



Child protection policy

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1. PURPOSE

The purpose of the Child Protection Policy of “Centro Italiano per l’Apprendimento Permanente” [hereinafter, CIAPE] is the safety and protection of the child in the Organisation environment.¹ The protection of children in the broad sense is defined as the taking of measures to ensure the exercise of all children's rights as specified in the United Nations Convention on the Rights of the Child and in European and national legislation. Strictly speaking, the protection of children concerns their right not to be subjected to violence of any kind; abuse, neglect, abandonment and exploitation. This Policy focuses on child protection in the strict sense.

The protection of children in the organisation environment is an international educational policy priority due to the concern about cases of abuse and neglect of minors, i.e. violation of the human rights of the child, and the realization that sexual exploitation and abuse of children in particular has increased nationally and internationally due to the increasing use, both by children and by perpetrators, information and communication technology.²

The responsibility of adults associated with the organisation to protect students in need is professional, ethical and legal. The Child Protection Policy is based on three pillars: prevention, through the creation of a safe and positive organisation environment with a clear delimitation of staff-pupil relations, protection, through the establishment of policies and codes of conduct and good behaviour, and support for children who have suffered abuse.

The teaching and administrative staff of CIAPE has an obligation to report to the Management and/or Administration violations or suspected violations of these rules and recommendations. In case of indications of abuse or neglect of a minor, the Management and/or the Administration reports the incident to the competent authorities.

The Child Protection Policy is posted on the website of CIAPE, is available to both parents or guardians of students, as well as anyone interested. CIAPE organizes briefings of all teaching and administrative staff and targeted trainings annually, and ensures that recruitment procedures are aligned with international good practices.

Social welfare institutions of public and private law, which provide organized social care services for the protection of minors, including minors with disabilities, within the meaning of Article 9 of Law 4109/2013 (A' 16), Article 1 of Law 2345/1995 (A' 213) and Articles 1 and 2 of Law 4756/2020 (A' 235).

2. SCOPE

This Policy binds the teaching and administrative staff of CIAPE, any adult who works within the Organisation and/or interacts with children directly and unsupervised.

For the purposes of this Policy, "child" is defined, in addition to any person under the age of 18, as well as any student of CIAPE under the age of 18.

The public and private conduct of adults associated with the Organisation can either inspire as a positive role model, or harm other persons, especially minors, if inappropriate. Those who are bound by this Policy are responsible by both their public and private conduct for the safety and protection of the child.

The 'Organisation environment' also extends to organisation events and activities that take place outside the organisation premises or online.

Adults associated with the Organisation are responsible for maintaining the physical, emotional and sexual behavioural boundaries imposed by the principle of professionalism in the context of education. In particular, any conduct of a sexual nature directed at minors under their responsibility is prohibited. This constitutes abuse, exploitation and harassment of minors.

Inappropriate touching, rape, incest are forms of sexual abuse, and can take place at home, at organisation and in places providing care, entertainment, remedial teaching, etc. in children. Children are particularly vulnerable to sexual abuse, as adults can exercise power and control over them, and their access to reporting mechanisms is often limited.

3. RULES AND GUIDELINES OF CONDUCT FOR CHILD PROTECTION

The teaching and administrative staff of CIAPE and any adult working at the Organisation or participating in organisation activities must fulfil the duties and responsibilities established by law⁴ and must:

- I. treat everyone, especially children, with respect, patience, integrity, courtesy and understanding;
- II. maintain a supportive attitude of encouragement and acceptance and promote cooperation;
- III. is aware both of the sensitive position of adult persons interacting directly and unsupervised with children or young people, and of the vulnerability of children;
- IV. understands that the responsibility to maintain boundaries – physical, emotional and sexual behaviour – when interacting with children lies with adults;
- V. ensure that interaction with children takes place in public places or in the presence of colleagues or parents and guardians,
- VI. contributes to a safe environment for children in CIAPE,
- VII. Understands that touching/physical contact with another person can be misinterpreted and therefore assess, in his/her professional judgment, the appropriateness of expressing

interest, care, approval through physical contact and avoiding behaviours that may be perceived as inappropriate (e.g. tickling, kissing, pinching, caresses),⁵

VIII. participates in trainings/trainings organized by CIAPE on child protection issues,

Also:

