting them, as well as in measures concerning minors adopted by public or private institutions, the Courts or legislative bodies, the best interests of minors shall prevail over any other legitimate interest that may arise.*
- 2. Limitations on the legal capacity of minors shall be interpreted restrictively and, in any case, always in the best interests of the minor.*
- 3. For the purposes of interpreting and applying the best interests of the minor in each case, the following general criteria shall be taken into account, without prejudice to those established in the applicable specific legislation, as well as any others that may be considered appropriate in the specific circumstances of the case:*
 - a) The protection of the minor's right to life, survival and development and the satisfaction of his or her basic needs, material, physical and educational as well as emotional and affective.*
 - b) Consideration of the minor's wishes, feelings and opinions, as well as his or her right to participate progressively, according to age, maturity, development and personal evolution, in the process of determining his or her best interests.*
 - c) The desirability of the minor's life and development taking place in an adequate family environment free from violence. Remaining with the family of origin shall be prioritised and family relationships maintained, whenever possible and positive for the minor. Where a protection measure is agreed, family foster care shall be prioritised over residential care. Where the minor has been separated from his or her family, the possibility and desirability of return shall be assessed, taking into account the evolution of the family since the protective measure was adopted and always giving priority to the interests and needs of the minor over those of the family.*
 - d) The preservation of the minor's identity, culture, religion, convictions, sexual orientation and identity or language, as well as non-discrimination on these or any other grounds, including disability, guaranteeing the harmonious development of his or her personality.*

4. These criteria shall be weighed taking into account the following general elements:

- a) The age and maturity of the minor.
- b) The need to guarantee equality and non-discrimination due to particular vulnerability, whether due to lack of a family environment, abuse, disability, sexual orientation and identity, refugee status, asylum seeker or subsidiary protection status, membership of an ethnic minority, or any other relevant characteristic or circumstance.
- c) The irreversible effect of the passage of time on the minor's development.
- d) The need for stability of the solutions adopted to promote the effective integration and development of the minor in society, as well as to minimise the risks that any change in material or emotional circumstances may cause to his or her personality and future development.
- e) Preparation for the transition to adulthood and independence, in accordance with his or her abilities and personal circumstances.
- f) Any other elements of assessment which, in the specific case, are considered relevant and respect the rights of minors.
- g) The above elements shall be assessed jointly, in accordance with the principles of necessity and proportionality, so that the measure adopted in the best interests of the minor does not restrict or limit more rights than those it protects.

5. Where any other legitimate interest concurs with the best interests of the minor, priority shall be given to measures which, while responding to that interest, also respect the other legitimate interests present. Where not all concurring legitimate interests can be respected, the best interests of the minor shall prevail over any other legitimate interest. Decisions and measures adopted in the best interests of the minor shall in all cases take into account the fundamental rights of other persons who may be affected.

6. Any decision of any jurisdiction and any measure in the best interests of a minor shall be adopted with due procedural guarantees and, in particular:

- a) The rights of the minor to be informed, heard and listened to, and to participate in the process in accordance with the regulations in force.
- b) The involvement of qualified professionals or experts in the process. Where necessary, these professionals must have sufficient training to determine the specific needs of children with disabilities. In particularly significant decisions affecting the minor, a collegiate report from a specialised technical and multidisciplinary group shall be obtained.
- c) The participation of the parents, guardians or legal representatives of the minor, or of a judicial defender if there is a conflict of interest or disagreement with them, and of the Public Prosecutor, in defence of the minor's interests. A conflict of interest shall be presumed where the opinion of the minor is contrary to the measure adopted concerning him or her or entails a restriction of his or her rights.
- d) The adoption of a decision whose reasoning includes the criteria used, the elements applied in weighing the criteria against each other and against other present and future interests, and the procedural guarantees respected.
- e) The existence of remedies allowing the review of a decision that has not considered the best interests of the minor as paramount, or where the minor's own development or significant changes in the circumstances that led to the decision make a review necessary. Minors shall be entitled to free legal aid in the cases provided for by law.

Article 1.2 of the LOPIVI defines violence against minors as:

Any action, omission or negligent treatment that deprives minors of their rights and well-being, that threatens or interferes with their orderly physical, mental or social development, regardless of its form and means of commission, including that carried out through information and communication technologies, especially digital violence.

In any case, violence shall be understood to include physical, psychological or emotional abuse, physical, humiliating or degrading punishment, neglect or negligent treatment, threats, insults and slander, exploitation, including sexual violence, corruption, child pornography, prostitution, school bullying, sexual harassment, cyberbullying, gender-based violence, genital mutilation, trafficking in human beings for any purpose, forced marriage, child marriage, unsolicited access to pornography, sexual extortion, public dissemination of private data, as well as the presence of any violent behaviour in their family environment.

By contrast, Article 1.3 provides that:

For the purposes of this law, good treatment is understood as that which, while respecting the fundamental rights of children and adolescents, actively promotes the principles of mutual respect, human dignity, democratic coexistence, peaceful resolution of conflicts, the right to equal protection under the law, equal opportunities and the prohibition of discrimination against children and adolescents.

In more detail, the following specific concepts can be defined:

Bullying or harassment: also referred to as intimidation between peers or peer abuse. The following types can be distinguished:

1. **Verbal.** Direct: unwanted nicknames, insults, threats, mockery, etc. Indirect: negative comments, rumours of a sexual or racist nature, or false, degrading testimonies or acts against others.
2. **Physical.** Direct: personal assaults, individually or in a group, such as hitting, pushing, kicking, locking someone in, etc. Indirect: damage to belongings, such as stealing, breaking or hiding objects.
3. **Social.** Direct: excluding the person from their reference group. Indirect: indifference towards the person, treating them as if they did not exist.
4. **Psychological.** The use of threats to manipulate a child or adolescent, including intimidation, manipulation and even blackmail.
5. **Sexual or sex-based.** Under Article 7 of Spanish Organic Law 3/2007, of 22 March, on effective equality between women and men, sexual harassment is any verbal or physical behaviour of a sexual nature that has the purpose or effect of violating the dignity of a person, in particular when it creates an intimidating, degrading or offensive environment; and sex-based harassment is any behaviour carried out on the basis of a person's sex with the purpose or effect of violating their dignity and creating an intimidating, degrading or offensive environment.
6. **Homophobic.** That carried out by someone who shows aversion to homosexuality or to homosexual people, also including bisexual, transgender or non-binary people.
7. **Cyberbullying.** Harassment by technological means, through threatening, intimidating or blackmailing messages.

Abuse or grooming: understood as an abuse of power, defined by the Royal Spanish Academy as treating dishonestly a person of lesser experience, strength or power. It requires a hierarchical relationship, formal or informal, that enables harmful physical or psychological actions. In most cases, alongside this relationship of superiority there is a position of trust between the minor and that adult. This abuse, generally committed in private and secretly, is usually perpetrated by people in the minor's closest circle. The same types as in bullying can be distinguished, although the relationship between peers must be differentiated from the superior-subordinate relationship.

