

CHILD SAFEGUARDING POLICY

1. INTRODUCTION & PURPOSE	2
1.1 What is a Child Safeguarding Policy	2
1.2 Why a Child Safeguarding Policy	2
1.4 Strategic and operational context 2025 -2027	4
1.5 Definitions of harm	5
2. VISION AND MISSION	7
2.1 Vision	7
2.2 Mission	7
2.3 Commitments to the protection	8
3. ADHERENCE TO EU VALUE	8
4. CHILD SAFEGUARDING POLICY IN ACTION	9
4.1 Purpose & Scope	9
4.2 Guiding Principles	9
4.3 Roles & Responsibilities	10
4.4 Standard Procedures, Protocols and Conduct	11
a) Safe Recruitment & Selection	11
b) Code of Conduct	12
Do	12
Don't	13
c) Reporting Concerns	13
Internal Reporting procedure	14
External reporting to Child Protection Authorities	15
d) Consent	17
Parental consent	17
Children consent	17
e) Online Safety and communication guidelines	17
Promotion of Gender-neutral and Non-Stereotypical Narratives	18
No Depictions of Suffering or Harm to Children	18
f) Training	19
4.7 Monitoring & Review	19
4.8 Communication & Dissemination	20
Annex 1 - Declaration of commitment	22
Annex 2 - Recognising abuse	23
Annex 3 - Internal Report Form	25

1. INTRODUCTION & PURPOSE

1.1 What is a Child Safeguarding Policy

Child safeguarding refers to an organization's responsibility to always protect the children and young people they come into contact with from all forms of violence and inappropriate conduct. In organizations, preventing abuse requires protocols and procedures but also leadership, accountability, and cultural change.

Organizations have to make sure their staff, operations, and programmes do no harm to children, that is, they do not expose children to the risk of harm and abuse, and that any concerns the organization has about children's safety within the communities in which they work, are reported to the appropriate authorities.

"Do no harm" is a principle that has been used in the humanitarian sector but can equally be applied to the development field. It refers to organizations' responsibility to minimize the harm they may be doing inadvertently as a result of their organizational activities

It means also listening to girls and boys and transforming the entire organization's structure to put their rights, dignity, and safety at the heart of every decision.

1.2 Why a Child Safeguarding Policy

Fondazione European Research Institute (ERI) ETS firmly believes in the importance of protecting, defending and spreading the rights of children, including that of being protected from all forms of violence, abuse or physical and verbal exploitation in accordance with the provisions of the UN Convention on the Rights of the Child and Adolescent by the Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse (Lanzarote Convention, 2007). All children have the right to be safe and every organisation has the responsibility to protect children from harm.

Since 2011, the aspiration for improvement, the sparkle of life in our organization, has been developed through projects and continuous training activities to educate staff into specific and appropriate methodologies and approaches. Each time this has made it possible to demonstrate the power of our original intuition and person-oriented approach to promote social change. This Child Safeguarding Policy, consisting of reflections, models, and tools, represents Fondazione European Research Institute ETS's full accountability and monitoring of its activities. We want to make sure that ERI's educational, project, and programmes staff do everything in their power to report and respond to the children's risks of abuse, violence and

exploitation, particularly sexual exploitation.

Fondazione European Research Institute (ERI) ETS is committed to the safety and well-being of all children we work with. We recognize **that children are particularly vulnerable and require special protection**. This policy outlines our commitment to ***creating a safe and supportive environment for children, preventing abuse and harm, and responding appropriately to any concerns***. We adhere to the principles of the United Nations Convention on the Rights of the Child (UNCRC) and all applicable national and local laws related to child protection.

1.3 Risk evaluation to the child's safety

ERI will identify, prevent, monitor, and mitigate any risks that might be imposed on children as a result of its staff, operations and activities. The areas of work of ERI might involve children when working directly with housing, environmental education, clean ups, families, young people and students even if children are not the main target of ERI activities. In fact they could be involved or indirectly through activities, projects and services directly delivered to their parents, family and/or caregivers.

ERI and its personnel need to consider in each specific project whether they are working with children and how they would adapt the project to protect them.

From the very beginning of any project that involves children, a comprehensive risk assessment should be conducted by project writing staff to evaluate potential risks to the safety and well-being of children. This risk evaluation should be done before any action is taken.

Risk Areas to be considered:

- **Privacy and Data Protection:** How personal data (e.g., photos, contact details) will be handled, ensuring compliance with GDPR and minimizing the risk of exploitation.
- **Exposure to Inappropriate Content:** If the project involves creating or sharing content (e.g., digital media, educational materials), evaluate the risk of children encountering harmful content or harmful interactions.
- **Cybersecurity Risks:** If children are interacting online, evaluate cybersecurity risks such as hacking, phishing, or unauthorized access to personal information.
- **Physical Safety:** If the project involves physical activities (e.g., field trips, workshops), assess risks related to transportation, safety during events, and the physical environment.

