

CDEC Child Protection Policy

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1. Introduction

Fondazione Centro di Documentazione Ebraica Contemporanea (CDEC) strongly condemns all forms of violence against children and affirms that no violence against children is justifiable under any circumstances.

Many CDEC activities, projects, and programs involve school-age children under the age of eighteen. Therefore, CDEC is committed to doing everything necessary to prevent any adverse effects on children by taking seriously any reports, complaints or concerns having to do with violence against children and conducting rigorous investigations of abuse.

This Policy is designed to:

- a. strengthens the organization's ability to prevent and respond with concrete actions to issues related to child protection.
- b. increase awareness and knowledge of child protection among staff members, associated personnel, and the communities in which CDEC operates.
- c. provides guidance to all staff members, volunteers, partners, and associates of CDEC, as well as all children, families, and carers participating in all our activities.

1.1. CDEC core child protection principles and values

Fondazione CDEC is dedicated to the fight against all forms of racism and antisemitism, firmly defending civil rights. Our mission is deeply rooted in the promotion and protection of fundamental human rights, which extend to the most vulnerable members of our society: children.

In our quest to tackle hate and discrimination, we recognize the critical importance of safeguarding children from abuse, exploitation, and neglect.

This commitment is reflected in our comprehensive **Child Protection Policy (CPP)**, designed to ensure a safe and nurturing environment for all children involved in our educational programs, projects, and activities.

By integrating child protection into our broader mission, we emphasize that advocating for civil rights begins with ensuring the rights and well-being of every child.

CDEC Foundation's policy is based on:

- a. the **International Convention on the Rights of the Child (UNCRC)**, its four founding principles-non-discrimination (art. 2), best interests of the child (art. 3), right to life, survival and development (art. 6), participation (art.12) - and on the optional protocols to the Convention. The UNCRC must be taken holistically, providing a comprehensive framework for the protection, provision and participation of all children.

- b. The **European Commission**¹ guidelines principles and the **KCS standards**².
- c. Article 3(3) of the **Treaty on European Union** establishes the objective for the EU to promote the protection of the rights of the child.
- d. The **Charter of Fundamental Rights of the EU** guarantees the protection of the rights of the child by the EU institutions and by EU countries when they implement EU law. Article 24 on the rights of the child and Article 31 on the prohibition of child labour specifically cover children's rights.

The **principles** that govern this policy are listed below:

- Every action must be in the **best interests of the child**.
- **Zero tolerance for child abuse** and mandatory reporting of child abuse incidents or suspicions of child abuse.
- Children's protection constitutes a common responsibility for Fondazione CDEC, all its members, volunteers, trainees, partners and the communities in which it operates.
- All children involved in CDEC activities, projects, and programs have the right to have their health, safety, and well-being, and their best interests must be considered as a top priority.
- All children, regardless of their sex, race, colour, ethnic or social origin, genetic features, language, religion or belief, political or any other opinion, membership of a national minority, property, birth, disability, age, or sexual orientation or gender identity have access to and benefits services provided on an equal basis.
- CDEC recognizes and supports families' role as primary caregivers.
- **Implementation and accountability**

This Child Protection Policy is developed to ensure the highest standards of professional behaviour and personal practice to ensure no harm occurs in any situation to children and adolescents during their involvement in CDEC activities, projects, and programs.

It therefore includes measures regarding recruitment procedures, review of management structures, creation of space for children to speak out, staff training, and development of transparent protocols. The included standards are a tool servicing the promotion of the welfare of children in CDEC activities, projects, and programs.

The CDEC Child Protection Policy is supported by clear guidelines on how it needs to be implemented by organisations participating in and supporting children in CDEC activities, projects, and programs. Special procedures and checklists are part of the CDEC Child Protection Policy, including reporting procedures and actions following behaviour, which is not in compliance with the child protection standards.

- **Children participation**

1) For more, visit https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/rights-child_en.

2 () See also "The Internal Child Safeguarding Standards" by KCS, available at <https://www.keepingchildrensafe.global/wp-content/uploads/2023/09/KCS-CS-Standards-ENG-200218.pdf>.

CDEC aims to create spaces where children feel able and willing to speak about abuse, free from abusers, and which empowers them to become actors in their own protection without further discrimination or shame. CDEC aims to empower children by making them aware of their rights and creating a safe environment where they can exercise their rights.

