

CHILD PROTECTION POLICY

INTRODUCTION

The "Associazione Nazionale di Famiglie e Persone con Disabilità intellettive e Disturbi del neurosviluppo" (National Association of Families and People with Intellectual Disabilities and Neurodevelopmental Disorders), a Third Sector Entity that carries out activities of general interest, from this moment only "Anffas Nazionale," works to build a world in which people with intellectual disabilities and neurodevelopmental disorders, and their families can see their rights respected and made fully enforceable.

Children and adolescents, who are a vital part of the association, may be in a dual condition of vulnerability as minors and as people with disabilities.

With this document, Anffas Nazionale is committed to protecting and promoting the rights of children and adolescents starting with those involved in the initiatives supported by the organization.

Anffas Nazionale wants to be a safe organization for children with and without disabilities, that is, an organization that respects, protects and values them, welcomes their aspirations, needs, ideas, opinions and listens to them, preventing the risk of discrimination, violence and abuse even from those who are in a position of responsibility for them, thus adopting a preventive and participatory approach in the protection of children and adolescents.

PURPOSE

The purpose of this Policy is to promote and guarantee the right of children to protection from all forms of discrimination, mistreatment, neglect, exploitation, violence and abuse. The Policy defines the procedures to which Anffas Nazionale adheres in order to increase its ability to manage and reduce the risks of mistreatment or abuse in the implementation of the organization's activities.

The Policy is necessary to protect:

1. **children** (boys, girls, and adolescents) with and without disabilities, to minimize the risks to which they are exposed;

2. the **staff** of Anffas Nazionale and, through it, all staff, operators and associates working within the member organizations of the Anffas network, who need to know how to behave and how to handle any concerns about their safety;
3. the **organization** itself, reducing the risk of unfounded accusations and protecting its image.

OBJECTIVES

The organization is committed to protecting children by taking the following measures:

Awareness: the organization ensures that all its members, including staff members, volunteers, members of Associative Bodies, member organizations are aware of the realities of child abuse, maltreatment and exploitation and their consequences.

Prevention: the organization's goals include reducing risk through encouraging good practices, creating a safe environment, and supporting the participation of children/youth by ensuring the creation of safe environments for children/youth in all aspects of the organization's activities.

Reporting: the organization ensures that all persons involved in the organization's projects or other activities are aware of the procedures to be applied and to report any potential risk of violence against/to children.

Response: Anffas Nazionale is committed to ensuring effective intervention in response to any report of abuse by supporting, protecting and safeguarding the child(ren) involved.

LEGAL REFERENCES

- ✓ Universal Declaration of Human Rights (1948)
- ✓ Convention on the Rights of the Child (CRC)
- ✓ Convention on the Rights of Persons with Disabilities (CRPD):
- ✓ Council of Europe Convention for the Protection of Children against Sexual Exploitation and Sexual Abuse, Lanzarote Convention, April 25, 2007;
- ✓ Italian national legislation on the protection of children;
- ✓ European Data Protection Regulation (EU) 2016/679 ("GDPR").
- ✓ Anffas Code of Quality and Self-control (henceforth "CQA")

GLOSSARY

The following are definitions taken into account in the application of this Policy; terminology used by most International Agencies and other organizations concerned with child protection is used.

Minor/Child: any person under the age of eighteen (18) years in accordance with the definition of the Convention on the Rights of the Child and Adolescent.

Child protection: prevention of and response to harmful events, abuse, neglect, exploitation, and violence against/against children where they occur.

Child abuse: any act that can cause physical or psychological harm to a child, directly or indirectly, or damage the child's prospects for safe and healthy development into adulthood; forms of abuse include physical violence, emotional violence, neglect and negligent treatment, sexual exploitation or abuse.

Physical violence: the intentional use of physical force on the child/children, which causes or has a high likelihood of causing injury, death, malformation or deprivation.

Psychological Violence: any form of verbal or emotional violence, psychological maltreatment such as to frighten the child/children or cause them to experience the feeling that they are unloved, unwanted, worthless, or that their needs do not matter.

Neglect: Conduct by omission, through superficiality, carelessness, inattention, forgetfulness, overlooking or listlessness. May relate to failure to protect the child/children from risks to their physical, emotional and psychological safety.