- IX. is prohibited from seeking secret physical contact with children for his or her satisfaction or abusing his or her position of authority over them;
- X. must promptly report incidents that he/she believes could be misinterpreted and endanger children, the Organisation or his/her professional position and record/report any indications or suspicion of erotic feelings of a student towards a member of the teaching or administrative staff,
- XI. should always be ready to account for the way of physical contact with children in the context of organisation activities, as any physical contact may be subject to control;
- XII. If regular contact with an individual child or young person is required for educational purposes, such as in the case of a child with a disability, chronic illness or special educational needs, he/she should propose the drafting of a formally agreed individualized plan, with the participation and consent of the pupil's parents/guardians, justifying and specifying the needs for regular physical contact; the plan is subject to review at least annually;
- XIII. should, where the child is known to be or has been abused⁶, exercise particular care during physical contact, and if the child is particularly keen on touch or physical contact, discourage him by helping him understand the importance of personal space boundaries,
- XIV. is prohibited from using physical force to discipline or corporal punishment with the aim of causing pain or distress to the child;
- XV. must intervene when there is evidence and/or indications/suspicion of abuse⁷, harassment, neglect of a minor or inappropriate behaviour towards a child and report the incident following the procedures set out in this Policy (see below);
- XVI. must cooperate fully when requested by the Management and/or the Administration to investigate an incident of child abuse,
- XVII. must report incidents Address giving full details, stating whether he is a witness to the incident or the recipient of a report and whether there has been a discussion with the child; it is crucial to convey, as far as possible, the words used by the child himself,
- XVIII. must adhere to the principles of safety and transparency when communicating with children, as specified in the following prohibitions/recommendations:
 - 1. communication that goes beyond the scope of competence and is not related to the professional status of the adult person is prohibited;
 - 2. only organisation email addresses and internal electronic platforms used by the organisation (e.g. zoom, google Drive) must be used for communication. Online communication through social media accounts (hereinafter, social media) or messaging applications (see Regulation on the Proper Use of social media) is not permitted.
- XIX. is prohibited from touching or talking to a child in an inappropriate manner (e.g. by sexual insinuations);
- XX. is prohibited from physically or emotionally abusing children and young people with behaviours such as hitting the body and face, humiliation, mockery, threats, humiliation;

- XXI. is prohibited from smoking, under the influence of alcohol or using drugs when working and interacting with children or young people;
- XXII. is prohibited from accepting or giving personal gifts to children without the knowledge of their parents or guardians;
- XXIII. It is forbidden to use profanity in the presence of children.

4. PROCEDURE AND INCIDENT REPORTING POINTS

The Organisation Management and/or Administration is responsible for monitoring, evaluating the implementation and annual review of this Policy, assisted by the School's Child Protection Team (see below). Its responsibilities also include the preparation of an annual report on the number and nature of reports submitted to the Organisation Management and/or Administration, as well as the planning and conduct of staff briefings and targeted trainings.

The responsibility for reporting an incident lies with each adult associated with the School. In order to report incidents of violation of this Policy, it is required to fill in the Incident Report Form and submit it to the "Child Protection Officer".

The "Child Protection Officer": the natural person designated, in accordance with Article 5, in each unit of a Child Protection Body, who undertakes the collection and recording of reports of cases of child abuse, their transmission to the competent Public Prosecutor or to the nearest police authority or potentially to the Social Services of Local Authorities of the first degree, as well as the parallel briefing of the administration of the institution without delay.

5. ADULT MANAGEMENT GUIDELINES ASSOCIATED WITH THE PARTICIPANT REPORTING ORGANISATION

Adults associated with the Organisation have an obligation to be alert and respond both to reports or concerns of participants addressed to them, as well as to suspicions of child abuse. Specifically:

- i. They must acknowledge and not question the children's concerns, fill in the Incident Report Form, which is accessible on the website of CIAPE www.ciape.it and report the incident to the Management and/or the Administration by the end of the daily organisation program or, at the latest, within 24 hours. The concern may be due to pupils' behaviour, reputation, reference content made directly by the pupil himself or by an adult confidant, observation of behaviour by an adult person.
- ii. They must inform the Management and/or the Administration and submit the Incident Report Form before the end of the current organisation day.
- iii. They should manage incident reports by listening attentively, without interruptions and interventions, to the child's account of the incident, to ask the child to explain what happened and to describe the events.
- iv. They should reassure the child, be calm, not judge and show interest.
- v. They must inform the child that what is reported to them cannot be kept secret and that they are obliged to report the incident to the responsible members of the teaching and administrative staff who are trained to support it.

vi.They must ensure that the words with which the child described the incident are recorded as accurately as possible.