	ACTIVITY	WHEN	LEAD	PARTICIPANTS
1	ANNUAL PLANNING OF ACTIVITIES	JANUARY EVERY YEAR	FOCAL POINT (FP) AND DESIGNATED SAFEGUARDING LEAD (DSL)	WHOLE TEAM
2	PROJECT PREPARATION AND SUBMISSION OF ALL PROJECTS/BUDS	ONCE DURING THE PROJECT PREPARATION	PROJECT MANAGER (PM) AND PROJECT WRITER	TEAM MEMBERS APPOINTED BY THE PM
3	PROJECTS/BIDS/ACTIVITIES THAT HAVE CHILDREN AS A DIRECT TARGET GROUP	ONCE A YEAR, FOR EACH PROJECT/BID/ACTIVITY	PROJECT MANAGER/STAFF RESPONSIBLE FOR THE ACTIVITY	TEAM MEMBERS APPOINTED BY THE PM/RESPONSIBLE STAFF

1.4 Strategic and operational context 2025 -2027

ERI adopted its first Child Protection Policy in 2025. This document is, in fact, the first Policy. Due to the transformation of the Association ERI ONLUS into non-profit Foundation in December 2022, the management Board decided to adopt policy in order to show the **importance and the commitment of the organization in designing projects and programs minimizing risk of harm to the children**, The organization take and will take into consideration project and programmes come into contact with or impact upon directly or indirectly on children by taking sufficient account of their safety, whatever the focus of the work.

This policy applies to all individuals working with ERI, including:

- Employees (full-time, part-time, and temporary)
- Volunteers
- Civic Service Volunteers
- Trustees and Board members
- Partners and contractors
- Interns
- Anyone representing Foundation in any capacity.

This policy applies to all activities and settings where children are involved, including:

- Direct program/project delivery
- Events and workshops
- Online activities and communication
- Field visits and community engagement
- Any interaction with children related to the Foundation's work.

1.5 Definitions of harm

It is difficult to define “**harm**” to children because children can be abused in so many ways depending on the context and culture. They may be abused in a family, an institution, community or faith setting, or via social media/internet. They may be harmed by an adult or adults or another child or children. There are also practices such as female genital mutilation (FGM), forced or early marriage that cause significant harm to children.

The following definitions can be used as a **guide**:

Child: Any person under the age of 18 years.

Child Abuse/Harm: Includes physical abuse, sexual abuse, emotional abuse, neglect, and exploitation, whether perpetrated online or offline, as defined above.

Designated Safeguarding Lead (DSL): The individual responsible for overseeing child safeguarding within Fondazione European Research Institute (ERI) ETS.

Concerns: Any information or suspicion that a child may be at risk of harm.

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

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.

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 different 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 neighborhoods. It may also involve opportunistic or organized networks of perpetrators who profit financially from trafficking young victims between different locations to engage in sexual activity with multiple men.

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.

Emotional abuse: persistent emotional maltreatment that impacts on a child's emotional development. Emotionally abusive acts include restriction of movement, degrading, humiliating, bullying (including cyber bullying), and threatening, scaring, discriminating, ridiculing or other non-physical forms of hostile or rejecting treatment.

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.

2. VISION AND MISSION

2.1 Vision

European Research Institute (ERI) is a non-profit organization that promotes research and experimentation for innovation in scientific and social fields. Its main objectives are to improve the economic and cultural conditions of European citizens and promote respect for the environment, the territory and the living being. The association is a laboratory of ideas able to adopt and promote the most innovative proposals in the social, educational, cultural, and occupational fields, with the support of the European Union and the local players.

ERI is committed to promoting **cohesion** and **social equity, respect for fundamental rights**, and **cultural diversity**, in order to create **equal opportunities** and **fight discrimination**. The association is currently collaborating with public institutions, startups, and local businesses, availing itself of the support of more than ten contributors, which provide their specialized skills, like design, communication, administrative management, and logistics specialized skills.

2.2 Mission

Since its establishment, ERI has been fully committed to promoting actions to ensure well-being, protect and promote rights, and foster the development of communities.

For ERI, ensuring children's well-being means creating opportunities for a dignified, intense, and gratifying life. It means offering children the possibility to eat appropriately, be cared for, receive medical treatment, carry out recreational, sporting, and social activities according to age, and cultivate their most intimate aspirations freely.

For our organisation, the commitment to the protection and promotion of rights means building every project and every intervention following the guidelines defined by the United Nations International Convention on the Rights of the Child, improving life contexts such as family, school, community and making them safer, richer in opportunities, more suitable for the life of children and their constructive growth.

Promoting development means looking at the child as he or she may become, aiming at the inner growth of a mature and responsible individual, interpreter of vibrant life, capable of contributing proactively, consciously, and responsibly to the improvement of the surrounding environment.

The Foundation aims to generate change and promote sustainability in the disadvantaged contexts in which it operates.

2.3 Commitments to the protection

- No violence against children is justifiable.
- A rights-based approach to children care and protection requires a paradigm shift.
- While respecting and promoting human dignity and physical and psychological integrity, children should always be considered individuals with rights rather than 'victims'.
- The concept of dignity requires that every child be recognised, respected, and protected as a rights-holder and a unique and valuable human being with an individual personality, specific needs, interests, and privacy.
- Children's rights must be listened to and their views considered in all decision-making processes. Similarly, children's empowerment and participation shall be fundamental to childcare and protection strategies and programmes.
- Children's best interests must be a primary consideration in all matters involving or affecting them, mainly when they are victims of violence and when preventive measures are to be adopted.

3. ADHERENCE TO EU VALUE

By the adoption of the Child Safeguarding Policy, ERI works for a widespread diffusion of EU

values: inclusion, tolerance, justice, solidarity and non-discrimination prevail. These values are an integral part of our organization life:

HUMAN DIGNITY

Human dignity is inviolable. It must be respected, protected and constitutes the real basis of fundamental rights.

FREEDOM

Freedom of movement gives citizens the right to move and reside freely within the Union. Individual freedoms such as respect for private life, freedom of thought, religion, assembly, expression and information are protected by the EU Charter of Fundamental Rights.