Sexual abuse or exploitation: any sexual activity in which a child is obliged to take part and the purposes of which may include, but are not limited to, sex trade, acquisition of sexually themed images or videos, and aiding and abetting the prostitution of children and adolescents.

Direct contact: means any form of contact that may result from meeting a child/children in person.

Indirect contact: means interaction with a child/children through telephone, social, web platforms and other virtual channels, or interaction even through an interposed person, as well as the handling or processing of personal data, photos and/or stories of children.

CHILD PROTECTION OFFICER (CPO)

The Legal Representative of Anffas National is appointed as the Child Protection Officer.

If a worker has concerns about the safety of children, contact him. He will assume the following responsibilities:

- Ensure that this Policy is put into practice;
- Be the first point of contact for child protection issues;
- Keep a record of all reports of possible risks of maltreatment/abuse/violence or other situations that undermine the safety of the child(ren);
- Bring any child protection issues to the attention of the Executive Council and contact the Local Authority if necessary;
- Ensure that everyone involved in the organization is aware of the identity of the Child Protection Officer.

The policy will be reviewed annually to ensure that it is meeting its objectives.

PROCEDURES AWARENESS AND PREVENTION

Awareness

Anffas Nazionale ensures wide dissemination to the Policy. Dissemination shall necessarily include Anffas Nazionale staff, its representatives, staff, administrators, operators, volunteers of member organizations, partner organizations, and, in particular, children, adolescents and their caregivers.

Dissemination is managed to ensure that the Policy is fully understood; this may include the use of translations in Easy-to-Read language, translations into different languages, and the production of child-friendly materials.

Privacy

Involvement of children and adolescents for purposes pertaining to marketing, communication/media and advocacy activities should always be done with informed consent and should not cause exploitation or worsening of their conditions, or those of their family members/caregivers, and increase their vulnerability. It is desirable, where possible, to avoid their identification, particularly by juxtaposing personal details, location, and image.

Staff Recruitment

Recruitment and selection of staff and other collaborators must reflect the commitment of to the protection of children with and without disabilities, ensuring that communications, controls and procedures are in place consistent with this commitment. Successful applicants are alerted to the binding nature of this Policy, the related procedure, the CQA, and the fact that these apply to both their professional and private lives.

The initial selection is structured in a interview, after evaluation of the curriculum vitae and qualifications possessed and against the acquisition of specific references from previous contexts, indicated by the candidate in the curriculum vitae and in the communications of self-application and/or first selection procedure. The interview is always conducted by a top figure and addressed to learn about skills, experience, references and aptitude in addition to a sharing of Anffas' unwavering principles.

The selected profile, in the first phase, works alongside experienced collaborators for an agreed period and is placed in contexts that can screen their approach and competence, compliance with the professional and ethical needs required.

The selected profile, after a phase of accompaniment/coaching, is included in the training plans and consequently and/or paralleled by job placement.

Training

Staff training: Anffas Nazionale promotes training on the issues of abuse and maltreatment according to the types of projects and initiatives activated, internally and externally, promoting and raising awareness of the issues of Policy, in local, regional, national dimensions.

Personnel working in contact with minors must receive specific training on issues related to mistreatment, harassment and abuse, possible risks and ways of prevention, as well as the behaviors to be implemented and the boundaries within which to keep when working in contact with minors.

All Anffas Nazionale staff receive training on the child protection procedures in this Policy and the CQA.

Children's training: The Policy must be shared with the minors who are the recipients of the organization's interventions in a way that is understandable to them, taking into account that the minors afferent to the activities managed by the Anffas network member organizations are mainly minors with intellectual disabilities and neurodevelopmental disorders that are often highly complex. Therefore, in addition to putting in place the necessary arrangements, family members and caregivers such as facilitators should be involved in this process.

Safety of minors

All activities carried out by the association, its member organizations and any other entities with which Anffas Nazionale collaborates must be conducted in such a way as to ensure that the rights and safety of and for minors are protected.

All personnel involved must follow the following rules:

1. Ensure that the area used for activities is fit for purpose and that any risk of physical harm is minimized.
2. Ensure that all operators, assistants, and volunteers know
 - a. What the risks are for the child(ren);
 - b. Who to contact in case of emergency;
 - c. What procedures to take if a child/children are suspected of being unsafe;
 - d. Where the first aid kit is located;
 - e. Who is responsible for first aid and how to record incidents;
 - f. Who is the Child Protection Officer.
3. Do not let a minor go home without an adult unless the parent has provided relative authorization.
4. Do not let a minor go home with any adult other than his/her parent/guardian/responsible person, unless he/she has provided relative authorization.
5. Prevent all conditions in which the minor may even potentially place him/herself in a dangerous condition or cause harm to others, including in relation to his/her own functioning and disabling condition.