- **Open environment:**

CDEC believes in creating an environment where issues of child protection are discussed openly and are understood between children and adults and ensuring a framework to deal openly, consistently, and fairly with allegations concerning both direct and indirect abuse.

1.2. Definitions

1. **Child:** CDEC uses the definition of the UN Convention for the Rights of the Child, by which any person under 18 years of age is a child, even if a country's laws recognize an earlier coming of age.
2. **Child's best interests:** the principle of the best interests of the child is one of the four general guiding principles on children's rights (right to non-discrimination, best interests, right to life, survival and development, right to participation or right to express opinions that are considered). It is closely related to Article 3(1) of the Convention on the Rights of the Child (CRC) and Article 24(1) of the Charter of Fundamental Rights of the European Union.
3. **Child protection:** the term is used to describe the responsibility, actions and prevention strategies that CDEC adopts in targeting and reporting any child abuse and/or neglect.
4. **Staff/Personnel:** the term refers to all personnel working at CDEC.
5. **Partners:** the term refers to all partners, members of the Board of Directors (BoD), volunteers, researchers, or trainees who are associated with CDEC.
6. **Working with children:** the term refers to an employment position that includes frequent contact with children, either as part of the employee's responsibilities or because of the job description that brings the employee frequent contact with children.

According to International standards³, **child abuse** constitutes all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power.

Harm cannot always be easily categorized, as children can be abused in several ways. They may be abused in a family, an institution, a community, a faith setting, or via social media/internet. They may be harmed by an adult or adults or another child or children.

Here are some **broad definitions** of abuse can be identifying:

- a) **Physical abuse:** actual or potential physical harm perpetrated by another person, adult, or child. it may involve hitting, shaking, poisoning, drowning and burning. Physical harm may also be

3 () See "WHO Definition, Report of the Consultation on Child Abuse Prevention, 1999", "Child Protection fact sheet, The definitions and signs of child abuse, NSPCC, 2009", "The UN Secretary General's Study on Violence, 2005".

caused when a parent or carer fabricates the symptoms of or deliberately induces illness in a child.

- b) **Sexual abuse:** forcing or enticing a child to take part in sexual activities that he or she does not fully understand and has little choice in consenting to. This may include but is not limited to, rape, oral sex, penetration, or non-penetrative acts such as masturbation, kissing, rubbing, and touching. It may also include involving children in looking at, or producing sexual images, watching sexual activities and encouraging children to behave in sexually inappropriate ways.
- c) **Child sexual exploitation:** a form of sexual abuse that involves children being engaged in any sexual activity in exchange for money, gifts, food, accommodation, affection, status, or anything else that they or their family needs. It usually involves a child being manipulated or coerced, which may involve befriending children, gaining their trust, and subjecting them to drugs and alcohol. The abusive relationship between victim and perpetrator involves an imbalance of power where the victim's options are limited. It is a form of abuse that can be misunderstood by children and adults as consensual. Child sexual exploitation manifests in several ways. It can involve an older perpetrator exercising financial, emotional or physical control over a young person. It can involve peers manipulating or forcing victims into sexual activity, sometimes within gangs and in gang-affected neighbourhoods. It may also involve opportunistic or organised networks of perpetrators who profit financially from trafficking young victims between various locations to engage in sexual activity with multiple men.
- d) **Neglect and negligent treatment:** allowing for context, resources and circumstances, neglect and negligent treatment refers to a persistent failure to meet a child's basic physical and/or psychological needs, which is likely to result in serious impairment of a child's healthy physical, spiritual, moral and mental development. It includes the failure to properly supervise and protect children from harm and provide for nutrition, shelter and safe living/working conditions. It may also involve maternal neglect during pregnancy as a result of drug or alcohol misuse and the neglect and ill-treatment of a disabled child.
- e) **Emotional abuse:** persistent emotional maltreatment that impacts a child's emotional development. Emotionally abusive acts include restriction of movement, degrading, humiliating, bullying (including cyberbullying), and threatening, scaring, discriminating, ridiculing or other non-physical forms of hostile or rejecting treatment.
- f) **Bullying:** may be fined as deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves. It can take many forms, but the three main types are physical (e.g., hitting, kicking, theft), verbal (e.g., racist or homophobic remarks, threats, name-calling), and emotional (e.g., isolating an individual from the activities and social acceptance of their peer group).
- g) **Commercial exploitation:** exploiting a child in work or other activities for the benefit of others and to the detriment of the child's physical or mental health, education, moral or social-emotional development. It includes but is not limited to, child labour.
- h) **Child pornography:** any representation, by whatever means, of a child engaged in real or simulated explicit sexual activities or any representation of the sexual parts of a child for primarily sexual purposes. This can include photographs, negatives, slides, magazines, books, drawings, movies, videotapes and computer disks or files. There are two categories of pornography: soft-core which is not sexually explicit but involves naked and seductive images