Risk groups: people who share characteristics that expose them to a greater risk of suffering violence. In accordance with Organic Law 8/2021, we distinguish:

1. **Girls and boys, on grounds of gender.** As the Preamble of the LOPIVI states, because of their age and sex they are often doubly discriminated against or attacked.
2. **Minors with disabilities, because of their vulnerability.** The Preamble highlights that they are particularly sensitive and vulnerable to this violence, and Article 9.2 requires their needs, and those of anyone in a situation of particular vulnerability, to be taken into account.
3. **LGTBI groups and racial or ethnic groups.** Article 5.4 requires training actions to take particular account of the gender perspective, as well as of the needs of minors with disabilities, of diverse racial, ethnic or national origin, in a situation of economic disadvantage, belonging to the LGTBI community, and of unaccompanied minors.

Risk activities: the activities carried out by the Club include, among others:

- Training sessions for all age groups.
- Matches and competitions in the federation calendar.
- Tournaments and friendly matches.
- Training camps and squad gatherings.
- Trips and travel, with or without overnight stays.
- Camps and clinics.
- Training courses.
- Club social activities (third half, parties, events).
- Others.

5. CRC Pozuelo as a safe, well-treating and inclusive environment

Article 1.1 of Organic Law 8/2021 sets out the purpose of the law:

The purpose of this law is to guarantee the fundamental rights of children and adolescents to their physical, mental, psychological and moral integrity against any form of violence, ensuring the free development of their personality and establishing comprehensive protection measures, including awareness-raising, prevention, early detection, protection and reparation of harm in all spheres in which their lives take place.

The appropriate way to ensure that the rights of minors are respected is to guarantee their integrity, making the Club a safe environment for girls, boys and adolescents. A safe environment is one free from violence, as defined in Article 1.2 of the LOPIVI quoted in the previous section.

As well as being safe, the Club must be a well-treating and inclusive environment, in accordance with Article 1.3 of the same law:

For the purposes of this law, good treatment is understood as that which, while respecting the fundamental rights of children and adolescents, actively promotes the principles of mutual respect, human dignity, democratic coexistence, peaceful resolution of conflicts, the right to equal protection under the law, equal opportunities and the prohibition of discrimination against children and adolescents.

6. The Club's Protection Officer

Article 48.1 of the LOPIVI provides that all entities that regularly carry out sport or leisure activities with minors are obliged to appoint a protection officer.

CRC Pozuelo has appointed **Mr Luis Felipe Bressend Martínez** as Welfare and Protection Officer. A lawyer with more than twenty years of experience in the legal aid service for Minors of the Madrid Bar Association (member no. 68,841) and a mediator registered with the Alcalá de Henares Bar Association (member no. 3,894), he is available to anyone who needs to contact him at:

lopivi@crcpozuelorugby.com

In extreme or very urgent situations, by phone call or WhatsApp at:

+34 666 985 864

The Officer's primary role, as set out in Article 48.1.c) of the LOPIVI, is to be always available so that:

minors can turn to him to express their concerns, and he will be responsible for disseminating and ensuring compliance with the established protocols, as well as for initiating the relevant communications in cases where a situation of violence against children or adolescents has been detected.

In addition to this primary role, the Officer will have the following duties:

- a) All matters arising from the application and implementation of the protocol.
- b) Channelling and processing concerns, suggestions, complaints, claims or reports made in situations of violence, with the power to open fact-finding files whose conclusions will be referred to the Club's Board of Directors or, where appropriate, to the disciplinary bodies of the Madrid Rugby Federation, so that the relevant disciplinary proceedings can be opened.
- c) Reporting to the authorities any situations of violence against minors that have occurred.
- d) Proposing to the Club's Board of Directors the precautionary, preventive or protective measures he considers appropriate in situations of violence that may affect minors.
- e) Issuing reports, instructions or recommendations on any matters requested by any body of the Club or by any other public or private body.
- f) Proposing the amendment or review of the protocol to adapt it to particular situations or needs.

Mr Luis Felipe Bressend Martínez, as the Club's Protection Officer, will be CRC Pozuelo's point of contact with the Madrid Rugby Federation in all matters relating to the application of this protocol and the protection of minors.

7. Ten guiding principles of the protocol

Our protocol will always be governed by these ten guiding principles, listed in order of importance:

1. **Leadership by the Club's Presidency.** Regulatory compliance and, therefore, the development and implementation of this protocol, including the appointment of the Protection Officer, is always led by the Club's Presidency.
2. **Best interests of the child.** A legal interest defined and protected by Spanish Organic Law 1/1996 on the Legal Protection of Minors, which can be summarised in the first sentence of its Article 2: every minor has the right to have his or her best interests assessed and considered as paramount in all actions and decisions concerning him or her, in both the public and private spheres.
3. **Protection of children and adolescents against violence.** The Club will direct all its actions, from the implementation of measures to the activities in which minors take part, towards keeping them free from any hint of violence.
4. **The Club and its sphere of influence as a safe, well-treating and inclusive environment.** The Club's facilities and activities will be safe environments for those who take part in or visit them, with special

emphasis on those under 18, and will be characterised by good treatment, with no possibility of exclusion on the grounds of sex, gender, race, religion, social characteristics or others.

5. **Rights of the child.** Every minor linked to the Club holds the rights recognised by our legal system: those recognised by the Spanish Constitution and the International Treaties to which Spain is a party, especially the United Nations Convention on the Rights of the Child and the Convention on the Rights of Persons with Disabilities; the right to honour, privacy and one's own image; the right to information; freedom of thought and the right to non-discrimination; the right to participation, association and assembly; freedom of expression; and the right to be heard and listened to.
6. **Respect for the sexual orientation and gender identity of minors.** Everyone related to the Club has the right to express and live freely their sexual orientation and gender identity. The Club will support and provide the necessary assistance, within its means, to any victim who requires it, working actively to eradicate this type of violence.
7. **Information, awareness-raising and training of all stakeholders.** Information, awareness-raising and training actions for board members, coaches, team managers, collaborators, volunteers, suppliers, parents, relatives and the close circle of players will be an essential part of the Club's annual activity.
8. **Empathy and socialisation.** All the Club's actions, especially those aimed at correcting attitudes contrary to this protocol, will be governed by the principles of socialisation and values-based education, fostering empathy between people, especially with minors.
9. **Proportionality.** Before being applied, every measure must have been analysed, concluding that it is suitable to achieve the intended aims, that it is the least intrusive of the possible options and that it is proportionate between the punitive burden and the interest to be redressed.
10. **Prevention as a priority.** The decalogue closes with the principle that gives meaning to the other nine: eradicating violence and creating safe and inclusive environments would not be possible without working from the outset on all the factors that make it possible to prevent any situation of violence.

8. The Club's Presidency, the key figure of the protocol

Any change in an organisation, and implementing a new protocol is one, has an impact on the people related to it. For this reason, the President of the Club, as the highest representative of the entity, must lead the implementation of this protocol, being its key figure.

The first action of the President, Mr Javier Balmaseda Rech, will be to publish the Institutional Declaration of Principles and Commitment to the Comprehensive Protection of Children and Adolescents against Violence, a public statement of the Club's commitment to keeping its facilities and activities as safe, well-treating and inclusive environments for all minors.

Annex I contains this Institutional Declaration.

9. Prevention and protection: the core elements of the protocol

The Royal Spanish Academy defines prevention as the preparation and arrangements made in advance to avoid a risk or carry out something, and to protect as to shelter, favour or defend someone or something.

By implementing this protocol and deploying the actions aimed at creating a safe, well-treating and inclusive environment, the Club develops the first of these elements, prevention, helping to guarantee the fundamental rights of children and adolescents to their physical, mental, psychological and moral integrity against any form of violence, as stated in Article 1.1 of the LOPIVI.

