

Child Protection Policy

GUIDELINES, PRINCIPLES AND PROCEDURES FOR THE PROTECTION OF MINORS' RIGHTS ADOPTED BY PER ESEMPIO ONLUS

Introduction

This document represents the policy, principles and procedures governing the child protection and safeguarding measures adopted by Per Esempio Onlus' staff members in the performance of their professional duties. Per Esempio Onlus firmly believes in the importance of protecting and defending the rights of children, including the right to be protected from all forms of violence, abuse or exploitation, and to grow up developing their full potential, to be healthy and happy, in accordance with the UN Convention on the Rights of the Child and Adolescent and the Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse (Lanzarote Convention, 2007). Per Esempio Onlus is committed to guaranteeing the protection of the rights enshrined in the UN Convention on the Rights of the Child to minors who come into contact with volunteers, trainees, and external collaborators of the association. Through its work, Per Esempio Onlus aligns itself with the "EU Strategy for the Rights of the Child" and promotes actions aimed at supporting



minors' participation in political and democratic life, their socio-economic inclusion, their right to health and education, promoting equal opportunities, preventing violence and protecting children from violence, promoting a legal system that meets children's needs, supporting a safe and positive digital experience for every child, and supporting children in their global actions. Per Esempio Onlus takes the issue of child abuse prevention to heart. Our association is aware that violence and abuse is a serious problem, widespread globally, which deserves to be addressed proactively. The drafting of this document demonstrates our commitment to the protection of minors who participate in our organisation's initiatives and networks. We will give equal priority to keeping all children and young people safe regardless of their age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation.

Furthermore, we recognise that some children are additionally vulnerable because of the impact of discrimination, previous experiences, their level of dependency, communication needs or other issues. Extra safeguards may be needed to keep children who are additionally vulnerable safe from abuse. Per Esempio staff will need to understand the challenges they face, build trusting relationships, take appropriate action to help keep children safe, use a strength-based approach to empower parents and carers to take steps to keep their children safe.

Per Esempio commits to making decisions and taking action to protect the best interests of the child.



The document is divided into six sections, which include:

1. the definitions used in Per Esempio's policies and work,
2. principles and values to be respected and promoted by all employees,
3. selection and recruitment practices at Per Esempio Onlus,
4. principles of conduct and procedures for staff in contact/working with minors,
5. procedures for reporting concerns or suspicions of child abuse,
6. cooperation with other organisations, networks and external agencies.
7. Media & Communication
8. Information about the revision of the document

We make sure all adults and children are aware of, understand and can access our safeguarding policies.

1. DEFINITIONS

EU Member States and all public and private entities are obligated to protect children from all forms of violence. Every EU Member State must, therefore, undertake the appropriate legislative, administrative, social, and educational measures to effectively protect children. This obligation derives from international and European human rights legal documents, including particularly the UN Convention on the Rights of the Child in Articles 3 and 19 and the [Charter of Fundamental Rights of the European Union](#) in Article 24. The European Commission Communication 'An EU Agenda for the Rights of the child', adopted in 2011, aims to step up efforts to protect and promote child's rights and to ensure they are effective in practice. While implementing this EU agenda, EU legislation has evolved both to reflect the UN Convention's and the Charter's provisions and language on the rights of the child and to reiterate, as a primary consideration, the principle of the child's best interests.

For the purposes of this policy, the following definitions taken by the above-mentioned documents are used:

A. The best interest of the child

This concept has three parts: a right, a principle, and a rule that must be followed to assess the child's best interests in a particular situation. This applies to situations in both public and private spheres and should be determined on a case-by-case basis considering the child's personal context, situation, and needs. The idea of prioritising the child's well-being is adjustable and strives to guarantee the complete and efficient fulfilment of every right that the 1989 United Nations Convention on the Rights of the

Child (UNCRC) acknowledges. Moreover, it supports the comprehensive growth of the child. To fully ensure the best interests of a child, it is vital to adopt a rights-based approach that considers the child's well-being as a whole. This approach guarantees the child's physical, psychological, moral, and spiritual integrity, while also promoting their human dignity.