of children and hard-core core which relates to images of children engaged in sexual activity and use of children in the production of pornography is sexual exploitation.

1.3. Legislation

This policy conforms to the principles and values which inspire the International Charters and National Laws – in particular:

1. Convention on the Rights of Children (1989) and Law of 27 May 1991 n.176 (Ratification and execution of the Convention on the Rights of the Child) its implementation Government report to the UN on the application of the CRC.
2. Convention on the Rights of the Child (Italy 10th CRC Update report on monitoring of the Convention on the Rights of Children and Adolescents, 20 November 2019).
3. Constitutional Charter of the Italian Republic (art. 3).
4. European Union Convention on Fundamental Rights (2000, art.24).
5. European Convention on the Exercise of Children's Rights (Strasbourg 25/1/1996), Ratification Law no. 77 of 20 March 2003.
6. Regulation of National Child Protection Bodies: National Centre for Documentation and Analysis of Childhood and Adolescence Conditions (CNDA) (Law 451/1997 and Presidential Decree 103/2007).
7. Parliamentary Commission for Childhood and Adolescence (Law 451/1997, amended by Law 112/2009) monitoring implementation of international agreements and legislation on the rights and development of subjects in developmental age.
8. National Observatory for Childhood and Adolescence (Law 451/1997; Presidential Decree 103/2007) for the National Plan of Action and Interventions for the Protection of Rights and Development of Subjects in Developmental Age (National Childhood Plan).
9. United Nations General Assembly (2006), UN Report on Violence against Children.
10. UN Committee (2013) general comment n. 14 on the right of minors to what one's best interests are taken into primary consideration and n. 15 on the law of minors to enjoy the highest possible standard of health.

2. Subjects

2.1. Purpose and Responsibility

CDEC will ensure that all its Staff/Personnel, members and volunteers are informed about this Policy, act following all its provisions, and do no harm to children who may come into contact within or outside their work.

For **effective implementation** of the Child Protection Policy, it needs to be understood accurately by all those to whom the policy applies.

The CPP must apply to:

- a) all staff, management board members, interns, and volunteers of CDEC.
- b) all those acting on behalf of CDEC, such as members, consultants, and trainers.
- c) all adults accompanying children to events and activities organized by CDEC.
- d) all participating in CDEC events and meetings involving children, including journalists, sponsors, donors, policymakers, etc.

When working through partners, they have a responsibility to ensure the protection of children in their programs. Any external partner who cooperates with us in events, activities, and programs involving children will be asked to provide evidence of their own child protection policy or to sign up for CDEC CPP.

To ensure the implementation of the Child Protection Policy (CPP) every employee, volunteer, or associate will be **informed about the CPP and any other procedure** concerning direct and indirect work with children.

Every employee, volunteer, or associate is obligated to cooperate with law enforcement and social welfare institutions in order to ensure the well-being and best interests of the child.

The principles outlined in this Policy must be observed at all times, both during working hours and in private life, without exception.

The policy is also available in Italian and English on the CDEC Website.

2.2. Risk Assessments

Risk mitigation strategies will be developed, which minimize the risks to children and will be incorporated into the design, delivery, and evaluation programs and activities that involve and impact children.

It is important for all Staff/Personnel, members, and volunteers in contact with children to be aware of situations that may present risks.

So that the above standards of reporting and responding are met, members and others will also ensure that they:

- a) Take any concerns raised seriously. It is especially important to ensure that children are aware of their right to be heard (as per Article 12 UNCRC).
- b) Take positive steps to **ensure the protection** of children who are the subject of any concerns.
- c) **Support** children, staff, or other adults who raise concerns or who are the subject of concerns.
- d) Act appropriately and effectively in instigating or co-operating with any subsequent process of investigation.
- e) Are guided through the child protection process by the **principle of the best interests of the child**.