The second element, protection, is the set of actions that the Club will carry out to reduce the scope and consequences of any situations of violence that may occur.

The prevention of violence will be based on:

- Information.
- Awareness-raising.
- Training, which will entail applying the concepts and actions implemented.

The protection of people will be applied through:

- Detection procedures.
- Procedures for responding to violence.

10. Prevention: catalogue of measures

This section, as part of the first version of the protocol, sets out a list of preventive measures that knowledge and experience will allow us to complement in future versions. All of them aim to prevent violent attitudes and actions towards minors and to ensure that playing rugby at the Club contributes positively to their growth as people.

10.1 Measures to prevent violence

10.1.1 Information, awareness-raising and training actions

The Club will produce or disseminate information guides on Organic Law 8/2021, either its own or those published by the Madrid Rugby Federation or other bodies, explaining the legal interest it protects and the rights and duties of those involved. These guides will be aimed at children and adolescents by age group (0 to 6, 7 to 12 and 13 to 17 years), at parents and at the people of the Club (board members, coaches, team managers, collaborators, volunteers and suppliers). The Club may also disseminate videos aimed at these same groups.

This material will be updated every season and published on the Club's website at the start of each season, and will be duly disseminated through the managers of each age group and the parents' groups. This protocol and its annexes will also be published on the Club's website, available to anyone who wishes to consult them.

These actions will be complemented by face-to-face or online sessions, at the start of the season or when a relevant event requires it, in which the Protection Officer will explain the regulations, rights and duties and the role of each person, answering attendees' questions.

10.1.2 Specific prevention actions

a) Communication channel

Aware of the importance of prompt and correct reporting of violent or suspicious attitudes or actions, the Club provides coaches, team managers, board members, volunteers, players, parents, guardians, relatives and anyone else related to the Club, even indirectly, with a free and permanent communication channel to report, communicate or denounce any situation that may be violent or lead to violence against minors:

lopivi@crcpozuelorugby.com

For serious or urgent cases, by phone or WhatsApp at:

+34 666 985 864

These details will be given the widest possible publicity on the Club's website, social media, facilities and communication groups. It is very important to remind people of them regularly, as rapid detection prevents violence, and therefore its consequences, from getting worse.

b) Codes of conduct

A code of conduct is a formal declaration of principles setting out the values and ethical standards that guide an organisation; it is a self-regulation measure. The Club has codes of conduct for:

- Board members, coaches, team managers, collaborators, volunteers and suppliers of the Club.
- Parents, legal representatives and relatives of underage players.
- Underage players.

Everyone in these groups must know and commit to complying with the codes of conduct, which will be published at the start of each season on the Club's website. **Annex II** contains the models for each of them.

c) Regulations and contractual clauses

The Club will keep its statutes and internal regulations up to date, as far as possible, with regard to this law and future provisions. Employment, volunteering or service contracts of people who carry out activities with minors will include a clause for the prevention of violent acts against minors.

d) Negative certificate from the Central Register of Sex Offenders

The Club will scrupulously comply with Articles 57 and 58 of the LOPIVI regarding the negative certificate from the Central Register of Sex Offenders and Human Trafficking:

Article 57.1. It shall be a requirement for access to and exercise of any profession, trade or activity involving regular contact with minors not to have been convicted by final judgment of any offence against sexual freedom and integrity defined in Title VIII of the Spanish Criminal Code, as well as of any offence of trafficking in human beings defined in Title VII bis of the Criminal Code. To this end, anyone seeking access to such professions, trades or activities must prove this circumstance by providing a negative certificate from the Central Register of Sex Offenders.

Article 57.2. For the purposes of this law, professions, trades and activities involving regular contact with minors are all those, paid or unpaid, which by their very nature and essence involve repeated, direct and regular, and not merely occasional, contact with children or adolescents, as well as, in any case, all those whose main recipients are minors.

Article 57.3. Companies and entities are prohibited from employing in any profession, trade or activity involving regular contact with minors anyone who has a record in the Central Register of Sex Offenders and Human Trafficking.

Article 58.1. The existence of a record in the Central Register of Sex Offenders and Human Trafficking at the start of the activity in jobs or activities involving regular contact with minors shall make it legally impossible to hire the person.

Article 58.2. The subsequent existence of a record in the Central Register of Sex Offenders and Human Trafficking shall entail the immediate termination of the employment relationship or of the non-employment internship. However, whenever possible, in view of the circumstances of the workplace and the activity carried out there, the company may change the person's job.

Although current regulations do not require it to be renewed, the Club requires the negative certificate to be submitted before first joining any position or activity, paid or voluntary, involving contact with minors (coaches, team managers, physiotherapists, instructors, board members with direct contact, etc.), and a new one to be submitted **every 24 months of activity** or on each new incorporation into the Club.

As regards the concept of regularity, since the contact is with children and adolescents, the nature of the activity rather than its frequency will be decisive in requiring it.

e) Control and supervision

The Club will reinforce its control and supervision measures for the safety of people, especially minors, through the procedures for stands and public areas, changing rooms, toilets and showers, rooms and offices, and trips and camps set out in the annexes.

f) Personal data protection

The Club complies with current data protection regulations (Regulation (EU) 2016/679 and Spanish Organic Law 3/2018). Information and consent clauses, with special attention to those concerning minors, will be reviewed to ensure correct compliance with the legislation on the legal protection of minors, and all documents requiring it will be updated before the start of each season.

g) Communication actions

The rights of minors, the basic rules of good treatment and coexistence and the express prohibition of violent attitudes or actions, with special attention to those motivated by racism, sexism or disability, will be the subject of posters and digital communication, both at the facilities and in regular mailings to players and families.

h) Preventing violence in stands and public areas

Stands and public areas are frequently the scene of violent behaviour, almost always by people outside the game. The Club will not allow these situations to occur at its facilities or in the matches it plays. **Annex III** sets out the corresponding procedure.

i) Preventing violence in changing rooms, toilets and showers

Minors are especially vulnerable in these spaces, where there is less supervision. In particular, bullying between players, which takes place when no adults are present, is especially relevant in changing rooms. **Annex IV** sets out the corresponding procedure.

j) Violence-free use of rooms and offices

Protection is not limited to training areas and changing rooms, but extends to other spaces such as physiotherapy rooms, offices, gyms or storerooms, where situations of violence may also occur. **Annex V** sets out the corresponding procedure.

k) Preventing violence on trips, overnight stays and camps

This procedure guarantees the safety of minors who travel, stay overnight or attend camps, tournaments or clinics organised by the Club. **Annexes VI and VII** set out the procedure and the consent form.

l) Communication and use of images and/or voice on social media

Photographs and videos are very valuable tools for promoting rugby and the life of the Club, but their capture and use must be regulated to maintain an environment free from violence, with special attention to minors. **Annex VIII** sets out the corresponding procedure.

m) Preventing violence at award ceremonies

Every award ceremony generates moments of joy and frustration. To prevent situations of discomfort, mistrust or humiliation, **Annex IX** sets out the procedure to follow.

n) Compromising situations in sport

Annex X contains a catalogue of compromising situations grouped into four categories: general situations and situations arising from verbal communication, from acts or gestures of a sexual nature and from physical contact.

o) Coordination with the Madrid Rugby Federation

The Club will apply this protocol consistently with that of the Madrid Rugby Federation and will request its support and advice when necessary.