DEMOCRACY

The functioning of the EU is founded on representative democracy. Being a European citizen also means enjoying political rights. Every adult EU citizen has the right to stand as a candidate and to vote in elections to the European Parliament. EU citizens have the right to stand as candidates and to vote in their country of residence, or in their country of origin.

EQUALITY

Equality is about equal rights for all citizens before the law. The principle of equality between women and men underpins all European policies and is the basis for European integration. It applies in all areas. The principle of equal pay for equal work became part of the Treaty of Rome in 1957. Although inequalities still exist, the EU has made significant progress.

RULE OF LAW

The EU is based on the rule of law. Everything the EU does is founded on treaties, voluntarily and democratically agreed by its EU countries. Law and justice are upheld by an independent judiciary. The EU countries gave final jurisdiction to the European Court of Justice which judgements have to be respected by all.

HUMAN RIGHTS

Human rights are protected by the EU Charter of Fundamental Rights. These cover the right to be free from discrimination on the basis of sex, racial or ethnic origin, religion or belief, disability, age or sexual orientation, the right to the protection of your personal data, and or the right to get access to justice.

4. CHILD SAFEGUARDING POLICY IN ACTION

4.1 Purpose & Scope

This policy aims to:

- Establish clear **guidelines** for preventing and responding to child abuse and harm.
- Define the **roles and responsibilities** of all staff, volunteers, partners, and contractors in

safeguarding children.

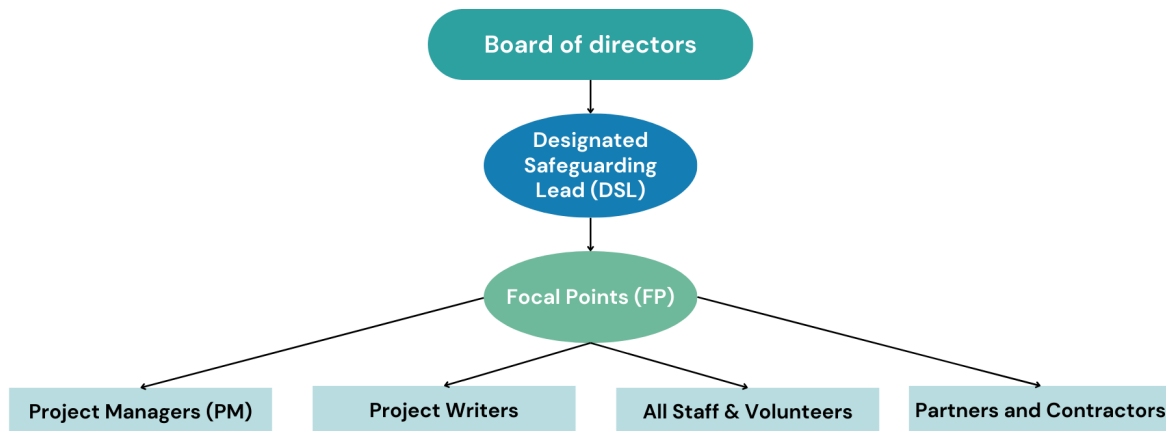
- Promote **standard procedures, protocols and behaviours** for all staff, volunteers, partners, and contractors in safeguarding children.
- Provide a **framework for reporting** and managing child safeguarding concerns.
- Promote a **culture of vigilance and awareness** regarding child safeguarding.

4.2 Guiding Principles

Best Interests of the Child: The child's well-being is paramount in all decisions and actions and all actions on child safeguarding are taken in the best interests of the child.

- **Prevention:** Proactive measures are essential to prevent abuse and harm.
- **Responsibility:** Everyone has a responsibility to safeguard children. Organisations have a duty of care to children with whom they work, are in contact with, or who are affected by their work and operations. If organisations work with partners, they have a responsibility to help partners meet the minimum requirements on protection.
- **Respect:** Children's rights and dignity are respected at all times.
- **Confidentiality:** Information is shared on a need-to-know basis, prioritizing the child's safety.
- **Transparency:** Procedures are clear and accessible.
- **Empowerment:** Children are encouraged to express their views and concerns.
- **Non-Discrimination:** All children are protected regardless of their background or circumstances.
- **Equal rights:** All children have equal rights to protection from harm.

4.3 Roles & Responsibilities



Board of Directors:

- Ensure the policy is implemented and regularly reviewed.
- Provide adequate resources for safeguarding.
- Promote a culture of safeguarding.
- Ensure that child protection principles are embedded into all aspects of the organization's operations, including project design, implementation, and monitoring.

Designated Safeguarding Lead (DSL):

- Act as the superior point of contact for Focal Point for safeguarding concerns.
- Provide advice and support to Focal points, staff and volunteers.
- Maintain accurate records.
- Liaise with external agencies.
- Ensure proper training.
- Regularly assess the effectiveness of child protection strategies and implement necessary adjustments to improve safety measures.
- Ensure and supervise the response to any child protection incidents or concerns.

Focal points (FP)

- Act as the primary point of contact for safeguarding concerns and refer it to DLS
- Support DLS in monitoring the policy and training the staff
- Provide advice to PM and staff members
- Manage the response to any child protection incidents or concerns that arise

during the project, in collaboration with the PM.