REPORTING

In order to ensure the right of the child(ren) to protection, it is essential to provide a simple and transparent procedure for reporting any suspicions of abuse. To this end, a Child Protection Officer (CPO) is identified and formally assigned the responsibility of handling any reports of child abuse.

The reporting procedure must be clear, easily accessible and ensure that the best interests of the child/children are respected. Confidentiality must also be ensured: the name of the persons who made the report, the subject of the report, and the identity of the person accused will not be made public, unless the case comes before a judge and witnesses are required to be heard.

Reports regarding cases of abuse, sexual violence or inappropriate behavior by staff should be reported to the personal e-mail address of the designated person in charge roberto.speziale@anffas.net or to +39 063212391. Reports will be handled anonymously. Intake will be ensured by the designated Officer.

Who can make a report? The minor, a parent, a family member, a staff member, a volunteer, a member of the Associative Bodies, the member organizations of the Anffas network, partners or external collaborators.

Any reports from minors may also be made through informal channels through the referring adults who should take charge of the report.

In the event that a child confides a situation of prejudice and/or abuse in the definitions in this Policy, the following must be respected:

- respond to a principle of confidentiality and utmost seriousness and consideration of what is received;
- a professional, if not directly involved, must be called urgently in order to assist the child/children in exposing the facts;
- his/her coordinator, supervisor or directly the Child Protection Officer must be informed immediately;
- the child must be listened to in respect of his/her own time, developmental age, context of reference, cognitive, linguistic, relational, social skills;
- the child must be informed of the use of the testimony in the next steps.

Cosa può essere segnalato? Qualsiasi sospetto di comportamenti lesivi o preoccupazione per la sicurezza della protezione del/della minore. Deve essere segnalata inoltre qualsiasi violazione della presente Policy.

What can be reported? Any suspicion of harmful behavior or concern for the safety of the protection of the child(ren). Any violation of this Policy must also be reported.

A report is made in the following situations:

- detection and assessment of any abuse, whether suspected or confirmed;
- where an employee directly witnesses and/or suspects a potential bias situation;
- where an employee receives a report in turn from external partners and collaborators;
- if an employee receives, directly or indirectly, direct testimony, narrative from a child/children.

Anffas Nazionale, in synergy with the member organizations involved in the event, commits and engages its staff in:

- protect the minor(s) and provide all the support they need to the extent of their competence, facilitating support/support processes;
- protect and support the child/children's context of reference when not directly involved;
- protect the person who discovered the abuse;
- avoid any contact between the person accused of the abuse and children involved;
- take appropriate action based on the decision of the competent authorities.

Directions in case of reporting by the child

What to do

- Listen to the child/children.
- Take everything that is said seriously and help the child to trust his/her own feelings.
- Do not promise to keep secrets before knowing what they are, but always let the child know if and why they will be told.
- Take notes immediately after the event, trying to write down exactly what the child said.
- Avoid making assumptions or guesses.
- It is not the practitioner's job to investigate any allegations. Any revelation by a child should be reported to the Child Protection Officer.
- Maintain confidentiality.

What NOT to do

- Practitioners/volunteers should not initiate investigations on their own.
- Do not discuss the matter with anyone except the appropriate people.
- Do not speculate or make assumptions.
- Do not decide not to act on the basis of one's own opinions or personal connections.

Things to say

- "What you are telling me is very important."
- "It's not your fault."
- "I'm sorry this happened or is happening."
- "You were right to tell someone."
- "What you are telling me should not happen and I will find the best way to help you."

Things NOT to say

- Don't ask leading questions
- Don't say "Are you sure?"
- Don't show your emotions, such as shock or disbelief.
- Don't make false promises
-

DETAILED PROCEDURE WHEN REPORTING ABUSE

REPORT

1. Receipt of Report:

Any staff member, volunteer, child or family who suspects abuse must report it immediately to the specially designated Child Protection Officer (CPO). The report may be made in person, by phone, by e-mail, or by using a report form available at the association office or attached to this policy

2. Confirmation of Receipt:

The CPO must acknowledge receipt of the report within 24 hours, assuring the person who reported that the situation will be taken seriously and treated with the utmost confidentiality.