B. Minors

Any person under the age of eighteen.

C. Child protection

The prevention of and response to violence, exploitation and abuse of children in all contexts.

D. Participation of minors

Participation of minors means that anyone under 18 has the right, opportunity and support to express their views individually or in groups on topics that concern them. They should be heard and their opinions given appropriate consideration based on their age and maturity level. To allow authentic and valuable involvement, children and young people ought to receive all relevant facts, guidance and assistance. They should receive suitable support and appropriate information to encourage their self-esteem, taking into account their age and specific conditions.

E. Staff members

Refers to paid staff, volunteers, interns, external contributors and occasional collaborators.

F. Visitors

Official visitors may visit a project with the express permission of Per Esempio Onlus. Unofficial visitors might, for instance, be a parent or an acquaintance of

the Project Manager or a staff member without formal permission from the organisation.

Per Esempio ensures that children are protected from all forms of mistreatment and inappropriate behaviour. Child mistreatment refers to any abuse or neglect suffered by children. Child abuse comprises physical and emotional assaults, sexual exploitation, neglect, and commercial or other exploitation – whether delivered physically or through the use of computer technology – in the context of a relationship of responsibility, trust, or power that results in actual or potential harm to the survival, development, or dignity of minors. Specifically, Per Esempio defines (by way of examples, not exhaustively) child mistreatment as follows:

A. Physical abuse of minors

Physical abuse is any intentional harm inflicted on a minor by anyone, including adults. Examples of physical abuse include broken bones, burns, severe or frequent bruising, and any other physical harm inflicted intentionally.

B. Emotional abuse of minors

Emotional abuse occurs when a child is repeatedly made to feel worthless, unloved, lonely or frightened. Examples of emotional abuse towards a child include: repeatedly ignoring or rejecting them; isolating them physically or socially; making them do things that frighten them; constantly criticising, humiliating or blaming them; swearing, shouting or screaming at them continually; bullying, teasing, insulting or belittling them; expecting them to do unrealistic or unreasonable tasks; not allowing them to explore, express

themselves, learn or make friends; treating a child poorly based on things they cannot change. (i.e. gender, sexuality, disability, etc.).

C. Child sexual abuse

This is the involvement of a child in sexual activities that violate laws and social norms, or sexual activities that the child does not fully understand, is unable to give informed consent to, or is not sufficiently prepared and developed to engage in. Child sexual abuse occurs when a child engages in sexual activity with an adult or another child who holds a certain level of responsibility, trust, or power due to their age or development.

D. Child pornography

Any image or video depicting a child's sexual organs or their participation in sexual activities (real or simulated) intended for sexual purposes.

E. Grooming

Grooming happens when someone builds a strong connection with a child to gain their trust, for the purpose of abuse, sexual exploitation, or trafficking. A child can be groomed online or in person, either by a stranger or by someone they know, such as a family member, friend or an adult professional.

F. Bullying

Bullying is when school-aged children are aggressive and engage in unwanted behaviour that demonstrates a perceived or real power imbalance. This behaviour is ongoing or has the potential to continue in the future.

G. Abandonment or negligent treatment

Negligent behaviour refers to the failure of those responsible for the care of minors to meet their physical and psychological needs, protect them from

danger, and provide them with medical care, birth registration, or other necessary services. This failure occurs despite having the means, knowledge and access to services required to fulfil these responsibilities.

H. Exploitation of minors

The exploitation of minors includes child domestic labour, child soldiers, the recruitment and involvement of children in armed conflict, sexual exploitation and pornography, the use of children in criminal activities, including the sale and distribution of drugs, and the use of children in hazardous or dangerous work.