Project Managers (PM)

- Collaborate with the Project Writer and Focal Points to integrate child safety measures into the project framework
- Monitor the respect of the policy during the project implementation
- Refer any concern to Focal points
- Manage the response to any child protection incidents or concerns that arise during the project, in collaboration with the Focal Point.

Project writers

- Ensure that child protection considerations are incorporated into the project's objectives, strategy, and design from the outset.
- Evaluate risks, measures and strategies directly with DSL.

All Staff & Volunteers:

- Read and understand this policy.
- Report any concerns immediately to the DSL.
- Adhere to the Code of Conduct.
- Participate in safeguarding training.

Partners and Contractors:

- Adhere to the foundation's safeguarding policies when working with children.
- Ensure their staff and volunteers are properly vetted.

4.4 Standard Procedures, Protocols and Conduct

a) Safe Recruitment & Selection

As a condition for working with ERI, all staff, management and board members, interns, and volunteers, and all those acting on behalf of ERI, such as members, consultants or trainers, are required to both accept and commit to ERI's Child Protection Policy by signing a statement of commitment declaring that they will adhere to its principles and procedures. This statement will be included in their service contracts, in case of projects involving children. (Annex 1).

This includes the recruitment and appointment process:

- Staff, volunteers, interns, and consultants are recruited to clear job or role descriptions that include, if applicable, a statement on the position or role's responsibilities to meet the requirements of ERI's Child Protection Policy
- All job interviews should include a discussion on child safeguarding and protection, the candidate's understanding of this and ERI's commitment to child safety.
- Adherence to ERI's Child Protection Policy is part of ERI employment contracts and service agreements if the role includes activities with children.

- While designing the call for engagement description, analyse the role and consider the issues of child safeguarding and risk.

b) Code of Conduct

ERI's Code of Conduct applies to all staff, volunteers, interns, management, board members, consultants, and advisers, covering both in-person and online activities. The organization is dedicated to protecting children from abuse and exploitation and will thoroughly investigate all abuse allegations according to its child protection policy, regardless of the source or nature of the referral.

The **Code of Conduct** provides guidance on ethical adult behavior towards children and appropriate behavior between children. It prioritizes the best interests of the child and should be followed with transparency and common sense. The Code also includes specific guidance on the responsible use of social media, see below **Online Safety**.

Do

- Be aware of what constitutes child abuse and exploitation (included in the child protection policy) and understand the provisions determined in the child protection policy.
- recognize signs of abuse and report any suspicious observations immediately to the Child Protection Focal Point and DSL.
- Ensure that you know who the Child Protection Focal Point and DSL are.
- Respect lines of authority and reporting procedures.
- Respect others' basic rights by treating them fairly, honestly, and tactfully, and by treating people with dignity and respect.
- Treat all children equally: be inclusive and involve all children without discrimination.
- Work actively to ensure the highest levels of respect towards each other.
- Maintain high standards of personal and professional conduct.
- Protect the health, safety and well-being of yourself and others.
- Be aware of high-risk peer situations (e.g. unsupervised mixing of older and younger children and possibilities of discrimination against children).
- Be aware of the potential for peer abuse (e.g. bullying).
- Be concerned about how your language, actions, and relationships with children could be perceived.
- Develop special measures/supervision to protect younger and especially vulnerable children from peer and adult abuse.
- Provide an environment encouraging children's personal, physical, social, emotional, moral and intellectual development.
- Encourage and respect children's voices and views.
- Limit access to and/or do not expose children to inappropriate electronic material.
- Always respect the confidentiality of children's personal information.
- Obtain (written) consent from the child and/or parent/carers when photographing, filming

or requesting personal information for activities.

- When using social media, be aware of how the content you share can affect children.
- When using social media, use an appropriate tone and style of expressing yourself.

Don't

- Engage in any form of sexual activity with children.
- Commit any acts or behave in any way that could be construed as poor practice or potentially abusive. For example, never behave in an inappropriate or sexually provocative manner.
- Have a child stay overnight in the adult's room or sleep in the same bed (unless prior consent is provided by both the child and their parent/guardian).
- Perform activities for children that they can do themselves, including dressing, bathing and grooming.
- Discriminate, shame, humiliate, belittle, or degrade children. This includes anything that may be considered emotional abuse (e.g. using language that will psychologically or emotionally abuse a child or telling a story/show pictures that will mentally or emotionally abuse a child).
- Hit or otherwise physically assault anybody.
- Act in any way that may be abusive or place others at risk of abuse.
- Condone violations of this code by others (staff, interns, consultants, etc.).
- Be alone with a child in any circumstances that others might reasonably question.
- Allow children to engage in sexually provocative games with each other.
- Kiss, hug, fondle, rub, or touch a child in an inappropriate or culturally insensitive way (e.g. do not initiate physical contact, such as holding hands, unless initiated by the child).
- Suggest inappropriate behaviour or relations of any kind or encourage any infatuation by a child.
- Take photos, film or request personal information if not required for ERI activities.

c) Reporting Concerns

All staff, volunteers, interns, members, and service providers should be vigilant in recognizing signs that may indicate a child is in need of assistance. Similarly, they must remain attentive to signs that suggest ERI's activities or operations could potentially harm children. There is a responsibility to report any observed, suspected, or alleged violations of Child Protection Policy.

Recognizing that reporting an incident (Annex 2) can be complex, this procedure is made readily accessible to ensure everyone understands the appropriate steps to take concerning the safety of children and other witnesses. (see Annex 3)

ERI acknowledges that children may be harmed by its staff, members, associates, or as a result of its activities. When a child protection or safeguarding concern arises, follow the **ACT approach**:

- **Act:** Address your concerns promptly; if unsure, speak up.
- **Child-centered:** Always prioritize the protection of children.
- **Time-sensitive:** Respond quickly, effectively, confidentially, and appropriately to safeguarding concerns.