- f) Listen to and take the views and seriously wishes of children.
- g) Work in partnership with parents/carers and/or other professionals to ensure the protection of children.

2.3. Child-safe Programs Design

CDEC is committed to designing and delivering programs, activities, and projects that are safe for children, minimize risks, and prevent abusive behaviours.

Therefore, all Staff/Personnel, members and volunteers must undertake that:

1. in the **planning of the projects** and **in all phases of conducting the research activities**, the dignity, freedom, rights, interests, needs, and psychophysical well-being of the minors involved are considered.
2. in interactions with minors, they are respected and listened to, especially in the expression of their desires and emotions.
3. as far as possible, they must be visible in working with children.
4. they must ensure that a **culture of openness exists** to enable any issues or concerns to be raised and discussed; and that a sense of **accountability** exists between the staff so that poor practice or potentially abusive behaviour does not go unchallenged.
5. in the activities conducted for the purposes of the project, **minors are protected** from possible **prejudice, discrimination, exploitation, or manipulation** through the necessary prevention actions.
6. the emergence of cases of suspected discrimination, prejudice, or damage to a minor, caused intentionally or through negligence or carelessness is facilitated.
7. the confidentiality of the person making the report, of the person to whom the accusation is addressed as well as that of the minor (or minors) involved is protected.
8. the **protection of confidentiality recedes** in the face of the duty to report cases of suspected crime to the competent authorities.
9. forms of **stigmatisation, discrimination, or retaliation** against the individuals to whom the accusation is made are actively prevented.
10. empower children – discuss with them their rights, what is acceptable and unacceptable, and what they can do if there is a problem.

Confidential information must only be shared on a **need-to-know basis**. Staff members, volunteers, parents, or carers are not allowed to give absolute guarantees of **confidentiality** to children or other colleagues wishing to tell them something serious. They must also undertake that:

- a. They are obligated to **clearly define situations** in which they need to breach confidentiality.
- b. They must, however, guarantee that they will only pass on information to the minimum number of people who must be told to ensure proper action is taken.
- c. They must guarantee that they will not tell anyone who does not have a clear “need to know” and that confidentiality will be respected within the designated team.

- d. If any Staff/Personnel, member and volunteer, parent, or carer has any suspicion, allegation, or disclosure that a child is suffering or is likely to suffer significant harm, then this must always be referred to the relevant Child Protection Representative or Social Services.

2.4. Training and education

Professionals, practitioners, and volunteers working for and with children in CDEC's educational programs will receive proper training and guidance on this policy, its values and principles, the code of conduct, the national laws, identification of risks, and reporting procedures.

CDEC will ensure that all Staff/Personnel, members and volunteers are well-informed and supported by the following process:

A) *Induction*

As part of their general induction, new members, personnel and volunteers will be informed of this Child Protection Policy document, as well as other policies such as Health and Safety. This will include **training in child protection issues**.

B) *Probationary Period*

The development and suitability of the employee or volunteer will be reviewed during the first six months of taking up the post.

C) *Supervision and Support*

Regular meetings, whether individual or on a group basis, will provide an opportunity for Staff/Personnel, members and volunteers to share concerns, anxieties, or worries about their work or the environment. Meetings should also be an opportunity to identify areas of concern and/or training needs.

D) *Specific training will be provided for all designated Child Protection Representatives.*

2.5. Recruitment Procedures

All Staff/Personnel, members, and volunteers, including temporary or casual workers, must be subject to CDEC's **selection and recruitment procedures** as follows:

- a) All candidates must complete an application form.
- b) The recruiting manager must verify the person's identity by his/her birth certificate, passport, or other formal document, preferably something bearing their photograph.
- c) The recruiting manager must verify any qualifications stated on the application form.
- d) All suitable candidates must have an interview or meeting, with the recruiting manager and one other senior staff member.
- e) Any gaps in employment or inconsistencies in the candidate's history must be identified and reasons given.

