

INTRODUCTION

States Parties shall protect the child from all forms of physical or mental violence, injury or abuse, neglect, maltreatment or exploitation, including sexual abuse. [UN Convention on the Rights of the Child (1989), Article 19].

Children and young people represent one of the FORMA.Azione's target groups in delivering education, training and guidance activities co-financed under regional, national and European programmes. In all actions concerning children and/ or young people, the best interests of the child/ young person shall be a primary consideration. The term "best interests" broadly describes the well-being of a child. Such well-being is determined by a variety of individual circumstances, such as the age, the level of maturity of the child, the presence or absence of parents, the child's environment and experiences. Its interpretation and application must conform to international legal norms, as well as with the guidance provided by the Committee on the Rights of the Child in its 2005 General Comment No. 6 on the treatment of unaccompanied and separated children outside their country of origin.

Given this, board and staff members, interns and external collaborators have a common commitment to the protection of children's rights and their best interests:

- in acknowledging the right of every child to be safe;
- in preventing child abuse;
- in educating children and young people on their rights, personal safety and how to act to deal with adversities;
- in integrating child protection into their organizational strategy and work practices.

Following such premises, FORMA.Azione shall ensure that the actions of any adult in the context of the work he/she carries out are transparent and safeguard and promote the welfare, safety and security of all children and young people. Therefore, this child protection policy provides specific guidelines for the organisation and its staff, interns and external collaborators working with children and young people to promote and create a safe environment where they can act and express themselves freely and protected.

It represents an operative tool for protecting children/ young people, staff, interns and external collaborators by clearly defining what actions are required in order to assure children and young people's safety and consistency of behaviours so that all staff follow the same procedures.

POLICY

Risks of harm can arise when individuals involved in activities pertaining to children and young people are in direct contact with them and/or are used as intermediates to represent children and young people, work and communicate with them. In order to avert or effectively address such risks, FORMA.Azione meets the commitment to protect children and young people by putting in place the following means:

- Staff, interns and external collaborators is committed to participate in targeted **information and training sessions** (paragraph §5.a) that illustrate the core principles of child protection (paragraph §3), so to ensure that members are properly informed and aware on the matter;
- board members and workers agreed upon specific **prevention measures**, based on principles number 5, 6 and 7 (paragraph §3), aimed at minimising the risks that may occur when working with children and young people (paragraph §5.b). Interns and external collaborators are made aware of such prevention measure, so as to collaborate with the referent staff member for the specific activity for putting into force such measures;
- board members and workers agreed upon specific **reporting measures** aimed at making clear to the staff what steps to take where concerns regarding the safety of children and young people arise (paragraph §5.c). Interns and external collaborators are made aware of such reporting measure, so as to collaborate with the referent staff member for the specific activity for initiating a reporting procedure;



- board members and workers agreed upon what are the responding strategies and means so as to ensure that action is taken to support and protect children and young people where concerns regarding possible abuse arise (see paragraph §5.d).

PRINCIPLES

1. Equal treatment (Non-Discrimination):

Children's rights apply to all children and young people without discrimination of any kind, irrespective of the child's or his/her parent's or legal guardian's race, colour, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth, sexual orientation, gender identity, or other status.

2 Best interests of the child:

Any activities undertaken by FORMA.Azione involving children and / or young people has to follow the best interest of the child/ young person, in agreement with child safeguarding policy abiding by European and international legally binding instruments as well as relevant policies, recommendations and guidelines.

3. Right to life and development:

Children and young people have an inherent right to life and to protection from violence, abuse, exploitation and neglect. Their right to development should be interpreted in its broadest sense, covering but not limited to the child/ young person's physical, mental, spiritual, moral, psychological, intellectual and social development.

4. The right to be heard:

Children and young people should be involved in decision-making at individual, organisation and policy level. They should be informed of and empowered to understand and enjoy their rights in full. They should be included in every procedure regarding their personal situation and they should be informed of the procedure to be followed where there is a situation concerning them.

5. Do not harm principle:

FORMA.Azione shall strive against and minimize any harm that may be caused inadvertently to children and/or young people as a result of its activities (paragraph §5.b).

6. Transparency and accountability:

Transparency and accountability shall transcend any action taken by FORMA.Azione in order to ensure that any harmful behaviour or practice shall be addressed and challenged appropriately (paragraph §5.c and §5.d).

7. Privacy:

All processing of personal data of children, including but not limited to communication and media activities, should be conducted in line with the relevant EU and national legislation in force. At the beginning of any activity involving a child/ young person or group of children/ young people, an informed consent form is given to each child's/ young person's legal tutor, to be given back to FORMA.Azione undersigned (see Annex 1). FORMA.Azione staff will archive such file for the entire duration of the activity and save it for the following 5 years, unless differently requested by the regulation of the public fund co-financing the activity due to reporting duties.