Internal Reporting procedure

All witnessed, suspected, or alleged violations of the ERI Child Protection Policy must be immediately reported to the Focal Point (FP). Reports can be made orally if a child is at immediate risk or via the safeguarding reporting form in other cases. The child's safety is the top priority.

The FP will inform the DSL and DSL will inform the Board, and if an ERI staff member or associate is accused, temporary suspension may be considered. The FP assesses the risk to the child and takes with DLS necessary actions to ensure their safety, such as notifying local authorities or child protection agencies if needed.

Key steps in the procedure

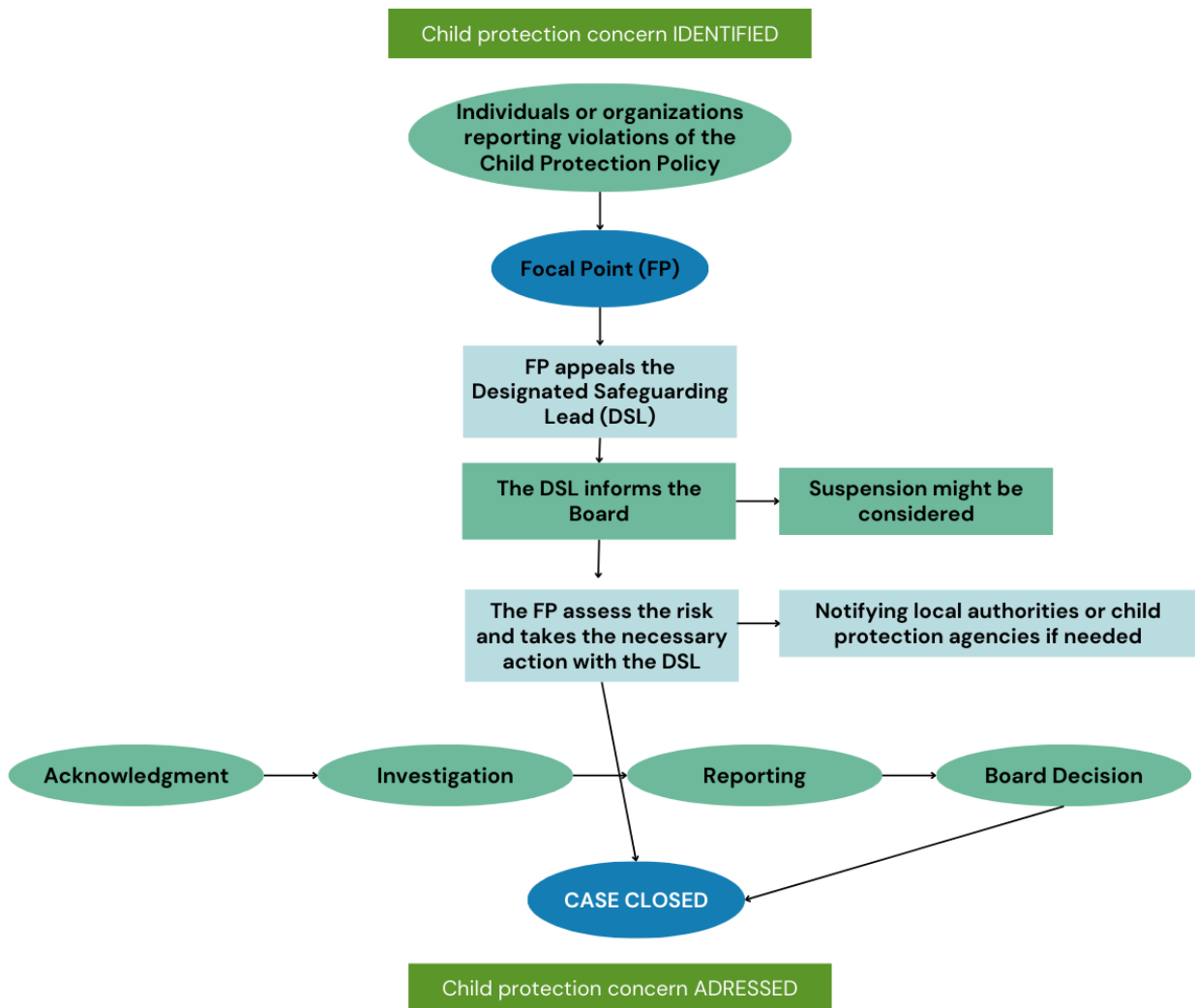
Acknowledgment: FP confirms receipt of the report and informs the reporting party about ERI's procedures.

Investigation: The FP inform DSL , together conduct a confidential internal investigation, gathering relevant information and consulting experts as needed

Reporting: After completing the investigation, the DLS submits a report to the Board.

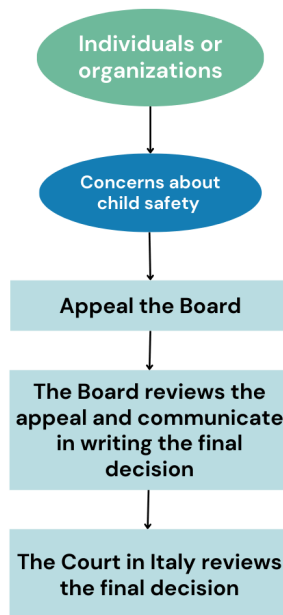
Board Decision: The Board determines whether harm occurred and, if so, decides on appropriate actions, including reporting to authorities, holding staff accountable, and offering support to the child. In this phase meetings could be organized with DLS, Focal Points and experts.

