



ORGANISATION AND MANAGEMENT MODEL

Protocols

**In accordance with
Legisl. Decree no. 231 of 8 June 2001**

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Protocol no. 1: Protection of minors

**CIOFS FP SEDE NAZIONALE
CHILD SAFEGUARDING STANDARDS**

Goal

To define the necessary measures to ensure the protection of minors who are potential recipients of CIOFS / FP services, in particular by ensuring the timely implementation with respect to the activities aimed at minors of the control and management tools already present within the organization, both in accordance with the Italian law (legislative decree 231/2001 - organization, control and management for the prevention of administrative offenses) and with international technical standards applied on a voluntary basis (UNI EN ISO 9001 Standard- system standard for quality management).

Risks

Abuse of any kind (sexual, physical, verbal, moral) against minors who may come into contact with the activities promoted by the organisation

Approach

The approach used in this document is based on prior consideration of a number of factors needed to identify specifically the exposure to the risk of child abuse and the organizational framework of the entity with respect to the protection of minors.

These considerations, which are a prerequisite for child protection policy, may of course be modified in relation to any changes in the business or in the organization of the entity, which will result in a review of this procedure.

1) How, when and where the organization works with children and what risks this entails

training / information activities related to National or European Projects involving the participation of Minor Students.

national and / or transnational mobility management activities involving the beneficiaries recommended by the associations that are members of the Regional Network.

internship at the main office.

information activities, training and liaison with the labour market, also carried out through the web and social networks.

2) What policies and procedures are needed to prevent the abuse and how to respond to deal with it appropriately.

Currently the organisation has adopted a number of reference documents that are not directly related to minors, they are however suitable to set up an internal regulatory framework to fight against possible abuse towards all the recipients of the service. In particular, the above-reference documents include:

- A charter of values and training offer
- A code of ethics, according to the decree 231/01, which contains a set of principles and rules of conduct
- A risk analysis, according to the decree 231/01, with specific attention to crimes against personality and computer crimes

With respect to the organisation's management system the following organizational tools are specifically related to the protection of minors:

- I. identification of rules applicable to all activities and staff training on the statutory and regulatory requirements;
- II. Constant review of the quality policy, made known to all the stakeholders of the organisation;
- III. regular and traceable training of staff with actual verification of all training activities;

- IV. clear identification of responsibility for all employees of the organization;
- V. detailed agreements with any other entities with which the organisation cooperates;
- VI. selection, monitoring and evaluation procedures of providers, which may come into contact with any underage recipients of the activities;
- VII. insurance policies for accidents and civil liability;
- VIII. opportunity for all the stakeholders of the organisation, both internal and external, to file traceable complaints and reports;
- IX. obligation for the organisation's management to submit all reports received and that could have legal relevance for the supervisory body;
- X. periodic audits of the first and third part of all the requirements of the management system;
- XI. traceable procedures of non-conformities, corrective and improvement actions;
- XII. conducting periodic management reviews, which analyse all the data related to their activities, including those aimed at minors;
- XIII. Maintenance and organized collection of data related to customer satisfaction.

3) What are the people in charge as key figures within the organization to sort out and manage all matters relating to the protection of minors and the resulting internal investigation activities: the people responsible for the protection of minors, each based on the skills assigned, are the following:

- Quality manager: he/she receives all reports of critical issues both inside and outside the organisation (including those related to the protection of minors) and operates according to the relevant statutory procedures within the quality system

- Supervisory body: it has the task, according to Italian law, to review the adequacy and regular updating of the documents included in the offense prevention system (code of ethics, risk analysis, procedures), to carry out audits in line with the internal rules and analyse all the critical issues relating to corporate compliance, also with regard to the protection of minors.

Please indicate any other internal staff, starting with management, who have specific responsibilities with respect to the protection of minors.

4) What awareness raising, training and retraining activities are needed to ensure that the staff is familiar with the expectations of the organisation and what to do if there is a critical issue with respect to the protection of minors: at present all staff is fully trained on the content of the code of ethics, also with training sessions organized by the supervisory body, as well as on the procedures of the management system for the management of critical issues. specific training sessions on child protection have not been organised given the limited contacts of the organisation with minors, but in any case, following the adoption of this document, a dedicated training session will be organized. It is also envisaged that, for any activities that actually involve minors, specific operating guidelines will be adopted under this procedure, which will be the subject of training for the staff involved.

5) A clear code of conduct setting out unacceptable behaviours for staff working with minors: To supplement the above-mentioned general internal rules, starting from the code of conduct, the following section of this document contains a number of provisions intended to timely regulate business ethics which is required from all staff who may come in contact with minors.