2. PRINCIPLES AND VALUES

Per Esempio and its employees are committed to the following values and principles:

- A. Per Esempio recognises the value of each individual and does not tolerate any form of discrimination, in particular on the basis of age, skin colour, ethnic or social origin, gender, genetic features, language, religion or belief, political or any other opinion, membership of a national minority, gender identity or sexual orientation, property, birth or disability.
- B. Per Esempio has a zero-tolerance policy towards any form of inappropriate behaviour, violence or abuse towards minors.
- C. Per Esempio recognises the right of every child to be protected from all forms of violence or abuse as a result of inappropriate behaviour as defined in Section 1 of this document. The organisation is committed to preventing the perpetration of such violence against children and to reporting any abuse.
- D. The primary aim of the organisation's activities is the best interests of children and minors.
- E. Per Esempio supports the right of children to be heard and to express their views on matters that affect them and promotes this approach in its activities.

Per Esempio is committed to providing all necessary support to staff who work closely with children and minors.

3. SELECTION AND RECRUITMENT OF STAFF

Per Esempio has established and developed specific procedures for the recruitment and selection of staff, which include, in order, the filling in of applications, careful checking of references, criminal record checks, tax and social security checks and the creation of personal files on staff. In addition, the organisation's Code of Conduct makes explicit reference to measures to protect the rights of minors.

Applications for employment

- A. All potential employees are required to complete an application form and answer a series of questions about their educational background and previous work and volunteer experience.
- B. Applications for employment include a statement informing applicants of the organisation's zero-tolerance policy towards inappropriate, violent or child-abusive behaviour by staff.
- C. All employees who work or may work with minors will be asked to present a criminal record certificate in accordance with the Decree of the President of the Republic of 14 November 2002, no. 313 – art. 25 bis.

Checking references

Per Esempio reserves the right to use the following procedures to check references provided by prospective members:

- A. Contacting references provided by prospective members, including their family members;
- B. Contacting previous employers and companies to explore the possibility of re-employing candidates and to enquire about their ability to work with children;
- C. Checking the content of references by contacting the referees by telephone or other means;
- D. Carrying out online research on candidates and identifying any indications that they may be unsuitable to work with children (Google searches, national databases on sexual offenders, social networking sites) on sexual offenders, social networking sites).

Job interviews

- A. Candidates should be interviewed by at least two staff members. For this reason, we suggest the use of mock interviews or practice tests; it is important that candidates are assessed by several staff members.
- B. All interviews must be recorded by means of a special form that attests the consequentiality of the questions asked. The job interview evaluation forms created by Per Esempio will be used for this purpose.

4. PRINCIPLES OF CONDUCT AND PROCEDURES OF PERSONNEL IN CONTACT/WORK WITH MINORS

The following code of conduct must be followed when in contact with or working with minors:

Compliance with the Per Esempio Code of Conduct and Child Protection Policy

- A. Employees are required to sign a copy of the Code of Conduct adopted by the organisation before commencing their duties.
- B. Employees will be informed when changes or updates are made.
- C. The Code of Conduct is included in each employee's personal file and attached to the employment contract.
- D. External collaborators of Per Esempio who work with minors must sign a copy of the Code of Conduct, which includes this document.

Data protection mechanisms

The Code of Conduct outlines the procedures to be followed when collecting and processing children's personal data. These procedures comply with key European legislation (in particular the European Data Protection Regulation, EU 2016/679). The following rules apply to the collection of data from children:

- A. Informed Written Consent: Written consent from parents or guardians is required when it is necessary to collect personal information from minors. Data will be collected and used only for the specific purposes for which it was provided. Per Esempio employees responsible for collecting personal data from children can rely on Per Esempio's privacy policy and the European Data Protection Regulation (EU) 2016/679. Per Esempio will not share the information provided with other parties.
- B. Declaration of confidentiality: this must be signed by the staff who will handle the personal data of the people involved in Per Esempio's research activities. These declarations are specific to each project.
- C. The disclosure of information identifying minors who have come into contact with Per Esempio staff is subject to strict international, European and national regulations. They must therefore obtain the written consent of the parents or guardians of the persons concerned. The principle to be followed in all cases is that of the best interests of the child, as set out in Article 6 of the UN Convention on the Rights of the Child. This principle also applies to the dissemination, through printed or digital publications, of information or images relating to minors with whom the organisation has come into contact. In particular, the collection of data or images of minors may only be authorised if it is planned and/or strictly necessary for the implementation of the organisation's activities or projects. This information may only be used for the purposes for which it was provided and for a period