- f) Written references should be taken up before the employment of the successful candidate and verified by a telephone call.
- g) All successful candidates must be subject to a **check by the Criminal Records Bureau**.
- h) No unsupervised access to children is to be allowed until references have been reviewed.
- i) Advice should be sought before recruiting someone with a criminal record or record of other offenses.
- j) New members of staff or volunteers must undergo a supervised **probationary period** – including a comprehensive induction which must cover the Child Protection Policy and the procedures.

3. Code of ethics and conduct

Staff/Personnel are obliged:

- To respect the individual personalities of the children that are supported and protected by CDEC and ensure their best interests.
- not to violate the rights of children under the protection or the supervision of CDEC.
- when practicing their professional activities to preserve the children’s privacy and matters that concern them.
- to deal with children as equals and with respect regardless of their ethnicity, skin colour, sex, language, religion, origin, beliefs, the legal status of their own or their family members, and respect their national, religious, cultural and social background.
- to respect the human dignity of every child, their physical integrity, and the right of the child not to be treated in a demeaning manner and not to be violently raised. Any and every kind/form of violence towards the children is strictly prohibited.
- to inform immediately the relevant/appropriate people in charge regarding incidents of children being mistreated when it comes to their attention.
- to contribute to the proper preparation of children for their role in society as active and responsible adults through games, sports, participation in teams, assignment of responsibilities, etc.
- to provide and ensure high-quality medical care, equal opportunities, and access to all kinds of education and career guidance for the children.
- to take into consideration, according to the age and maturity of the children, their right to participate in the decision-making regarding their life and their living conditions.
- to respect the children’s private life and their freedom of expression, on the condition that the other children’s rights are not violated.
- to encourage children to speak up for matters that concern them.
- to provide, as much as possible, support and positive reinforcement measures to strengthen the relations and the functionality between each child and their family.

The violation of any of the above obligations constitutes a **disciplinary offense** and is presented to the BoD for evaluation, while the Board is also empowered to take measures of reprimand (oral or written), call for compliance and/or terminate the *employment contract without indemnification from the Organization*.

3.1. How to recognize signs of abuse

Awareness is the key issue in both the detection and prevention of abuse.

There are **potential warning signs** that you can be alert to, but they have to be assessed with care. It should not be automatically assumed that abuse is occurring. Equally, however, it is important not to dismiss your concerns or ignore any sign of abuse.

These should be discussed as soon as possible with the Child Protection Representative to help decide the most appropriate course of action.

A Staff member/personnel, volunteer, parent or carer may become aware or suspicious of abuse of a child by:

- i) being told in confidence by the individual child
- ii) being told by another person as hearsay or as a witness
- iii) observing symptomatic behaviour
- iv) observing outward signs of physical abuse/injury

The abuse may:

- a) took place a long time ago – even in early childhood and the child may still be suffering the consequences.
- b) be an ongoing form of abuse that takes place outside CDEC (e.g. typically at home).
- c) be a current or very recent abuse that has taken place within CDEC.

Indicators may include:

- **Physical Abuse:** any visible injuries particularly not normal child-like bumps and scrapes, sprains, dislocations, burns, cuts. Children who find it painful to walk, sit down, move their jaws, or demonstrate other pain. Being furtive or secretive, or displaying uncharacteristic aggression or withdrawn behaviour. Compulsive eating or sudden loss of appetite. Having difficulty in staying awake or suddenly becoming un-coordinated. Giving confused or conflicting explanations of injuries. Refusing to discuss injuries. Arms and legs kept covered in hot weather. Unwilling to participate in physical activities that may involve undressing (e.g. sports). Self-destructive tendencies. Being very passive and compliant. Chronic running away.
- **Emotional Abuse:** poor attachment relationship between the child and parent/carer. Parent/carer displaying unresponsive or neglectful behaviour towards the child or making negative comments about the child. The child may be demonstrating emotional indicators such as low self-esteem, unhappiness, fear, distress, or anxiety and demonstrating behavioural

indicators such as attention seeking, opposing, withdrawing or insecurity, or inappropriate emotional responses to situations.

- **Sexual Abuse indications:** awkwardness in walking or sitting down, tummy pains, tiredness, extreme variations in behaviour; such as anxiety, aggression or withdrawal, sexually provocative behaviour or knowledge that is incompatible with the child's age and understanding, drawings and/or written work which are sexually explicit, direct disclosure – it is important to recognize that children have neither the experience nor the understanding to be able to make up stories about sexual assault.
- **Neglect indications:** underweight or obese, unkempt dirty appearance; poor personal hygiene; inadequate/unwashed clothes (e.g. summer clothes in winter), untreated medical problems, drug or alcohol abuse; frequent hunger; listlessness; constant tiredness; indiscriminate friendliness or poor social relationships, poor concentration, low self-esteem.