6) How to safely select personnel with respect to the protection of minors: the quality manual of the organisation contains a procedure aimed at ensuring the compliance, on the part of staff to be employed, with legal / formal requirements for carrying out certain activities, as well as moral and behavioural requirements to cooperate with the organisation. The adopted selection methods are therefore deemed appropriate to ensure the proper identification of professionals authorised to interact with the minors. Since April 2014, the Italian law, also in accordance with EU legislation, has envisaged in certain cases also an obligation for the employer to ask for the judicial record certifying

that no convictions and prohibitive measures for sexual offenses against minors were ever recorded.

The selection procedures also relate to possible trainees / interns, who may come in contact with underage users only as a result of the careful verification of attitudes.

Policy (adopted along with the code of conduct and effective internal regulations)

1. Guiding Principles

The child safeguarding policy is based on the following principles:

- Zero tolerance with respect to the abuse of children;
- Preservation and protection of the interests of minors;
- Security and protection available to minors;
- Shared responsibility for the protection of minors;
- Opportunity for all staff (including volunteers) to provide precise answers to build confidence about the specific issues related to the protection of minors.

These principles are an integral part in preventing crime according to the system adopted by the Decree 231/01 and thus are part of the control tasks of the SB.

2. The protection of children is the responsibility of all employees

This child safeguarding policy aims to promote their dignity and their physical and moral well-being. All employees of the organisation who for different reasons come into contact with underage users, being adults and / or professionals or volunteers, shall assume this responsibility, including volunteers. No one within the organization, can refrain from intervening to protect children claiming that is not within their competence.

3. Children's rights

The child safeguarding policy is based on the following fundamental rights:

- The need for physical care and attention;
- The need to be encouraged intellectually;
- The need to be protected and feel safe;
- The need for social contacts and relationships;
- The right for their needs to be recognized and protected;
- The right to be protected from abandonment, abuse and exploitation;
- The right to be protected from discrimination;
- The right to be treated as a person recognized in their dignity.

4. Definition of abuse and neglect

Abuse and neglect are forms of child abuse. Someone can abuse a child by inflicting harm, or they may be held responsible of neglect by not taking action to prevent damage. Minors may be abused at home or in an institution or in a community setting by those who know or, more rarely, by unknown persons. They can be abused by one or more adults or by another child or more children.

Physical abuse

Physical abuse may involve hitting, shaking, throwing, stunning with different substances or poison, burns or scalding, drowning, suffocating, or otherwise, causing physical harm to a child. Physical damage can also be caused when a parent or guardian of the minor falsifies symptoms or deliberately causes an illness in the child.

Emotional abuse

Emotional abuse is the persistent emotional ill treatment of a child in such a way as to cause serious and lasting effects on his/her emotional development. This can occur by passing the message that the child does not count or making him/her feel that he/she is not understood, that he/she is inadequate or that his/her only value is meeting the needs of another person. It may consist in proposing expectations that presuppose an age and a development unfit to those of the child. There may be interactions that exceed the ability developed by the child at a given point, as well as an excessive protection and limitation of possibilities for discovery and learning. It may also consist in preventing the child from having normal social interactions.

Emotional abuse can include listening to and witnessing the abuse or bullying, that cause children to feel frightened or in danger. Exploitation or corruption of minors are also considered to be a form of abuse. A certain type of emotional abuse is present in any child abuse, even if alone.

Sexual abuse

Sexual abuse means forcing or inducing a child to participate in sexual activities, including prostitution, with or without them being aware of what is happening. Abuse can be the result of physical contact, including penetration (e.g. rape, sodomy and oral sex) or non-penetrative acts (palpation, caresses, kisses, etc.).

Abuse may include no-contact activities, such as involving minors in watching or taking pornographic images, witnessing sexual acts, or encouraging children to sexually inappropriate behaviours.

Negligence

Negligence is the persistent inability to meet the basic physical and psychological needs of the child, with the risk of causing serious damage to his/her health or development. Negligence can also occur during pregnancy because of substance abuse by the mother.

Once a child is born, a parent may be guilty of negligence by failing to ensure food, clothing and shelter (including sending him/her from home or abandoning him/her). Failing to protect the child from physical and emotional damage and dangers, to ensure adequate assistance, including entrusting him/her to people who follow him, or to guarantee adequate care and medical treatment are also considered forms of negligence.