limited to the duration of the project. It is the responsibility of the organisation's staff to obtain the permission of the parents or guardians of minors, as well as the consent of the minors themselves, in accordance with current legislation. The images and data collected will be stored on Per Example's internal servers accessible only to staff members with the appropriate credentials who have already signed the Code of Conduct. The data stored on the internal servers is password protected and safe from external attacks.

- D. Publications: All publications produced by Per Esempio must comply with the guidelines for the protection and enforcement of children's rights.

Child Protection Training Rules and expectations are communicated to each new staff member and regularly reinforced with existing staff. This is done by training new staff on children's rights and the Code of Conduct. For instance, Per Esempio has adopted the "[Understanding Child Safeguarding](#)" guide, developed by Keeping Children Safe in collaboration with renowned organisations such as Save the Children and Terre des Hommes. In particular:

- A. All staff, volunteers, interns and at least those who work closely with children are required to attend training sessions on child protection. These training sessions will focus on the following topics: legislation on children's rights (UN Convention, Lanzarote Convention, national legislation), techniques for effective communication with children, measures for the prevention,

detection, documentation and reporting of sexual abuse against children. These training seminars will be based on existing teaching materials and will be developed from the programmes already developed by Per Esempio.

- B. External collaborators of Per Esempio, who may come into contact with children in the course of their work, must also participate in these training activities.

Regular work in contact with minors To ensure the well-being of children, and to make sure that we will identify minors' needs:

- A. Safe Environment: Establish a safe environment by maintaining appropriate staff-to-child ratios, providing necessary equipment and resources, and ensuring the physical space is secure and free from hazards.
- B. Transparency and Openness: Foster a culture of transparency and openness by encouraging staff and volunteers to report any safeguarding concerns without fear of retribution. We will ensure that all concerns are taken seriously, investigated promptly, and thoroughly to maintain trust and confidence.
- C. Involvement from the Start: Minors are included in the planning and decision-making process from the beginning, ensuring their voices are heard and their needs are met.
- D. Empowerment: Staff empower minors to take an active role in the activities, encouraging them to express their opinions and make decisions.

- E. Respect and Trust: Staff maintain a respectful and trustworthy relationship with minors, creating a safe and supportive environment for them to participate.
- F. Open Communication: Regular communication is maintained with minors, ensuring they are informed about the activities and their role in them. Feedback is sought from minors throughout the activities, allowing staff to adjust and improve the experience based on their input.

5. REPORTING OF SUSPECT CASES

- A. All Per Esempio staff members and volunteers can feel comfortable reporting safeguarding concerns without fear of retaliation. All concerns reported will be taken seriously and will be investigated promptly and thoroughly by the Child Protection Officer in collaboration with the Board.
- B. All Per Esempio staff must report suspected cases of child abuse by email to the appointed Child protection Officer, Giuseppe Candolfo: youth@peresempionlus.org. Employees must report any discrepancies between the organisation's procedures and the behaviour of employees. They must also attend training sessions on the procedures to follow if they suspect or become aware of child abuse.
- C. Minors can report cases by phone or email to the appointed Child protection Officer, Giuseppe Candolfo: +39 3803715946 / youth@peresempionlus.org.
- D. Decisions about child protection incidents must not be made by individual workers in isolation. However in exceptional circumstances – such as a life threatening situation – staff or volunteers may take whatever action they deem necessary to protect a child at immediate risk, but this must be reported as soon as possible in accordance with the Per Esempio's reporting framework.
- E. Reports of possible violations of the Code of Conduct, and in particular the Child Protection Policy, must follow the standard procedure, which includes the completion of a report form.
- F. Any employee suspected of violating the Code of Conduct for the Protection of Minors will be subject to an internal investigation. Per Esempio reserves

the right to take disciplinary action against the staff member concerned, up to and including the possible termination of the employment relationship. Any such investigation will be the subject of a referral to the relevant authorities (as the case may be).