RESPONSIBILITIES

FORMA.Azione board of members (Sylvia Liuti, Anna Schippa, Luigi Tomaioli) are responsible for promoting, implementing and monitoring the present Child Protection Policy.

PROCEDURES

Training and code of conduct

The policy is shared with all staff members when they start to work within the organisation; new staff members working with children and youth are duly informed and made aware on the issue before starting the activities with the specific target groups. Interns and external collaborators working with children and youth on behalf of FORMA.Azione are equally informed and made aware about organizational policies on the matter of child protection and the prevention/reporting measures to follow, in case concerns arise.

As part of the informative process, all the interested parties listed above – internal and external to FORMA.Azione – are provided with a specific Code of Conduct, to be respected when working with children and young people (see Annex 2).

Prevention measures

The participation in FORMA.Azione projects and initiatives is open to all children and youth regardless of gender, sexual orientation, disability, ethnicity or religion. FORMA.Azione is committed to support children and staff members to report cases of abuse.

If coherent with the reference Programme objectives, FORMA.AZIONE includes child protection information into the projects to be submitted to regional, national and European authorities so to reach a broader audience and valorise the importance of protecting children.

Partnerships with individuals or other institutions (contracting and sub-contracting) shall not be in contrast with the scope and principles of this Policy and there will be a systematic checking towards this.

Finally, all staff members have to prevent and avoid the improper use of child and young person's images as prescribed by the Italian Law.

When taking, editing and using photos or videos featuring children and/or young people involved in FORMA.Azione's activities and projects, the following principles should be respected

- Make sure that the legal tutors of each child/ young person involved in the activity agrees that images of the child/ young person are taken. Such agreement is certified by undersigning an Informed Consent (Annex 1). The purpose of children's depiction in photos or videos should be made clear to the consent giver;
- Personal and physical information that could be used to identify the location of a child/ young person within a country and potentially put them at risk must not be used in any form of communication for general or public purposes;
- Information about children/ young people's lives and images of children/ young people (including information stored on a computer) must be kept in secure files with limited access, as foreseen in the Informed Consent. Access to such files should be strictly limited to those who need to use them during the course of their work;
- Images of children/ young people should portray the children in a dignified and respectful manner fit for their age and cultural and religious background.

Reporting measures

With reference to reporting of child-abuse incidents, FORMA.Azione requires the child's best interest to be the first priority. During activities where children and/ or young people are directly involved, they will be informed about FORMA.Azione's safeguarding policy, code of conduct and complaints mechanism in a child-friendly manner. In particular, if children and young people use the opportunities that arise in education and training settings to share personal information about matters such as abuse or neglect, the staff – with the support of interns and external collaborators (as agreed – paragraph §5.a) is required to do everything is possible to enable the young person to share what they wish to share and to give supportive response to children/young people: they have to listen respectfully, to show care and allow the child/young person time.

Staff are required to:

- take seriously any concerns raised;



- in case a concern arises, figure out what has happened and establish the facts in the most objective and immediate manner possible thanks to the intervention of the referral person. After assessing the reported concern, they submit their conclusions and suggestions to FORMA.Azione Board Members;
- take positive steps to ensure the protection of children/ young people who are the subject of any concerns by sharing the arisen issues with the Board Members;
- support children, staff or other adults who raise concerns or who are the subject of concerns, to listen to and takes seriously the views and wishes of children/ young people;
- report serious maltreatment/harm/abuse concerns or allegations to the competent local authority and ask for advice, in the person of one of the members of the FORMA.Azione Board. The advice given shall be followed. Depending on the case, it may initiate judicial proceedings and/or other disciplinary process.

Where concerns exist about the conduct of FORMA.Azione board members, staff, interns and/or external collaborators in relation to Child protection and/or where there has been a breach of the Child Protection Policy, this will be investigated under this policy by consideration of referral to statutory authorities for criminal investigation under the national law; and/or by FORMA.Azione in accordance with disciplinary procedures. Breaches of this policy and failure to comply with the responsibilities mentioned herein may incur in:

- concerning staff members and interns disciplinary action leading to possible dismissal depending on the severity of the incident;
- concerning external collaborators up to and including termination of all relations including contractual and partnership agreements with FORMA.Azione.

Responding measures

FORMA.Azione board of members are accountable for responding to child safeguarding problems within the frame of the reference Child Protection Policy and national law.