Relevant age for sexual abuse

Minors are persons who are under 18 years of age; but the severity of the crimes is also proportionate to the fact that the victim has not turned 14 yet, or in other cases, 16 (see. 609 bis Italian Criminal Code; 609 cc).

5. Code of conduct of the organisation staff working in contact with minors

- 1) The physical punishment of children is not acceptable under any circumstances.
- 2) Verbal abuse against minors or the telling of jokes or stories of a sexual nature in the presence of minors, can never be acceptable. In case you need to make a conversation about sex-related issues with a child, you must be very careful and sensitive.
- 3) One should not isolate oneself with a minor. When you have to talk in private, it is only right that this happens in a suitable place, which does not give any reason for suspicion. Normally this takes place in an office with glass doors.
- 4) With respect to trips with children one should be very careful. No staff member should take a trip with a private vehicle alone with a minor. If, under certain circumstances, only one adult is available, there should be at least two minors for the entire trip. In an emergency, where it is necessary to make a trip with only one minor, you must inform the parent or guardian of the child as soon as possible.
- 5) Minors are not allowed to work or stay within the premises of the institution unless there are at least two adults present.
- 6) All minors must be treated with equal respect; favouritism is not acceptable.

- 7) No member of staff can take or tolerate a behaviour - verbal, psychological or physical - which could be understood as a form of bullying or abuse.
- 8) It is advisable not to spend too much time, and in any case not proportionate to the actual needs, with any minor or group of children. In no case shall a staff member give alcohol, tobacco or drugs to minors.
- 9) No member of staff in charge of service or other work with children is allowed to use alcohol, tobacco or drugs.
- 10) When you work with children you have to use age-appropriate language. Likewise, audio-visual material (such as mobile phones, the Internet, videos), and proposed activities must be in accordance to their age. Any sexually explicit or pornographic material is completely unacceptable.
- 11) The physical integrity of minors must always be respected.
- 12) The staff should not get involved in any inappropriate physical contact, including rough physical play, scolding and coarse jokes (tickling, playful fights). This should not prevent an appropriate contact in the situations where this is necessary for the safety and well-being of a minor (for example, when a child is in difficulty).
- 13) Avoid any act that could be interpreted negatively (palpation, touch, etc.).
- 14) The right to privacy of children should always be respected.
- 15) You must especially guarantee privacy, when the children are in the locker room, in the swimming pools, showers and toilets.
- 16) Do not take any pictures while children are in the locker room or in the bathroom.
- 17) Tasks that are strictly personal (e.g. when a child needs help to go to the bathroom, to wash or to change) should not be performed to minors, if they can do that themselves.
- 18) If the care of a child requires a personal meeting, this meeting should never be kept in an isolated environment. The times and places indicated for meetings with minors should ensure the transparency and accountability of educators (for example, they can be held in rooms with a glass window, where other people are present, or with the door open).
- 19) Both the duration and the number of meetings should be limited.
- 20) Parents or guardians should normally be informed of such meetings.
- 21) To send or to invite children in the home or community of lay people to deliver certain services or to retrieve material or for some other reason.
- 22) When you need to visit the home of a minor, a professional behaviour must always be observed.
- 23) Children with special needs or different abilities may depend on adults more than other children for their care and safety. For this reason, sensitivity in dealing with them and clear communication are particularly important.
- 24) Where it is necessary to perform personal tasks for a child with special needs (or disabilities), this should be done with the knowledge and full consent of the parents or guardians.
- 25) In performing these personal care tasks, you must show greater sensitivity and respect for the child and the above-said tasks should be carried out with utmost discretion.
- 26) Any personal care task that a child or a young person can do by himself/herself should not be undertaken by a person or by an educator.
- 27) In case of an emergency situation, when this kind of help is required, parents should be fully informed as soon as possible.
- 28) The staff should be informed that vulnerable children are more likely to be victims of bullying or other forms of abuse. Likewise, they may also be less clear in respect of physical and emotional limits.

29) It is particularly important that vulnerable children are listened to carefully, knowing that they may have difficulty expressing their concerns. One should not underestimate the importance of what they say.

30) All travel, trips or overnight stays, as well as parties, must be planned in time, taking adequately care of security with respect to transportation, equipment, meeting rooms, activities and emergencies.

31) A written consent from a parent or guardian must be obtained on time for each journey and for the related activities.

32) Where possible, a parent representative or any parents who offer to participate in the tour should be involved.

33) Parents or guardians should receive a copy of the itinerary and a copy of the contact information.

34) Specific assistance must be guaranteed for boys and for girls.