- G. In the case of serious violations, the following external contacts should be considered for possible reports: State Police, Carabinieri, USSM (Ufficio Servizi Sociali Minori), Telefono Azzurro (1.96.96).

6. RELATIONS WITH EXTERNAL ORGANISATIONS, NETWORKS AND/OR AGENCIES

In the event of contact with external bodies such as organisations, networks and/or agencies, Per Esempio will proceed as follows:

- A. For any new cooperation with external organisations, networks and/or agencies, the approach of the other organisations to child protection is one of the criteria for the choice of partners.
- B. Per Esempio reserves the right to research child protection plans and initiatives promoted by partner organisations.
- C. Per Esempio has no tolerance for the distribution of content that is unsuitable for minors.
- D. The online form filled in by organisations wishing to become partners of Per Esempio contains an explicit reference to Per Esempio's policies and procedures for the protection of children's rights, as well as its zero-tolerance policy towards child abuse.
- E. Per Esempio reserves the right to take action against partner organisations whose members have been found guilty of child abuse during the implementation of its projects and programmes.

7. MEDIA AND COMMUNICATION

This section considers the actions that need to be taken to ensure that safeguarding is included in media activities. The Communication Department should be consulted for specific guidance including how to work with journalists and the media.

We will ensure the safety of children and young people by:

- A. Consent: Always seeking written consent from children and their parents or carers before taking and using their images.
- B. Transparency: Clearly explaining how images will be used, stored, and what potential risks are associated with sharing images of children.
- C. Withdrawal: Informing children and their families that if consent is withdrawn, it may not be possible to delete images already shared or published.
- D. Anonymity: Changing names of children in published materials whenever possible and only using first names if necessary, while ensuring personal information is not published.
- E. Disguise: Disguising identifying information, such as school names or logos, to protect children's privacy.
- F. Storage and Access: Ensuring children, their parents, and carers understand how images will be securely stored and for how long, including access controls.
- G. Risk Reduction:

- Clothing: Only using images of children in appropriate clothing, including safety wear if necessary.
- Body Shots: Avoiding full face and body shots of children in activities with heightened risk of misuse, such as swimming.
- Positive Reflection: Using images that positively reflect young people's involvement in activities.

For Visitors in events, we will raise awareness of the following items:

- Respectful Sharing:** Request that individuals refrain from sharing photos taken during the event on social media or obtain permission from children, their parents, and carers before sharing images that include them.
- Privacy Settings:** Suggest that individuals review the privacy settings of their social media accounts to understand who else may be able to view any images they share.
- Concerns and Support:** Remind children, parents, and carers that they can approach designated individuals if they have any concerns about images being shared.

8. REVISION OF THE DOCUMENT

This Policy will be regularly reviewed and updated to incorporate new information, best practices, and emerging trends, ensuring that our commitment to safeguarding children and young people remains current and effective.

The document has been finalised by relevant staff of the organisation, including:

Claudio Arestivo (President), Ernesto Paci (Vice-President), Anna Di Paola (Director), Anna Raspanti (Accountant Manager), Luigi Capizzi (Accountant Manager), Anna Bellan (Senior Project Manager), Giulia Baruzzo (Senior Project Manager), Giuseppe Candolfo (Coordinator of Bolton project with minors), Alberta Buffa (Project Manager).

The Child Protection policy has been developed and consulted with children, because they know best what works and what doesn't work for them. Per Esempio will continue to involve them in the revision of the document.

Approved by: Assembly of Per Esempio's Members

Date: June 2024

Review interval: 1 year

Next review due: June 2025

Employee lead: Emanuela Firetto, Child Protection Officer

Contact details

Nominated Child Protection Officer

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9. Appendices

Appendix 1: Code of Conduct

Appendix 2: Parental Consent Form

Appendix 3 : Safer Recruitment Checklist