ACCOUNTABILITY

FORMA.Azione monitors and reviews its safeguarding measures at least once a year, during the Management Review of the Internal Quality System Management, according to specific indicators:

- N. of staff members trained/updated;
- Participants' satisfaction rate with reference to training and update activities;
- N. of reported issue with reference to child safety;
- N. of responding action undertaken with reference to child safety;
- N. of Non Conformance Report (NCR) issued with reference to child safety.



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The present document can be consulted online in Italian and English at www.azione.com

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ANNEX 1 – INFORMED COSENT FORM - ITALIAN

**LIBERATORIA/AUTORIZZAZIONE
PER LA REGISTRAZIONE E LA PUBBLICAZIONE DI FOTO E VIDEO**

Il/La sottoscritto/a

Cognome _____ Nome _____

Nato/a a _____ Prov. _____ Il _____

Residente a _____ Prov. _____ Via _____ n° _____

C.F. _____

Tutore legale del minore _____ (cognome) _____ (nome)

Nato/a a _____ Prov _____ Il _____

Residente a _____ Prov _____ Via _____ n° _____

C.F. _____

con riferimento agli incontri online organizzati dall'azienda FORMA.Azione SRL, sede legale in via L.Catanelli n.19, 06135 Perugia, P. IVA 02800590545, nell'ambito dell'iniziativa *TITOLO DELL'INIZIATIVA*

con la presente

AUTORIZZA

A titolo gratuito, senza limiti di tempo, anche ai sensi degli artt. 10 e 320 cod.civ. e degli artt. 96 e 97 legge 22.4.1941, n. 633, Legge sul diritto d'autore, alla registrazione video delle sessioni formative online ed alla pubblicazione e/o diffusione in qualsiasi forma delle immagini relative al minore in questione sui canali digitali di FORMA.Azione e del progetto TITOLO PROGETTO, su carta stampata e/o su qualsiasi altro mezzo di diffusione, nonché autorizza la conservazione delle foto e della registrazione negli stessi negli archivi informatici dell'azienda e prende atto che la finalità di tali pubblicazioni sono meramente di carattere informativo ed eventualmente promozionale.

La presente liberatoria/autorizzazione potrà essere revocata in ogni tempo con comunicazione scritta da inviare via posta comune o e-mail a segreteria@azione.com.



FORMA.Azione

Luogo e Data: _____

In fede: _____

Informativa per la pubblicazione dei dati

Informativa ai sensi dell'art. 13 del D. Lgs. n. 196/2003. Si informa che il trattamento dei dati personali, informa che i dati personali conferiti con la presente liberatoria saranno trattati con modalità cartacee e telematiche nel rispetto della vigente normativa e dei principi di correttezza, liceità, trasparenza e riservatezza; in tale ottica i dati forniti, ivi incluso il ritratto contenuto nelle fotografie suindicate, verranno utilizzati per le finalità strettamente connesse e strumentali alle attività come indicate nella su estesa liberatoria. Il conferimento del consenso al trattamento dei dati personali è facoltativo. In qualsiasi momento è possibile esercitare tutti i diritti indicati dall'articolo 7 del D. Lgs. n. 196/2003, in particolare la cancellazione, la rettifica o l'integrazione dei dati. Tali diritti potranno essere esercitati inviando comunicazione scritta.

Presto il consenso

Nego il consenso

Luogo e Data:

Firma (leggibile)



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ANNEX 2 – CODE OF CONDUCT

The present Code of Conduct foresees that adults participating in activities involving or concerning children and/ or young people are requested to:

- Respect all relevant laws concerning the protection of children and young people in the country where the activity takes place;
- Respect all relevant European and international framework concerning the protection of children and young people;
- Observe the principles outlined in this policy;
- Inform children and young people of their rights in a way fit for their age/cultural background/maturity, including by identifying the person, authority or service where to seek advice/complaint in case of problem;
- Be conscious of perception and appearance in their language, actions and relationships with children and young people; their behaviour should demonstrate respect for children and young people and their rights;
- Guarantee that all physical contact with children and young people is appropriate in the relevant cultural contexts;
- Encourage children and young people to discuss their contact with staff or others and to raise any relevant concerns;
- Take action as required by the present policy when they become aware or suspect that a child has experienced or is experiencing abuse;
- Cooperate with child protection related investigations (internal and external) and take steps to make available any documentation or other information necessary for the completion of the investigation;

The present Code of Conduct foresees that adults participating in activities involving or concerning children and/ or young people are forbidden to:

- Spend time alone with children and/or young people away from others;
- Use any physical form of punishment on a child/ young person;
- Discriminate against, show different treatment towards, or favour particular children/ young people to the exclusion of others;
- Expose children to hazardous conditions;
- Violate any of the children's rights.



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