DOCUMENTATION

1. Collection of Information:

The CPO will collect all relevant information regarding the report, including specific details of the suspected abuse, the identity of the child involved, the identity of the accused person (if known), and any available witnesses or evidence.

2. Record of Reports:

All reports must be documented in an abuse report register, maintained in a confidential and secure form. This register must include the date and time of the report, details gathered, and actions taken.

INTERNAL INVESTIGATION

1. Preliminary Assessment:

The CPO, together with a designated small internal committee, will conduct a preliminary assessment of the report within 48 hours of receipt to ascertain the merits of the report and determine the seriousness of the allegation.

2. In-Depth Investigation:

If the preliminary assessment suggests that the report is well-founded, the CPO will proceed with a thorough investigation, including interviews with the child (if appropriate), the accused person, any witnesses, and examination of any available physical or documentary evidence.

3. Temporary Measures:

During the investigation, temporary measures may be taken to protect the child, such as temporary suspension of the accused person from association activities and additional supervision of the child.

INVOLVEMENT OF AUTHORITIES

1. Reporting to Authorities:

If the internal investigation confirms or strongly suggests abuse, the CPO must report the case to the appropriate authorities (social services, police) within 24 hours of the conclusion of the internal investigation.

2. Collaboration with Authorities:

Anffas will fully cooperate with the authorities, providing all information gathered and facilitating any further investigation or intervention needed.

VICTIM SUPPORT

1. Immediate Support:

Anffas will offer immediate support to the child and family involved, ensuring that the child receives necessary medical care and psychological support.

2. Counseling Services:

The association will provide access to professional counseling services for the child and family, working with psychologists, social workers, and other experts to ensure adequate and ongoing support.

3. Personalized Safety Plan:

Together with the child and his or her family, Anffas Nazionale will develop a personalized safety plan to ensure that the child is protected from further abuse and receives the support necessary for recovery.

MONITORING AND REVIEW

1. Ongoing Monitoring:

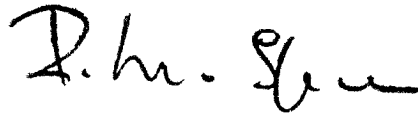
The case will be monitored regularly to ensure that the safety and support plan is effective and to make any necessary adjustments.

2. Review of the Procedure:

After the conclusion of each case, the CPO and internal committee will conduct a review of the procedure followed to identify any areas for improvement and update the Policy if necessary.

Roberto Speciale

President of Anffas Nazionale ETS-APS

A handwritten signature in black ink, appearing to read "R. Speciale".

Rome, August 1, 2024

ANNEX

REPORT FORM FOR THE PROTECTION OF CHILDREN FROM THE RISK OF ABUSE

Please note: All reports will be treated with the utmost confidentiality and will be investigated appropriately to ensure the safety and well-being of the child(ren) involved.

1. Reporting Person's Information

- First and Last Name: _____
- Role (e.g., parent, teacher, volunteer, etc.): _____
- Phone Number: _____
- E-mail Address: _____

2. Information about the Minor

- First and Last Name: _____
- Age: _____
- Gender: Male Female Other
- Address: _____
- Parent or Legal Guardian Contacts: _____

3. Details of the Report

- Date and Time of the Alleged Risk: _____
- Location of the Alleged Risk: _____
- Type of Risk (describe in detail): Physical Sexual Emotional/Psychological Neglect Other (specify): _____
- Detailed Description of Risk:

- Have you noticed any physical or behavioral signs that indicate a risk? Yes No.

If yes, please describe: _____

4. Information about the Reported Person or Situation (if known)

- Full Name: _____
- Relationship to the Minor: _____
- Role (e.g., teacher, coach, family member, etc.): _____
- Physical Description or Situation: _____

5. Witnesses or any other persons present

- First and Last Name: _____

- Contact information: _____

- Description of the Role and Remarks of the Witness:

6. Immediate Actions Taken (if any).

- Did you take immediate actions to protect the child? Yes No

If yes, please describe: _____

7. Additional Information

- Any other relevant information:

8. Signature of the reporter

- Signature: _____

- Date: _____