If the case involves an ERI staff member, actions may include warnings, capacity-building measures, or termination of contracts/membership. **Support will be offered to the survivors (e.g psychological support), including referrals to relevant organizations.**

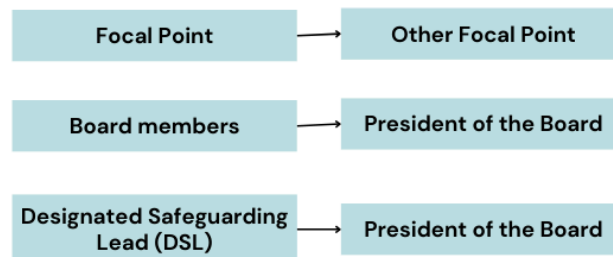


Appeals

Individuals or organizations can appeal the Board's decision within one week. The appeal will be reviewed by the Board and the final decision communicated in writing. If the appeal concerns remain unresolved, they can be referred to a court in Italy.



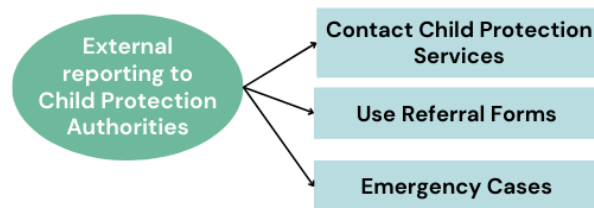
To ensure fairness, all professionals involved in the process must avoid conflicts of interest. If there is a conflict, the individual must be replaced. External experts may also be consulted if needed. If the concern referred to one of Board members or DLS or Focal Point it must be replaced as suggested below.



Online Reporting Form: A web form that allows individuals to anonymously submit complaints about child safety, harassment, or inappropriate content will be created in a long term perspective. (within the end of the strategic period: 2027).

External reporting to Child Protection Authorities

According to EU regulations, organizations are required to report serious child protection concerns to external authorities if there is a risk to the child's safety. These include local child protection services, law enforcement, or other specialized bodies.



1. **Contact Child Protection Services:** In case of suspected abuse or neglect, the **DSL** must immediately report the matter to local child protection authorities or law enforcement agencies, depending on the severity of the situation.
2. **Use of Referral Forms:** Many child protection systems provide referral forms that need to be filled out to report the case. These forms typically require the details of the incident, the child's information, and any immediate action taken by the organization.
 - a. **Tribunale per i Minorenni** (Juvenile Court of the City in which the event occurred)
This court oversees matters related to minors, including child protection cases. While specific referral forms aren't provided online, contacting them can guide you on the appropriate procedures.
3. **Emergency Cases:** If the case is urgent (e.g., imminent harm to the child), the referral should be made immediately through phone or secure online systems.
 - a. **Telefono Azzurro:** A national helpline offering support to children and adolescents facing abuse or exploitation. They operate a 24/7 toll-free number, 114, for emergencies. archive.crin.org
 - b. **Helpline Minori Migranti by Save the Children:** A multilingual helpline providing assistance to migrant minors, their families, and professionals. They can be reached at 800141016 (toll-free) or via email helplineminorimigranti@savethechildren.org.
 - c. In case of imminent danger, it's crucial to contact **local emergency services** immediately by dialing in Italy **112**, which connects to police, medical, and fire emergency responders.
 - d. Additionally, the **European child helpline number, 116 111**, is available for reporting incidents and seeking assistance across EU member states.

In these procedure is necessary to record and report keeping:

- Maintain accurate and confidential records and reports.
- Store records and reports securely in compliance with data protection regulations.
- Document all actions taken.

ERI will coordinate the CPP with the Whistle Blowing Policy that is not active yet within the organization and that it intends to define by the end of 2025.

d) Consent

Verify the parental consent, especially if the activities request particular engagement such as psychological support or similar action.

Parental consent

The PM of each project/service implemented has to verify the obtained consent . The explicit, free and informed consent of both parents or the parent exercising parental responsibility is required for the participation of the minor child in the activity, as well as for the processing of personal data (including the use of images) of the same. In the event of one of the parents being prevented from exercising parental responsibility, the other parent may self-certify that he/she is the only one exercising parental responsibility pursuant to art. 317 of the civil code and give consent alone.

Children consent

To ensure the participation of children in decisions that concern them, it is advisable to ask, in addition to the consent of the parents exercising parental responsibility or of the guardian, the consent of the children themselves. Such consent must be preceded by adequate information, carried out in a manner and with content that takes into account the age and degree of maturity of the child or girl. In the case of children over 12 years of age, or even younger if assessed as having the capacity for discernment,

it is advisable to provide a written information sheet and to request the signature of the child. In the case of children under 12 years of age, it is recommended to prepare and present an information sheet, created with methods and contents that take into account the age and degree of maturity of the child in order to make them as aware as possible.