11. Protection: detection and response

11.1 Detection

Detecting violent situations or actions requires caution, since the best interests of the child are at stake, as well as the rights of the other people involved. This must not hold us back: detection is essential.

Minors who have suffered violence, especially sexual violence, are vulnerable to suffering new situations of this kind, so it is important to stress that they must not keep the secret that usually protects such situations, and to work on possible solutions.

It is necessary to understand, first, that violence may come from any of the people involved in the Club's activities: players, coaches, technical staff, referees, medical staff, board members, volunteers, suppliers, parents, relatives, friends, spectators, etc. Second, that it may occur during the sporting activity itself or in related activities outside competition. And, furthermore, that it may be generated through any technological means.

These circumstances require us to be permanently alert so as not to underestimate any scenario or any person involved. The indicators that enable detection can be classified into two categories:

- **Specific indicators**, of three types: (1) physical signs in the minor that can be detected by simple observation, as well as direct observation, as witnesses, of a suspicious or violent situation; (2) disclosure of the facts by the victim; and (3) knowledge or behaviours usually associated with experiences of violence in childhood.
- **Non-specific indicators**, more general and associated with any situation of abuse or trauma the minor may have suffered: forced separation from their family, negligent care, physical, psychological or institutional abuse and, at times, sexual violence. Violence by adults is often accompanied by other types of abuse, so these indicators may be associated with one or more of them.

Every adult directly or indirectly related to the Club who witnesses a suspicious attitude or a violent situation or action against a child or adolescent is obliged to report it to the Club's Protection Officer, to the Board of Directors or, depending on the seriousness of the case, to the Police or the Juvenile Prosecutor's Office.

The citizens' duty to report, regulated in Article 15 of the LOPIVI, is reinforced in Article 16.1:

The duty to report provided for in the previous article is especially required of those who, by reason of their position, profession, trade or activity, are entrusted with the assistance, care, teaching or protection of children or adolescents and, in the course thereof, have become aware of a situation of violence against them.

Annex X sets out a list of compromising situations that we can all detect.

11.2 Response

If a person, voluntarily or involuntarily, has caused a violent or suspicious situation within the Club, the Club must give a measured response. In such a situation, the following steps will be taken in this order:

1. **Protect the victim or potential victim**, providing assistance and, where possible, reducing the sources of violence or, in any case, moving the victim away from them.
2. **Report the situation** to the Club's Protection Officer, to the Board of Directors or, depending on the seriousness of the case, to the Police or the Juvenile Prosecutor's Office.

The Protection Officer, the Board of Directors and the Club's Presidency will always support and accompany those who have been or are victims, as well as those who have witnessed violent or suspicious situations.

Reports will be made, whenever possible, using the form in **Annex XI**. If this is not possible due to urgency, the report will be made by phone to the number set out in this protocol. Any verbal report must be confirmed in writing once the urgency has passed, and any report of a suspicious situation must always be made in writing.

Where violent situations occur during matches or sporting activities that cannot be considered to arise from the normal course of play, the coach, team manager or any Club official who witnessed or became aware of the incident will send a report to the Protection Officer, who will assess the action to be taken and, where appropriate, refer it to the Madrid Rugby Federation.

The Protection Officer will issue and record a report assessing the facts and recommending the Club's course of action and, where appropriate, improvements to prevention. The reports of the person aware of the incident and of the Protection Officer will be issued within a maximum of 10 days from becoming aware of the matter.

Every report of a violent or suspicious action will lead to the opening of a fact-finding file within a maximum of 7 calendar days, assessing the incident, its initial seriousness, the way in which it was reported and the data, documents and evidence provided. Depending on its seriousness, the incident may be classified as:

- **Minor:** it will entail internal correction through educational measures or, where appropriate, the application of the Club's disciplinary rules.
- **Serious:** as it poses a risk to the physical or mental health of the victim, it will trigger the process described below.

An investigation will be carried out, in as much detail as possible, in accordance with the principles of confidentiality, speed, prudence and with the utmost sensitivity and respect for the people involved. The views of those directly involved will be taken into account at all times, protecting their rights, confidentiality and compliance with data protection legislation.

Minors will always be accompanied by their parents or guardians and will not be confronted with the alleged aggressor; in any case, their parents or guardians will act on their behalf. Actions will be taken to minimise as far as possible the re-victimisation of the minors involved.

Depending on the nature of the incident, the opinion of coaches, collaborators involved in the activity or specialists may be sought, and the need for immediate measures will be assessed.

If, once studied by the Protection Officer, the situation must proceed, it will be analysed by an **Advisory Committee** made up of:

- The President of the Club, or a person designated by him.
- The Secretary of the Board of Directors.
- The Club's Protection Officer.
- If requested, a legal or psychological adviser or specialist in violence against minors, an independent third party in good faith, appointed by the Club.

This Committee will evaluate all the information gathered, together with the Protection Officer's analysis and conclusions, and will issue a report known only to its members, the President of the Club and whomever he decides. Everything dealt with in the Committee will be confidential, and its members will remain bound by secrecy even after their functions have ended.

In serious cases, and until the file is resolved, the Protection Officer may ask the Board of Directors or the President of the Club to adopt precautionary measures to protect the potential victim, such as the temporary suspension from duties of the person allegedly responsible.

If a report is proved to be false and intended to obtain a sporting advantage, cause the exclusion of a player or coach or damage the reputation or honour of any person, it will be referred to the competent disciplinary bodies.

Every file must be closed. Fact-finding files will be archived for lack of grounds or will lead to the opening of disciplinary proceedings, which may be closed by a decision to archive, on the grounds that no violent action occurred, or with a proposal for corrective action for minor incidents. Serious incidents will conclude with:

1. Referral to the Club's Board of Directors and, where appropriate, to the Disciplinary Committee of the Madrid Rugby Federation, for the opening of the corresponding disciplinary proceedings, if applicable.
2. Referral to the authorities, in accordance with the LOPIVI.

Improvements to this protocol that allow better detection and reduce violent actions within the Club will always be considered.

12. Review and improvement of the protocol

This protocol will be reviewed and updated in the following cases:

- At the request of the Club's Protection Officer.
- Due to amendments to the LOPIVI or applicable legislation, as well as the publication of protocols in the sports sphere by Public Administrations, the competent authorities or the Madrid Rugby Federation.
- If any serious or very serious violent incident is detected in the Club's activities that makes it advisable to review the protocol and adopt new measures.
- In any case, at the end of each season the degree of implementation and any problems or incidents detected will be reviewed.

13. Entry into force

This protocol will come into force on the date of its approval by the Club's Board of Directors and will be published, together with its annexes, on the Club's website.



CRC POZUELO RUGBY

CRC POZUELO RUGBY

ANNEXES TO THE PROTOCOL FOR THE COMPREHENSIVE PROTECTION OF CHILDREN AND ADOLESCENTS AGAINST VIOLENCE

*Spanish Organic Law 8/2021, of 4 June, on the comprehensive protection of children and adolescents against violence
(LOPIVI) · English translation*

September 2026 · Version 2.0

ANNEX I

Institutional Declaration of Principles and Commitment to the Comprehensive Protection of Children and Adolescents against Violence

CRC Pozuelo publicly commits to the goal of promoting and maintaining a safe and inclusive environment for minors, free from violence.