Signs of concern regarding adult behaviour:

- A person in whose presence the behaviour of a child significantly changes such as becoming withdrawn, fearful, distressed, or agitated.
- Asking a child to lie or keep secrets.
- Breaches of the CDEC Code of Conduct/behaviour protocols.
- Initiating private contact with a child, or by e-mail or phone.

3.2. Appropriate conduct and behaviour

Staff members/personnel, volunteers, parents, and carers must:

- Be aware of a visually impaired child's need for physical contact but ensure that contact is appropriate and given only with the consents of the child – in the case of restraining a child to prevent injury or comforting a distressed child, ensure physical contact is ceased at the earliest possible moment.
- Avoid initiating physical expressions of emotion such as kissing or hugging but remember that a visually impaired child may need to physically express emotion in these ways – if a child initiates such expressions, cease it at the earliest possible moment without causing the child to feel rejected.
- Avoid intrusive forms of play (i.e., tickling, horseplay) – if a child offers physical contact, cease it at the earliest possible moment without causing the child to feel rejected.
- Do not allow children to use inappropriate language unchallenged.
- Ensure that at least two adults are present when supervising children during activities.

- Do not spend excessive amounts of time alone with children, away from others – meetings with individual children have to take place as openly as possible. If privacy is required, the door must be left open and other staff or volunteers have to be informed of the meeting.
- Avoid taking individual children on car journeys, however short – where this is unavoidable, it must be with the full knowledge and consent of parents/carers and a member of management.
- Not meet with children outside organized activities unless it is with the knowledge and consent of parents and a member of management.
- Never do things of a personal nature for a child that they can do themselves.
- Always address and document any allegations made by a child.

The following forms of behaviour between Staff/Personnel, members, volunteers and children are **not allowed under any circumstances**: sexual conduct, lending or borrowing of money or property, giving or receiving gifts, and exclusive or secretive relationships.

3.3. Procedures for safeguarding children on trips and visits

Trips involving children will normally also include parents and carers. However, the following procedures must be adhered to and keep children safe:

- A) Ensure children are aware of how they are expected to behave.
- B) Gain written consent from parents/carers for children to participate in an outing, as well as a written statement of any specific needs or requirements for their child.
- C) Ensure at least one staff member or volunteer participating in the outing is trained in first aid and has access to first aid equipment.
- D) Ensure all those attending are aware of their roles and responsibilities and are appropriately qualified and experienced.

If using an **activity centre**, or other external providers:

- E) Use reputable organizations that have in place any licenses or accreditation required (some adventure activities require specific licenses).
- F) Visit the centre beforehand wherever possible.
- G) Gain agreement from parents/carers and the children on the trip on the activities to be undertaken.
- H) Ensure external providers have proper safety procedures in place (e.g. insurance, equipment/transport maintenance, health and safety policy, Child Protection Policy, etc.).
- I) Ensure the accommodation is suitable.

J) All planned activities and trips must be appropriate for the group of children participating.

Security measures are already in place for visits to the CDEC. However, special attention must be given to ensuring the safety of minors, especially if additional visits are planned to external centres or providers:

- A. Any visit to a centre or a place where specific projects or programs are implemented, by individuals outside the CDEC staff, must be planned and organized in advance by the visitor in collaboration with the CDEC staff.
- B. If a visitor enters a centre without proper authorization from the staff, the CDEC or its partner may decide to deny access.
- C. Every visitor must be identified before entering a centre.
- D. It is strictly prohibited to invite children to leave the centre, even for a short time, or for visitors to give money to children or their families.
- E. During the visit, the sponsor and the child are not allowed to exchange addresses or personal information.
- F. Special attention must be given to those visitors who continue to visit children frequently, as well as to any ambiguous behaviour. See in detail Section “3.1. *How to recognize signs of abuse.*”

3.4. Information about data protection procedures

This section provides guidelines on the use of children’s information for communication purposes to ensure data protection and to protect children themselves. Abusers have sometimes targeted children whose pictures they have seen in media and communication material.