6. CHILD PROTECTION TEAM

The Child Protection Team of CIAPE consists of:

- Eleonora Perotti, eleonora@ciape.it
- Irene De Laurentiis, irene@ciape.it

7. SENSITIZATION AND INFORMATION OF THE ORGANISATION COMMUNITY

To raise awareness in the organisation community, CIAPE undertakes the organization of briefings, trainings and trainings on a regular basis for all groups of adult persons associated with CIAPE and interacting with children in the organisation environment. The aim of these initiatives is to define the behaviour towards children and to clarify the internal procedures for dealing with incidents of violation of the Policy on the one hand, but also to protect the quality of the relationship of trust that develops between students and the teaching and administrative staff of the School.

Awareness and information initiatives are addressed to:

- i.All adults who are present or regularly visit the Organisation premises, such as parents or guardians of students, who must be aware of the existence and content of the main policies concerning the delimitation of relations between students and teaching and administrative staff,
- ii.All teachers and persons who interact with students in the context of organisation activities, who must understand the Child Protection Policy, the types and indications of abuse, how to manage reports / disclosures of incidents of violation and discuss child protection issues with colleagues.
- iii.Members of the Child Protection Team, who are responsible for examining reports of serious incidents referred to them and should also know the procedures for managing personal data, files and information [GDPR], the framework for examining reports and working with students and their families, the types of abuse, the criteria for assessing the need to refer the incident for further investigation or for professional opinion regarding its management.
- iv.Under the care of the Management and the Administration, the external partners of the Organisation are aware of and sign this Policy before or when concluding a cooperation contract with the Organisation. In case of a violation of this Policy, the cooperation with the Organisation will end immediately, without any other obligation of the Organisation towards them.
- iv.Under the care of the Management and the Administration, candidates for recruitment to the Organisation for positions of both teaching and administrative staff, are informed and sign this Policy before or during their recruitment.
- v.With the care of the Management and the Administration, the employees of the Organisation are informed of this Policy with the diligence of their Directorates and Departments and accept it in writing.

Notes

1 See also Law 3727/2008 (Government Gazette 257/A/18-12-2008) entitled 'Ratification and implementation of the Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse, measures to improve living conditions and relieve congestion in detention facilities and other provisions.

2 See Law 3727/2008 (Preamble), see also the United Nations International Convention on the Rights of the Child (Article 3 (concept of best interests of the child), Article 12 (free expression of opinion on cases concerning the child, in particular the possibility of being heard in administrative and judicial cases concerning the child), Article 19 (protection against all forms of violence, insult or violence, physical or mental, abandonment or neglect, ill-treatment or exploitation, including sexual violence, while in the care of his/her parents or one of them, his/her legal representative(s) or any other person to whom he/she has been entrusted), Article 39 (State provision to facilitate the physical and psychological recovery and social reintegration of any child victim: any form of neglect, exploitation or abuse, torture or any other form of cruel, inhuman or degrading treatment or punishment or armed conflict)).

3 Directive 2011/93/EU aims to harmonise Member States with regard to minimum criminal sanctions for the various offences of sexual abuse. It provides for harsher penalties where offences are committed by persons in a position of trust in relation to particularly vulnerable children and in cases of coercion. In addition, this Directive is the main legal instrument governing child pornography.

4 Article 36, Chapter E, Government Gazette 1340/2002 - F.353.1/324/105657/D1/2002.

5 It should be noted that it is impractical and inappropriate to adopt a 'touchless' approach to the educational process. The appropriateness of touching or physical contact with children depends on the needs of the organisation activity, its duration, which must in any case be limited, the age, stage of development, gender, religious identity and other cultural characteristics, as well as the temperament of each child.

6 Signs that may support suspicion of child abuse are trauma that is not convincingly justified by parents or guardians, behavioural changes, in particular substance or alcohol use or sexual behaviour that puts the minor at risk, repeated unjustified absences from school, psychological problems such as excessive anxiety or depression, the assignment of family responsibilities disproportionate to the child's age, the use of sexually suggestive language or material, including online material, deemed inappropriate for the child's age, non-communication of parents or guardians with the organisation environment, psychological problems of parents or guardians, such as depression, substance use by parents or guardians, and domestic violence.

7 Signs of abuse of concern may include a child's behaviour or behaviour change, a rumour, specific report by the child or trusted adult, or adult conduct that violates the rules and guidelines of this Policy.