The consent form is located within the internal policies of the organization regarding privacy and data processing in compliance with the GDPR and national law. ERI is committed to creating simplified forms to facilitate understanding by children.

e) Online Safety and communication guidelines

- **Ensure** children only access age-appropriate content, and set up parental controls or filters
- **Monitor** online interactions with children and minimize it only if necessary and previewed in the project actions.
- **Educate** children about online safety, in case of projects in which social networks or web interactions are requested.
- **Ethical Representation:** All content, whether images, videos, or written narratives, must

avoid any form of exploitation, particularly the so-called “poverty pornography” or any content that exploits the suffering or vulnerabilities of children for emotional, political, or financial gain.

- **Respectful Storytelling:** The narrative surrounding children, particularly in sensitive circumstances, must be respectful and aimed at raising awareness or creating positive change rather than sensationalizing their suffering.
- **Sensitive Content Review:** All content must be reviewed for ethical implications, ensuring it does not portray children in ways that could lead to harmful stereotypes or perpetuate negative biases about certain communities or circumstances.
- **Consent and Permission:** Any use of a minor's image or likeness must be accompanied by clear, informed consent from the child's parent or legal guardian. This includes all forms of media such as photographs, videos, or other digital representations.
- **Image Release Forms:** In accordance with privacy laws, a signed image release (liberatoria) must be obtained before using or sharing any image or content involving a minor. This form should explicitly outline the purpose, scope, and potential distribution of the content.
- **Prohibited Usage:** Images of children should never be used in any context that could compromise their dignity or exploit their vulnerabilities. This includes any form of inappropriate commercial use or visual content that could lead to the exposure of children to harm.

Promotion of Gender-neutral and Non-Stereotypical Narratives

- **Inclusive Language and Representation:** All content related to children should be free from gender stereotypes and ensure equal representation across all genders, races, and backgrounds. Gender-neutral language should be used wherever possible to avoid reinforcing outdated gender roles.
- **Diverse Storytelling:** Stories involving children should reflect a broad diversity of experiences, allowing children of all backgrounds to see themselves represented in a positive and empowering way. Content should avoid reinforcing traditional, narrow notions of gender and encourage children to explore and express their identities freely.
- **Education on Diversity:** Content should highlight the importance of respecting and embracing gender differences, and educate children on the value of equality and inclusivity.

No Depictions of Suffering or Harm to Children

- **Sensitive Subject Matter:** Images or content depicting physical, emotional, or psychological suffering of children are strictly prohibited unless the context is educational, corrective, or done in collaboration with experts in child welfare.
- **Context of Representation:** In the rare case that such content is shared for educational purposes, it should be presented in a way that is informative, appropriate, and done with the utmost care for the child's dignity and well-being.
- **Clear Warnings:** Any content that could potentially disturb or harm viewers should be

accompanied by clear warnings and advice on the nature of the content, ensuring parents or guardians are informed before exposure.

f) Training

ERI Provide regular safeguarding and protection training to all staff and volunteers with at least one mandatory training session /updating every 2 years. For specialistic personnel it could be implemented with more frequency (at least 1 per year) and it will be tailored to the personnel background, experience and role, particularly depending on the nature of the work being undertaken. ERI also offers specialized training for the DSL at least one session each year. The HR Responsible organizes and monitors the training providing and participation keeping records. All the personnel and collaborators will have access to online recorded training sessions and materials that they must acknowledge and that they can consult every time they need.

Project managers, educators, social workers and all operators provide resources for children with age-appropriate information about their rights, and how to stay safe at the beginning of their involvement in each project/service/action.

DLS Promoting a positive safeguarding culture across ERI.

ERI is committed to ensuring that child protection is not just a training topic but a core principle that guides all our activities and interactions. The protection culture is actively promoted at all levels, with management leading by example. All staff members are encouraged to raise any concerns and actively contribute to creating a safe environment for children.

4.7 Monitoring & Review

- DLS with the help of Focal Points regularly reviews and updates this policy, at least one review per year.
- Monitor the implementation of safeguarding procedures. DLS with Focal Point, quarterly meetings to monitor review.
- Seek feedback from staff, volunteers, and children. when necessary
- Learn from incidents and best practices.
- Annually, the DSL will provide a report to the board members regarding the effectiveness of the policy.

	ACTIVITY	WHEN	LEAD	PARTICIPANTS
1	REVIEWS AND UPDATE OF THE POLICY	AT LEAST ONE REVIEW PER YEAR	SAFEGUARDING LEAD (DSL)	FOCAL POINT (FP) AND DESIGNATED MEMBERS OF THE BOARD
2	MONITORING THE IMPLEMENTATION OF SAFEGUARDING PROCEDURES	QUARTERLY MEETINGS	DSL	FP
3	SEEK FEEDBACK	WHEN NECESSARY	WHOLE TEAM	STAFF, VOLUNTEERS, AND CHILDREN
4	LEAN FROM INCIDENTS AND BEST PRACTICES	ALWAYS	WHOLE TEAM	WHOLE TEAM
5	PROVIDING A REPORT REGARDING THE EFFECTIVENESS OF THE POLICY	ANNUALLY	DSL	DSL

4.8 Communication & Dissemination

DLS has to make this policy readily available to all staff, volunteers, partners, and children and their families. Make a child friendly version of the document and put both versions on-line.

DLS promotes a culture of open communication and reporting and organizes training moments in which she gives information about the CPP.

The Board includes information about reporting and complaints concerns on the foundations website.

ERI will provide an Italian and French version of the document in order to ensure its diffusion and comprehension within the contexts in which it works. In a long-term perspective, ERI will also provide Arab, Bengalese and Pakistani versions of the document to make the document understandable for its asylum seekers and migrant beneficiaries.