In accordance with this commitment, the Club declares that violence against a minor, in any of its forms, is a serious violation of their dignity and fundamental rights.

We therefore undertake to:

- Not allow or tolerate under any circumstances any violent behaviour, attitudes or situations towards our girls, boys and adolescents.
- Listen to everything a minor has to tell us, without ignoring their complaints, claims or reports of harassment that may arise within the Club.
- Receive and process rigorously and promptly, with due guarantees of legal certainty, confidentiality, impartiality and the right of defence of those involved, all complaints, claims and reports that may arise.
- Guarantee that there will be no retaliation of any kind against the persons, minors or adults, who make complaints, claims or reports, or against those who take part in resolving them.
- Sanction anyone who harasses or uses violence, according to the circumstances of their behaviour.

To make this commitment effective, the Club requires everyone who is part of it, especially board members, coaches and team managers, to take on the following responsibilities:

- Treat everyone, and especially minors, with respect for their dignity and fundamental rights.
- Avoid behaviour, attitudes or actions that are or may be offensive, humiliating, degrading, upsetting, intimidating or hostile.
- Act appropriately in the face of such behaviour: not ignoring or tolerating it, expressing disagreement, preventing it from being repeated or getting worse, reporting it to the designated persons and supporting those who suffer it.

For its part, the Club undertakes to comply rigorously with the measures established by the competent public administrations and with the provisions of its Protocol for the Comprehensive Protection of Children and Adolescents against Violence.

Signed in Pozuelo de Alarcón, on 25 September 2026




CRC POZUELO RUGBY
AV. JUAN ANTONIO SAMARANCH TORRELLÓ 8
POLIDEPORTIVO VALLE DE LAS CAÑAS 28223
CIF: V83417170 696 16 78 05

Mr Javier Balmaseda Rech
President of CRC Pozuelo

ANNEX II

Codes of Conduct

II.A · Board members, coaches, team managers, collaborators, volunteers and suppliers

I, _____, with ID no. _____, in my capacity as _____ of CRC Pozuelo, being of legal age and fully responsible for my actions, share the Club's values and therefore declare my commitment to creating and maintaining a safe and protective environment for our minors, respecting the rights and freedoms of everyone involved, with special attention to children and adolescents.

I also undertake to:

- Make the well-being and safety of minors the guiding principle of my activity, above any sporting result.
- Attend all training provided by the Club on this subject and put what I learn into practice.
- Respect the dignity and rights of all people, rejecting any discrimination on the grounds of sex, age, race, skin colour, ethnicity, origin, language, religion, ideology, disability, sexual identity or orientation, physical appearance, economic status, etc.
- Ensure equal treatment, without favouritism.
- Inform the Protection Officer of any circumstance suspected of undermining safety, good treatment and inclusion at the Club.
- Listen to the Protection Officer and act accordingly on any information they pass on to me.
- Set an example with my attitude, avoiding the use of harmful substances and taking care with my verbal and non-verbal language.
- Keep relationships of trust within appropriate limits, avoiding attitudes that suggest excessive familiarity.
- Keep work spaces open and accessible, without physical or psychological barriers.
- Preferably maintain contact with minors in the company of other adults, encouraging a mix of sexes.
- Arrive sufficiently in advance of activities with minors to ensure the necessary protection measures.
- Guarantee a safe and protective environment in all my activities, using positive and safe techniques and methods.
- Relate positively and openly with the families of minors.
- Act proactively to ensure the rules are followed, rejecting any type of violence.
- Comply with personal data protection regulations and the basic rules of confidentiality.
- Not allow or take part in games involving provocation, inappropriate acts or inappropriate contact.
- Not be alone with minors under my responsibility or transport them in my private vehicle without the express authorisation of their parents or guardians, except in an emergency requiring immediate assistance, in which case I will inform a colleague, the Board of Directors or the Protection Officer.
- Not establish with minors under my responsibility any relationship other than the sporting one.
- Not enter changing rooms, physiotherapy or rest rooms when only minors are present, except in an emergency, informing colleagues or the Protection Officer if possible, and except at pre-arranged times to give instructions, line-ups, etc.
- Not use technology inappropriately towards the people I interact with at the Club.

Finally, I have the right to:

- Enjoy my activity and have the Club's support to carry it out safely.

- Receive information and training to guarantee a safe, well-treating and inclusive environment, and for my development as a coach or collaborator.
- Be respected and treated fairly by the Club's governing bodies.
- Not be pressured or forced to carry out actions that breach the regulations or this code of conduct.
- Be protected against any form of violence or harmful situation against me, whether by any member of the Club, minors or their relatives.

I have been informed and accept that any breach of the commitments in this Code of Conduct will have immediate consequences, which, depending on their seriousness, may include the temporary or permanent suspension of my relationship with the Club.

Signed in _____, on _____

Signature

II.B · Parents, legal representatives and relatives of minors

I commit to creating and maintaining a safe and protective environment for our minors, respecting the rights and freedoms of everyone involved, with special attention to children and adolescents. I also undertake to:

- Respect the Club's codes of conduct, regulations, protocols and procedures, as well as the rules of the facilities I attend.
- Encourage the participation of players.
- Respect referees, coaches, team managers and technical staff of all teams.
- Encourage my child or the minor in my care to play rugby respecting the rules and other people, and to improve and learn through the game.
- Ensure they are on time for all call-ups and always have the equipment necessary for their safety.
- Ensure they know their code of conduct and the rules they must respect.
- Cooperate with all the people at the Club involved in my child's activity.
- Be realistic and refrain from putting pressure on them or creating false expectations.
- Praise their efforts and recognise their achievements and positive actions.
- Listen to them, taking their worries, doubts and fears seriously.
- Accept the decisions of coaches, team managers and technical staff, behaving responsibly and positively at all times.
- Refrain from publishing or sharing on social media images of minors under 18 beyond strictly sporting ones without express authorisation.
- Act proactively to ensure the rules are followed, rejecting any type of violence.
- Comply with data protection regulations and the basic rules of confidentiality.
- Not use technology inappropriately towards people in the sporting environment.
- Inform the Club of any past or recent health problem of my child that is relevant to playing sport.
- Inform the Protection Officer of any circumstance suspected of undermining safety, good treatment and inclusion, and act accordingly on the information they pass on to me.
- Set an example with my attitude, avoiding the use of harmful substances and taking care with my verbal and non-verbal language.
- Submit on time the documentation required by the Club for regulatory compliance and the proper running of its activities.

Alongside my commitments, I have the right to:

- Know and consult, whenever I need to, the Club's codes of conduct, regulations, protocols and procedures.
- Know and have direct access to the Protection Officer, and have my concerns dealt with as diligently as possible.
- Be informed about the people who interact with my child and their background.
- Be informed of the measures adopted by the Club so that my child is in a safe, well-treating and inclusive environment.
- Be regularly informed, through the established channels, of my child's progress in the activity, and of any problem or potentially harmful situation affecting them.

I have been informed of, share and accept the commitments of this Code of Conduct, and understand that breaching it will have immediate consequences, which, depending on their seriousness, may include the temporary or permanent suspension of permission to attend my child's activities.