35) Rules and procedures to be implemented must be clear and made available publicly and their implementation should be guaranteed.

36) Special attention should be paid to ensure that children's privacy is respected when they travel.

37) Overnight stays must be planned in conformity with the safety criteria.

38) Accommodation areas for boys and girls should be separated, with the assistance of two adults of the same sex.

39) Under no circumstances should an adult sleep in a room with a minor.

40) No member of staff may establish or maintain "continuous" contact with children using personal online communication tools (e-mail, chat, social networks, etc.) if not authorized to do so by their superiors, who in turn, have the responsibility to verify the compliance with the requirements for the authorization of those contacts (compliance with the law and internal rules, consent of parents or guardians, if necessary ...)

41) You must never act in a way to shame, humiliate, belittle or despise a minor, or perpetrate any form of emotional abuse.

The above measures are of course not exhaustive; in any case, actions or behaviours that might be inappropriate or potentially abusive towards minors must be always avoided.

6. Becoming aware of a real or probable case of abuse

There are various ways in which abuse can be exposed:

- a child reveals the abuse;
- a person reveals that a child told him that another child has been abused or is experiencing abuse;
- a child may show signs of a physical injury with no explanation;
- disturbed behaviour of a minor may indicate that probably he / she is suffering some form of abuse.

7. Reporting abuse

Becoming aware of abuse can cause a range of emotional reactions, which are specific to each individual. Whatever may the reaction be and the ways in which abuse has become evident, real or suspected, there must be a proper reaction according to the procedure below. Even if the truth of the facts is not entirely certain, you have to give a prompt response.

To-do list

- ☑ Stay calm.
- ☑ Listen, hear and assess.
- ☑ Give the necessary time for a person to say what he/she wants.

- ☒ Be reassuring and explain that reporting the abuse was the right choice.
- ☒ Act immediately in accordance with the procedure set out in this child safeguarding policy.
- ☒ Write down verbatim, as soon as possible, what has been said. Report the incident to the chief of staff.
- ☒ Keep a copy of the report submitted.

Not-to-do list

- ☒ Do not panic.
- ☒ Do not react disproportionately.
- ☒ Do not ask for more information. Questioning the person reporting the incident can indeed influence the way in which the facts are going to be told later.
- ☒ Do not make assumptions, do not paraphrase what has been said and do not offer alternative explanations.
- ☒ Do not promise to keep things confidential or secret or that everything will be OK (could not be so).
- ☒ Do not take responsibility to deal with it personally.
- ☒ Do not make negative comments about the alleged abuser.
- ☒ Do not comment with colleagues on what has been said.
- ☒ Do not ask a child to tell the story again when it is not necessary.
- ☒ It is the duty of everyone who works with children to report abuse.
- ☒ It is not up to the staff to decide whether a suspicion or a charge are well-founded.

All suspicions or alleged charges should be taken seriously and dealt with in accordance with the procedures laid down by Italian law, cooperating with the relevant authorities within their respective competences.

Responsibility

The staff informed of suspicions, allegations or actual abuse shall be responsible to undertake appropriate action under this procedure.

The first person having suspicions, or to whom an abuse is revealed, must report it to the competent authorities and make sure that his/her concerns are taken seriously.

More specifically, any incidents should be reported immediately to the chief of staff who is in fact responsible for dealing with issues related to allegations or suspicions of abuse, as well as to the Supervisory Board constituted under Italian criminal law.

Staff should never personally take care of a suspicion, an accusation or a real episode of abuse.

Sometimes it can be hard to accept that something we have been told by a minor, or whoever he/she is, has to be dealt with by a colleague. But the welfare of a child must always be our priority, and therefore we have a duty to report suspicions, allegations or real episodes of abuse to the chief of staff.

Information should be reported even if there is a concern that the child would suffer damage. This also applies if you are unsure about your suspicions. Once a report has been submitted, the chief of staff will consult with the competent authorities.

As a precaution, the accused person (religious or lay) should be removed from service, without undermining his/her reputation. And if his/her innocence is proven, he/she shall be reinstated in service. In this case, it is important that his/her reputation is restored, if it has been sullied as a result of investigation.

8. Regularly review the child safeguarding policy

The child safeguarding policy will be reviewed annually by the management or even earlier, if necessary.

Later versions of this policy will be enriched by experience. The verification of compliance with this Protocol, and the adequacy of its content, must always be carried out in agreement with the Supervisory Board.

The violation of this Protocol by the staff constitutes a serious disciplinary breach and as such should be subject to disciplinary action.