9. Contact Information

- **Designated Safeguarding Lead (DSL):** Mizar Forioso, f.mizar@eri.net.in, Legal and

Compliance Responsible

- **Local Child Protection Agency:** Guarantor for Children and Adolescents of the Piedmont Regional Council is the point of reference for the protection of minors' rights in Piedmont. Tel: 011 575 7303, Email: garante.infanzia@cr.piemonte.it, PEC: garante.infanzia@cert.cr.piemonte.it. You can also contact the Social Services of the City where the children reside.
- **Focal Points:**
 - Annamaria Brunetti b.anna@eri.net.in (ref. project based in Turin);
 - Andres Fuentes f-andres@eri.net.in (project based in Alessandria);
 - Iskender Forioso f.iskender@eri.net.in (project based in Catania-Albano laziale)
 - Mauro Valdinoci v.mauro@eri.net.in (project based in Gambia);
 - Franco Borgogno b. franco@eri.net.in (project based in Sassari)

Annex 1 - Declaration of commitment

I, the undersigned,

Declare I have received, read and understood the ERI' Child Safeguarding Policy and I commit to know and agree to work in accordance with it.

I understand that any failure to uphold the Code of Conduct may result in the termination of my engagement with ERI, or further disciplinary or judicial proceedings as mentioned above.

Furthermore, I declare that I have no criminal records regarding an offence towards a child (which I have not previously declared) and nor do I know of any reason why anyone would deem me unsuitable to work with children. ERI shall reserve the right to inform other institutions which may apply for professional references of the termination of contract for serious violation of the principles of the protection of children within the legislative framework applicable to the protection of information.

Date at

Signature

Annex 2 - Recognising abuse

Recognising abuse is complex, and there is no simple checklist which allows easy recognition. You can be alert to potential warning signs, but they should be assessed with care. Do not automatically assume that abuse is occurring. However, it is important not to dismiss your concerns or ignore any signs of abuse; these should be discussed with the FP and DSL as soon as possible to help decide the most appropriate action.

Possible signs of physical abuse:

- ☐ Bruises, burns, sprains, dislocations, bites, cuts
- ☐ Improbable excuses given to explain injuries
- ☐ Refusal to discuss injuries
- ☐ Withdrawal from physical contact
- ☐ Arms and legs kept covered in hot weather
- ☐ Unwillingness to participate in physical activities that may involve undressing, e.g. sports
- ☐ Fear of returning home or of parents being contacted
- ☐ Showing wariness or distrust of adults
- ☐ Self-destructive tendencies
- ☐ Being aggressive towards others
- ☐ Being very passive and compliant
- ☐ Chronic running away

Possible signs of neglect:

- ☐ Frequent hunger
- ☐ Taking scraps of food from bins or plates
- ☐ or stealing food
- ☐ Poor personal hygiene
- ☐ Constant tiredness
- ☐ Inappropriate clothing, e.g.
- ☐ summer clothes in winter
- ☐ Frequent lateness or non-attendance at
- ☐ school
- ☐ Untreated medical problems
- ☐ Low self-esteem
- ☐ Poor social relationships
- ☐ Compulsive stealing
- ☐ Drug or alcohol abuse

Possible signs of emotional abuse:

- ☐ Physical, cognitive or emotional development is
- ☐ delayed
- ☐ Highly anxious

- ☐ Showing delayed speech/ sudden speech disorder
- ☐ Fear of new situations
- ☐ Low self-esteem
- ☐ Inappropriate emotional responses to situations
- ☐ Extreme passivity or aggression
- ☐ Drug or alcohol abuse
- ☐ Chronic running away
- ☐ Compulsive stealing

Possible signs of sexual abuse:

- ☐ Age-inappropriate sexualised behaviour or highly sexualised language
- ☐ Bedwetting or soiling
- ☐ Anal or genital soreness
- ☐ Sleep problems
- ☐ Fear of being with adults
- ☐ Promiscuity
- ☐ Extreme risk-taking
- ☐ Risk-taking in adolescents

Possible 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 organisation's Code of Conduct/behaviour protocols
- ☐ Initiating private contact with a child, in person or by email or phone

Annex 3 - Internal Report Form

Child Protection Incident Report Form

Date of Report: _____

Name of Reporter: _____ (Optional)

Child's Name (if applicable): _____

Child's gender: _____

Child's age: _____

Child's address: _____

Child's parents/guardians: _____

Date of Incident: _____

Project/Service: _____

Type of Concern (select one):

- ☐ Abuse (Physical, Emotional, Sexual)
- ☐ Harassment/Bullying
- ☐ Inappropriate Content or Behavior
- ☐ Other (please specify): _____

Detailed Description of the Incident:

If the concern was shared by someone else, please state who and their relationship to the child: What happened? Give cause (how and why) if known - If you include personal observations, please make a distinction between what is a fact and what is opinion or hearsay (e.g. child's emotional state, visible injuries, etc.):

Was the incident:

- ☐ observed by you?
- ☐ suspected?
- ☐ disclosed by someone else?

Did the child/young person or another source say anything to you [if relevant], and how did you respond to them: [Do not lead the child. Record exact details.]

Action Taken (if any):

Has any treatment been given to the child? YES / NO

Treatment given by:

Taken to hospital: YES / NO

If yes, which hospital and how:

Were there any other children/people involved in the alleged incident? YES / NO

Are any other children at risk of harm? YES / NO

Preferred Follow-Up Method (email/phone): _____

Date_____

Signature_____

Note: Sent it to Focal point and DSL (in copy)