Full name: _____ ID no.: _____

Parent/guardian of: _____ Age group: _____

Signed in _____, on _____

Signature

II.C · Underage players

I, _____, a player of CRC Pozuelo in the _____ age group, with ID/passport no. _____, aware of the importance of my commitments to get along with team-mates, coaches and other people at the Club, and having had this Code of Conduct explained to me in a way suited to my age and maturity in the presence of my father, mother or guardian, commit to strengthening the Club's values by helping to create a safe and protective environment for all minors. Therefore:

- I will respect and not damage the facilities or equipment, and will leave them in their place before, during and after the activity.
- I will not leave the facilities without telling my coach or another responsible adult at the Club and getting their permission.
- I will come to the activity with the right equipment and clothing.
- I will respect all the rules, because they help create a safe and protective environment.
- I will go to the Protection Officer, my coach or another responsible adult if I have any doubts about this code or any other rule.
- I will not take any harmful substance at the Club or in activities related to it.
- I will respect everyone related to the Club or my activity.
- I will play fair and show good sportsmanship in victory and defeat.
- I will always greet my opponents, the referees and the coaches and managers of both teams.
- I will accept with good sportsmanship any incident in the game and any decision by the referee or my coaches.
- I will be on time for all the activities I am called to.
- I will tell my coaches about any injuries or possible injuries and about my physical condition.
- I will not discriminate against anyone on the grounds of sex, age, race, skin colour, ethnicity, origin, language, religion, ideology, disability, sexual identity or orientation, physical appearance, economic status, etc.
- I will use technology properly, without creating unsafe, harmful or upsetting situations for anyone at the Club.
- I will not fight with, insult, abuse, harass or make harmful gestures or actions towards anyone related to the Club.
- I will tell the Protection Officer if any adult or minor harasses me, attacks me or behaves suspiciously, and also if I see or know that this is happening to a team-mate.

Alongside my commitments, I have the right to:

- Develop freely and enjoy my activities.
- Feel safe, be valued for who I am and not be discriminated against for any reason, including my sporting ability.
- Have the decisions about my activity, its aims and methods explained to me in a way suited to my age and maturity.
- Speak and be listened to, and have what I say presumed to be true, especially regarding my safety or worries.
- Be informed and helped at all times by any responsible adult at the Club about how to ask for help.
- Not suffer retaliation for having truthfully reported any compromising situation, whoever caused it.

I have been informed of, share and accept the commitments of this Code of Conduct, and I know that breaching it will have consequences, which, depending on their seriousness, may include the temporary or permanent suspension of permission to take part in the Club's activities.

Signed in _____, on _____

Player's signature

Signature of father, mother or guardian

ANNEX III

Procedure for Preventing Violence in Stands and Public Areas

Violent behaviour sometimes comes from spectators at matches; a clear example is insults directed at referees, players or coaches. The Club is committed to making rugby a safe and healthy environment and to preventing such unacceptable behaviour at its facilities and in the matches it plays. To this end, the Club undertakes to:

- Display clearly visible signs or warnings of zero tolerance of violent behaviour in the stands.
- Include a zero-tolerance warning in communications used to publicise or promote matches and tournaments.
- Remind spectators over the public address system, where available, that violence is not tolerated at the facilities.
- At home matches, the ground manager may ask the authorities responsible for the facility to remove anyone shouting insults or behaving violently.
- The ground or team manager will inform the Club's Protection Officer of what happened and issue a report, so that the Club is aware of the incident and, where appropriate, refers it to the Madrid Rugby Federation.
- If the person responsible is a member of the Club or a relative of a Club player, the Board of Directors may adopt immediate measures, such as the temporary or permanent withdrawal of membership or a ban on attending matches and training sessions.
- If the person responsible is a player, coach or member of another group within the Club, the measures provided for in this protocol will apply.

ANNEX IV

Procedure for Preventing Violence in Changing Rooms, Toilets and Showers

Minors are especially vulnerable in these spaces, where there is less supervision. In particular, bullying between players, which takes place when no adults are present, is especially relevant in changing rooms. In addition, the simultaneous use of changing rooms, toilets and showers by adults, sometimes from outside the Club, and by minors is a risk factor. The rules of use must therefore always be visible at the facility, inside and outside the changing rooms, and must be enforced.

The following actions will be applied to minimise the risk of violent behaviour in changing rooms, toilets and showers:

- Access to the changing room will be limited to the time necessary.
- An adult will never enter the changing room alone, but always with another adult, except in exceptional or urgent situations, or when at least 5 users are present.
- If adults and minors share a changing room, there must be separate spaces for changing and showering. Adults must never undress in front of minors.
- At facilities where changing rooms are shared with other users, an area for the exclusive use of minors will be requested or, if this is not possible, minors will use them at different times from adults.
- Adults may not change or shower at the same time as children and adolescents in the same changing room.
- In mixed activities, separate changing rooms by sex will be provided.
- Transgender people may request a private changing room or, if this is not possible, a separate time slot.
- If a minor feels uncomfortable changing or showering with others, they will not be pressured; they will be encouraged to shower at home.
- Changing rooms will be made accessible to people with disabilities.
- The use of mobile phones, cameras or any photographic equipment in changing rooms is **strictly prohibited**, even by their owners.
- If there are no changing rooms or they will be occupied, the coaches in charge must know in advance.
- Parents, representatives or relatives will not enter changing rooms, toilets and showers while minors are using them, unless strictly necessary; in that case, only one person of the same sex as the users may do so, informing the person in charge.
- Adults, coaches or volunteers, especially those of the opposite sex to the users, will not enter or remain in the changing room while users are undressed, except in cases of extreme necessity.
- Minors' autonomy will be encouraged, while guaranteeing supervision for ages 0 to 6 and for people with disabilities who need support to change, shower or use the toilet.
- Minors must remember that, under their code of conduct, they will ask an adult for help if they suffer or witness abuse, harassment or sexual violence; if this happens in the changing room, they must leave it and ask for help.
- If bullying in the changing rooms is suspected, the presence of the Protection Officer or other adults may be temporarily justified as a one-off measure, with supervision always carried out by at least two adults.

ANNEX V

Procedure for the Violence-Free Use of Rooms and Offices

Protection is not limited to training areas and changing rooms, but extends to other spaces used by players, such as physiotherapy rooms, offices, gyms or storerooms, where situations of violence may also occur.

People who use rooms and offices, especially when minors may be present, must know the procedures, protocols and guides published by the Club or the Federation on this subject, the safety principles applicable to these spaces, and ensure regulatory compliance in activities involving minors.

The Club undertakes to train its coaches, team managers and collaborators through an annual training and awareness plan, to define appropriate and inappropriate behaviour in the use of rooms and offices and to inform everyone at the Club, volunteers, players and families of these guidelines.

The following are mandatory rules:

- Do not lock offices, rooms or other spaces while they are in use and several people may be present, especially if one of them is a minor.
- As far as possible, a minor should never be alone with an adult in a space that is not public or visible (offices, storerooms, physiotherapy rooms, etc.).
- Display clearly, visibly and accessibly in common areas information on situations, attitudes and behaviours related to sexual violence, as an awareness-raising measure.
- Keep the Protection Officer's contact details available at all times on the Club's website.
- Make spaces accessible to people with disabilities, as far as possible.
- Specialists (doctors, physiotherapists, etc.) will behave in accordance with their professional code of ethics and will sign the code of conduct before starting their activity at the Club.
- The exit of each space will be properly signposted.
- Taking photos or recording videos of other people without their consent is not permitted, and is strictly prohibited in changing rooms and showers.