Therefore, it is strictly prohibited to take photos or videos of minors during activities. This restriction has been established to ensure the privacy and safety of the children, as well as to protect their rights.

Any violation of this rule will result in disciplinary action and potential legal consequences.

General principles:

- a. **The child’s dignity must be preserved at all times.** Languages must not degrade, victimize, or shame the child.
- b. **Any information that could be used to identify a child or put them at risk will not be used.**

Only use the first names of children: be careful not to reveal details about the place where they live, their school, and other information that would lead to their place of residence. The recorded images must focus only on the activity and materials.

Informed consent must be always sought before **requesting personal information about children’s lives** that may be used in CDEC materials.

Here is the complete information on the processing of personal data in English on the Fondazione CDEC Website available at <https://www.cdec.it/privacy-policy-2/>.

The information is available also in Italian.

4. Implementation strategy

4.1. Responding to suspected abuse

All cases of alleged or suspected abuse must be immediately reported to the designed Child Protection Representative, or, in his/her absence, to the Director.

CDEC has appointed Patrizia Baldi responsible for child protection. See *Appendix 2* for the specific training required.

Take note that:

- A. No Staff/Personnel, members and volunteers, parent, or carer should investigate reports of physical or sexual abuse him/herself.
- B. Alleged victims, perpetrators, those reporting abuse, and others involved must not be interviewed beyond the point at which it is clear that there is an allegation.
- C. **Medical attention** must be sought immediately for the child if required.

Any individual to whom an allegation of child abuse is made has then to:

Step 1: Limit any questioning to the minimum necessary to seek clarification only, strictly avoiding “leading” the child by making suggestions or asking questions that introduce their own ideas about what may have happened.

Step 2: After the child discloses that something abusive has happened to him/her or someone else, collect only necessary information (see *Appendix 1*) to ensure that there is a reasonable doubt and to be able to report to the Child Protection Representative. Stop asking any more questions as soon as the child has disclosed that he/she believes that something abusive has happened to him/her or someone else.

Step 3: Tell the child that the relevant designated Representative or Authority will now be made aware of the issue.

Step 4: Depending on the age of the child, ask the child what steps he/she would like taken to protect him/her now that an allegation has been made and assure him/her that CDEC will try to follow those wishes.

Step 5: Report the information immediately to the designated Child Protection Representative for that area (or to HR or the Director at Head Office). If the allegation or suspicion is about the designated person, the report should be made to Head Office. If the volunteer or member of staff would prefer to speak to someone other than designated persons within CDEC, he/she should contact Social Services directly.

Step 6: Complete a Record of Concern form and pass this to the designated Child Protection Representative, or relevant Authority if required. Records of Concern must be stored confidentially, in a secure place accessed only by a designated Child Protection Representative.

Step 7: If the report has been made to a staff member or volunteer, inform the child's parents/carers unless there is a suspicion of their involvement.

Additionally, any Staff/Personnel, member and volunteer, parent, or carer who is told indirectly of any incident or witnesses or suspects any form of child abuse must report the information immediately, as detailed in Step 5.

Focal Point Contacts:

Patrizia Baldi, Manager of Education Fondazione CDEC and Child Protection Representative

(E-mail: edu@cdec.it; tel. 02 316338)

Gadi Luzzatto Voghera, Director Fondazione CDEC

(Email: direzione@cdec.it; tel. 02316338)

Appropriate external contacts are:

- The respective local authorities and police stations.
- Emergency Numbers in Italy:
 - Ambulance (Pronto Soccorso Sanitario): 118
 - Carabinieri (Police): 112
 - Polizia (Police): 113
 - Vigili del Fuoco (Fire Department): 115
- The respective local social services offices.

4.2. Internal Safeguarding Procedures

Children must understand that their concerns will be listened to and taken seriously.

It is also essential that parents and carers are aware of and understand the procedures CDEC has in place for maintaining the welfare of children using its services.

CDEC Management is responsible for ensuring that **relevant information is available** to and exchanged between all those involved in the operation of CDEC and its activities. The material will be available both online and in paper form as leaflets, and child-friendly format.