Specifically, in the physiotherapy room:

- A record of room occupancy will be kept, with the names of the professional and the patient.
- As far as possible, the walls will have some kind of glazing that provides privacy while allowing some visibility.
- The room will not be locked during use, especially while a minor is being treated.
- Families may ask to be present in the room while their children are being treated.
- The use of mobile phones, cameras or photographic equipment is strictly prohibited.
- To treat minors, professionals will have the informed consent of their families or guardians, whom they will keep informed of the treatment.
- Professionals who notice signs of injuries or possible assaults on the minors they treat will immediately inform the Protection Officer.

And in the gym or weights room:

- It is advisable for it to have some kind of glazing that allows some visibility.
- It will not be locked while in use.
- Surveillance by security cameras is recommended, in compliance with data protection regulations.
- If a minor must be accompanied by a member of the medical or technical staff, the express authorisation of their guardians will be requested or the presence of at least one other adult will be guaranteed.

- Relatives may only enter occasionally and with due authorisation.

ANNEX VI

Procedure for Preventing Violence on Trips, Overnight Stays and Camps

The following actions aim to guarantee the protection of minors on trips, tournaments, camps and other activities involving overnight stays organised by the Club.

Planning at the start of the season

- a) Invite families to a meeting, in person or online, to explain the protection measures, introduce the Board of Directors, the coaches and the Protection Officer, and explain the codes of conduct.
- b) Use the meeting to explain how tournaments, trips and other activities are organised, and to collect parents' or guardians' consent for unaccompanied travel of minors (Annex VII).
- c) Hold a meeting on the same terms with the players.
- d) The Board of Directors will ensure that the families' consent forms have been signed and filed.
- e) On trips there will be at least one adult per group, of the same sex as the minors in the group; in mixed groups, there will be adults of both sexes.
- f) If medical staff or physiotherapists travel, they will treat minors in accordance with their professional code of ethics and must have read and signed the code of conduct.
- g) The Protection Officer or a person designated by him will travel with the group.
- h) Everyone travelling, adults and minors, will have signed the code of conduct, and adults will have provided the negative certificate from the Central Register of Sex Offenders.
- i) Players will know whom to turn to if something worries them and will have the means to do so.

Before the trip

- a) Draw up a programme with departure and return times, itinerary, accommodation and rules for communication with members of the trip.
- b) Hold a meeting with families and players to explain the programme.
- c) Designate a Club contact person whom families can consult with any questions before and during the trip.
- d) Inform families and players who will act as protection officer during the trip.
- e) Set and communicate the trip rules to the players.
- f) Avoid minors wearing shirts or caps with their names printed on them.
- g) Organise room allocation in advance according to age groups, except in exceptional situations, ensuring that no adult shares a room with a minor.
- h) Distribute the rooms of the responsible adults appropriately (for example, if players are staying on several floors, at least one adults' room on each floor).

During the trip

- a) On arrival, check that there is no access to alcohol, drugs or content unsuitable for minors in the rooms.
- b) Hold group meetings to review the programme and rules, and ensure that minors always carry an identification badge.
- c) On return, ask the players and the responsible adults whether there have been any incidents.

The coaches and those in charge of the trip will always have the following responsibilities:

- Guarantee the safety and well-being of the players, assessing transport and accommodation risks in advance.
- Arrive before the minors at departure points, so that they do not wait alone.
- Hold a group meeting before boarding the coach, train, plane, etc.
- Ensure that each player knows the name of the person responsible for protection during the trip.
- Medical staff will treat injuries and illnesses in accordance with their professional code of ethics, without being alone with minors.
- Minors will not stay alone at the hotel due to injury or illness while the competition is taking place; as far as possible, they will be cared for by two adults.
- If a player falls ill or is seriously injured and must stay until the end of a match or tournament, they will be accompanied where possible by two adults and the family will be informed immediately.
- During free time, leisure activities will be done in groups and no minor will stay alone at the accommodation.
- Keep phones switched on and be reachable throughout the trip. Each person in charge will have a list of families' names and phone numbers, and vice versa.
- Have a specific procedure in place in case a minor goes missing.
- If a report of violence is made during the trip, the protection officer will have the power to adopt immediate measures, such as ordering the return home of the person (board member, coach, player, etc.) allegedly responsible.

ANNEX VII

Consent Form for Unaccompanied Travel of Minors

With regard to the trip to take place on _____, for the purpose of _____, to _____,

I, _____, with ID no. _____, in my capacity as _____ (father / mother / legal guardian) of the minor _____, a player in the _____ age group of CRC Pozuelo, being of legal age, fully responsible for my actions and exercising parental authority with the tacit consent of the other holder, this being an act in accordance with social custom, give my consent for my child or the minor in my care to travel with the Club for the stated purpose.

Furthermore:

- I have been adequately informed about the activity, schedule, itinerary, accommodation and adults responsible for my child's safety.
- My child and I have received information about the protection officer to turn to in case of doubts or problems during the trip.
- I have been informed of the rules for communicating with my child while they are away (times and means).
- I have previously provided and updated the health data and treatments my child requires, and will immediately communicate any information necessary for their health.
- I understand that those in charge of the trip will take all measures within their power to prevent harm or accidents, without necessarily being liable for any loss, harm or accident to my child.
- I have read the codes of conduct and acknowledge that my child must behave responsibly.

Contact phone number during the trip: _____

Signed in _____, on _____

Signature of father, mother or guardian

ANNEX VIII

Procedure for Communication and the Use of Images and/or Voice on Social Media

Photographs and videos are very valuable tools for promoting rugby and informing about the Club's activities, but their capture and use must be regulated to maintain an environment free from violence, with special attention to minors.

This material is collected for different purposes, including: historical archive, publicity in the media and on social networks, performance analysis, training, sports discipline and private use. In all cases, the protection of minors must be guaranteed, as their lack of maturity means they may be harmed by the manipulation, intentional or not, of their image or voice.

The misuse of technology and social media can lead to risk situations such as: access to and dissemination of personal data; publication of photos or videos without consent; sending offensive or inappropriate material; encouraging the use of doping substances; cyberbullying; grooming; peer violence; approaches with the aim of committing sexual abuse; risks arising from relationships with adults outside their circle; or misinterpretations of communication with minors leading to disciplinary or criminal investigations.

Therefore, anyone wishing to record or use images or the voice of underage Club players must know the Club's procedures and guidelines on this subject, the principles for using the website and official channels and the security principles for devices, and will respect the following rules:

- Individual photo sessions with minors under 18 will not be permitted.
- Taking photos or recording videos in changing rooms, toilets or bedrooms will not be permitted under any circumstances, not even by the minors themselves.
- Images published on the website or social media will never include personal data that could help locate a minor (address, phone number, school, etc.).
- Minors will not be photographed in a degrading manner or in provocative poses, and everyone appearing in photographs will be clothed.
- Families, guardians or other spectators will not be permitted to publish photos or videos of minors without their guardians' authorisation.

The Club undertakes to train its coaches, team managers and collaborators, and in particular the person in charge of the website and social media; to apply the same security principles to any electronic device; to ensure that all Club publications in digital media comply with current legislation, especially regarding the rights of minors; and to inform everyone at the Club, volunteers, players and families of these guidelines.

The Club's online presence will be governed by the following guidelines:

- All social media accounts will be password-protected, and at least three members of the Board of Directors or the communications team will have access to each account.
- Each account will be supervised by a person designated by the Club, who will consult the Protection Officer on all matters relating to the protection of players.
- Any inappropriate post or one that poses a risk to players, coaches or the Club will be removed immediately, informing the person affected or their family.
- All posts will strictly comply with data protection regulations, avoiding any data or image that could help identify a minor.
- The person in charge of the website and social media will ensure that they have the informed consent of everyone appearing in posts (for minors under 18, signed by their families or guardians).
- Posts that idealise criminal behaviour or endanger the safety of players (for example, glorifying playing while injured or athletes sanctioned for doping) will not be permitted.

With regard to coaches, team managers and volunteers, the Club will require that they:

- Know and apply these recommendations.
- Do not use their personal social media accounts to publish Club information; official communication will be made from the official accounts.
- In WhatsApp groups with players under 18, always have the consent of their guardians and ensure that at least two adults take part.
- Do not communicate with players under 18 through private messages from personal accounts outside sporting activity; communication will take place through their parents or guardians or, if this is not possible, copying in two adults (the Protection Officer and another responsible adult).
- Refrain from «friending» or «following» players under 18 on social media from their personal accounts.
- Behave appropriately and respectfully online, bearing in mind that they may be followed by minors from the Club.

Finally, players must know and apply these recommendations and refrain from using mobile devices during training sessions and matches, both on the pitch and in the changing rooms, except in an emergency.

ANNEX IX

Procedure for Preventing Violence at Award Ceremonies

Award ceremonies are an important moment in which feelings of joy and frustration come together after the effort made. It is essential that they take place respectfully and safely, without causing discomfort, mistrust or humiliation, either for those receiving the awards or for those presenting them.

At tournaments and events organised by the Club, the following actions will be applied:

- Staff taking part in the ceremony (speaker, hosts, etc.) will have basic training for their role and will wear appropriate clothing that does not reproduce sexist stereotypes.
- The ceremony protocol will be planned and communicated in advance to all participants, including dress rules for players collecting awards.
- All material and installations (podium, flags, medals, trophies, etc.) will be safe, with special attention to those used with young children.
- Trophy design will avoid sexist markings or the symbolic representation of only one sex.
- The same award will be given per category and sex, without inequalities in size, shape, quantity or quality, and without additional gifts differentiated by sex.
- Authorities or representatives presenting the awards will refrain from kissing players, particularly minors; the same criterion (traditionally, a handshake) is recommended for boys and girls.
- Whenever possible, there will be gender parity among those presenting the awards.
- Inappropriate expressions or comments, particularly sexist comments or jokes of a sexual nature, will be avoided in announcements.
- Behaviour that uses women or their bodies as an offering will not be perpetuated.
- Any harassment or abuse of a player by the person presenting the awards will have disciplinary consequences if they are a member of the Club, and will be reported to the competent authorities and bodies in other cases.

ANNEX X

Catalogue of Compromising Situations in Sport

This first catalogue distinguishes four main categories of compromising situations:

1. General situations

- a. Asking questions about sexual life.
- b. Prying into private life.
- c. Exercising or seeking to exercise control over private life.
- d. Picking them up at work, school or the sports centre without justification.
- e. Engineering apparently chance or repeated encounters.
- f. Entering the changing room without permission.
- g. Staying in the changing room while they shower or change.
- h. Secretly watching in changing rooms, toilets or rest areas, or placing audio or image recording devices.
- i. Forcing, through words or actions, a lack of privacy in personal acts.
- j. Establishing dual personal relationships (coach with player or similar).
- k. Coaches, technical staff or other adults sharing changing rooms with underage players.
- l. Encouraging alcohol consumption.
- m. Adults and minors sharing a room or space with the door locked.
- n. Calling individual training or other sessions without authorisation.
- o. Inviting players or other minors to one's home.
- p. Making proposals, invitations or incitements of a sexual nature.

2. Situations arising from verbal communication

- a. Derogatory or sexist comments.
- b. Jokes, mockery or teasing that ridicule people because of their sex.
- c. Jokes, mockery or teasing that ridicule people because of their appearance or physical characteristics.
- d. Jokes, mockery or teasing that ridicule people because of the way they dress or groom themselves.
- e. Vulgar language or expressions of a sexual nature.
- f. Homophobic, lesbophobic or transphobic expressions, jokes or opinions, general or alluding to the sexual orientation of a player or other minor.
- g. Aggressive expressions that cause discomfort or a hostile environment.
- h. Aggressive expressions that cause fear or terror.
- i. Insults or disrespect with sexual connotations.
- j. Explanations, instructions or corrections that include disrespect, rude words or insults.
- k. Verbal intimidation through proposals of a sexual nature.

3. Situations arising from acts or gestures of a sexual nature

- a. Lascivious or persistent looks.

- b. Whistles or other sounds.
- c. Facial or body expressions.
- d. Displaying images or objects with sexual, violent, racist or offensive content.
- e. Watching erotic, pornographic, racist or offensive videos.
- f. Playing music with sexual, violent, racist or offensive lyrics.
- g. Inappropriate use of new technologies.
- h. Uncomfortable messages, for whatever reason, through instant messaging apps.
- i. Unwanted communication or following on social media.
- j. Emails with sexual, violent, racist or offensive content.
- k. Persistent missed calls.
- l. Sharing sexual, violent, racist or offensive content in WhatsApp, Telegram or other app groups.
- m. Taking or sharing photos in the changing room or other areas in poses or situations that are uncomfortable or offensive for those who may see them.

4. Situations arising from physical contact

- a. Excessive and inappropriate physical closeness: hugs, squeezes, kisses and others.
- b. Pinching or slapping.
- c. Non-consensual touching.
- d. Non-consensual sexual acts or attempts.
- e. Rape or attempted rape.

This catalogue is a first approach that will be updated at least at the start of each season or when a situation justifies it. It is in no way an exhaustive catalogue.

ANNEX XI

Form for Reporting a Violent Incident

Send this completed form to the CRC Pozuelo Protection Officer: **lopivi@crcpozuelorugby.com**. In urgent cases, call or send a WhatsApp message to **+34 666 985 864**.

Person making the report	
Full name	
ID no.	
Contact phone	
Email	

Details of the minor who has allegedly suffered violence	
Full name	
Age group / team	
Age	
Father, mother or legal representative	
Phone and/or email	
Licence type	☐ Player ☐ Coach ☐ Technical staff ☐ Referee ☐ Other

Details of the incident	
Date of the incident	
Place	
During a match?	☐ No ☐ Yes Recorded in the referee's report? ☐ No ☐ Yes
Reported to the authorities?	☐ No ☐ Yes Authority: _____
Type of violence	☐ Physical ☐ Psychological ☐ Insults ☐ Sexual ☐ Social media ☐ Image/data ☐ Other
Any injuries?	☐ No ☐ Yes Where? _____
Description of the incident, complaint or report	

If you need more space, you may continue on separate numbered sheets attached to this report.

Attached documents

Witnesses	
Full name	Contact details

Actions taken by the Club (to be completed by the Protection Officer)

In _____, on _____

Signature of the person reporting

Received and processed by (name, date and signature)