Management and staff/personnel are responsible for:

- a) Ensuring children have information about how and with whom they can share their concerns, complaints, and anxieties. This information must be shared in a manner appropriate to the age of the child/young person. Therefore, a child-friendly format of the CPP will also be prepared and available in Italian – which will include local procedures and focal point contacts.

- b) Ensuring all information is available in multiple formats for the blind and visually impaired.
- c) Ensuring parents and carers are aware of the nature of relationships with adults with whom their children form friendships.
- d) Publicizing information to parents and carers about CDEC’s activities, its Child Protection Policy and procedures, and the name of the person(s) to contact in the event of concerns or complaints.
- e) Ensuring **all staff and volunteers have the information required to deal with emergencies** and child protection issues.
- f) Following carefully the **procedures** for **recruitment** and selection of staff and volunteers.
- g) When a vacancy is identified, a job description or task/project brief must be drawn up which should identify the skills required for that post. The vacancy should be advertised as widely as possible through the most appropriate means.
- h) Publicizing all the information related to the CPP on the website – both in Italian and English.

4.3. Accountability

The aim of monitoring and evaluating this policy is to learn from practical case experiences, which will contribute to informing CPP review.

Monitoring and evaluation will be done by checking whether the standards from the CPP are implemented and whether safeguards are working.

This will be done by surveying all Staff/Personnel, members, and volunteers on how the standards from the CPP are met, how effective they are, and what improvements are needed. Based on the results of the self-assessment, a specific **improvement plan** is then prepared.

In addition, reactive monitoring will take place after incidents have occurred, which will contribute to a learning process for CDEC and, if necessary, for this policy.

Every three years in January an internal review of the Child Protection Policy will be conducted, and its results will be approved by the BoD.

ANNEX 1:

RECORD OF CONCERN

All Records of concern must be stored in a secure location and accessed only by the Child Protection Representative.

Name of the Child:

Age:

Child's Address:

Name of Parent/Carer:

Telephone No.:

Is the person making this report expressing his/her own concerns or passing on those of someone else?

What is said to have happened or what was seen?

When and where did it occur?

Has the child been spoken to? If so, what was said?

Who else, if anyone, was involved and how?

What was said by those involved?

Were there any obvious signs, e.g. bruising, bleeding, changed behaviour?

Has anybody been alleged to be the abuser?

Have the child's parents been contacted?

Who else has been told about it and when?

For completion by the Child Protection Representative:

Incident/Accident investigated:

Yes ____

No ____

Written investigation reports necessary:

Yes ____

No ____

To determine the cause of the incident or accident, it may be appropriate to interview the parties who were involved. Witness details, statements, etc. can be added here:

Signed..... Date.....

NAME.....

ANNEX 2:

GUIDELINES FOR CHILD PROTECTION REPRESENTATIVES

The responsibilities of the designated **Child Protection Representative** are:

1. To ensure that CDEC Child Protection Policy and Procedures are followed.
2. To undertake training in the recognition and investigation of child abuse.
3. To develop knowledge of the procedures involved in reporting abuse.
4. To make this knowledge available to all staff, volunteers, parents, carers, and children as appropriate.
5. To manage the process of referring cases or suspected cases of abuse to Social Services by:
 - i. Ensuring all staff, volunteers, parents, carers, and children know who the designated Child Protection (CP) Representative is.
 - ii. Ensuring that all staff, volunteers, parents, carers, and children know that concerns about abuse or possible abuse must be brought to the designated CP Representative or in his/her absence, the most senior member of staff.
 - iii. Deciding, after discussion with the relevant parties, if the case should be referred or not, or if further clarification should be sought from the parents/carers at any point.
 - iv. Ensuring decisions and facts are recorded using a Record of Concern.
 - v. Reporting the case to Social Services, confirming the referral in writing under confidential cover.
6. To ensure all staff and volunteers undergo basic Child Protection awareness training as appropriate.
7. To be a contact point for external agencies needing to contact CDEC about child protection matters.
8. To ensure written records are stored securely with access available to designated people only.
9. To ensure CDEC recruitment procedures are followed, and a “statement of a clean criminal record” is obtained for all new staff.
10. Identify the need for support that any employee or volunteer may have when involved in an abuse case and consult with necessary parties to establish how this support can be offered.

Gadi Luzzatto Voghera
Director
FONDAZIONE CDEC
Milan, 10/08/2024