



# CHILD PROTECTION POLICY

GUIDELINES, PRINCIPLES AND PROCEDURES FOR THE PROTECTION  
OF MINORS



## INTRODUCTION

The Social Cooperative Liberitutti is committed to the prevention of child abuse and acts with respect for the safety of children and adolescents taking part in activities that develop on the territory.

Our organization is aware that violence and abuses are a serious and widespread globally problem which deserves to be tackled proactively. Liberitutti is committed in taking decisions and taking actions to protect the interests of minors. The drafting of this document and these guidelines testify, in fact, our commitment to protect minors who frequent our structures and are involved in the initiatives and projects of our organization.

Liberitutti firmly believes in the importance of protecting, defending and disseminating children's rights, including being protected from all forms of violence, physical and verbal abuse or exploitation as provided for in *the UN Convention on the Rights of Children and Adolescence under the Council of Europe Convention on the Protection of Children against Exploitation and Sexual Abuse* (Lanzarote Convention, 2007).

All individuals, who have not yet reached the age of 18, are defined as "minors". Liberitutti is committed to ensuring the protection of the rights of minors who come into contact with employees, volunteers, trainees and external collaborators of the organization.

## PRINCIPLES, VALUES AND COMMITMENTS

Employees, trainees, volunteers and collaborators undertake to respect the following values and principles:

1. We recognise the value of each individual, we do not tolerate any form of discrimination based in particular on age, race, skin colour, ethnic or social origin, sex, genetic characteristics, language, religion or belief, political or any other opinion, belonging to a national minority, gender identity or sexual orientation, heritage, birth or disability.
2. We give every child the right to protection from any kind of violence or abuse. We are committed to taking every action to prevent the perpetration of such violence against minors and to denounce any abuse.
3. The interest of children is considered a priority among the cooperative's protection actions.



4. Liberitutti supports the right of children to be heard and to share their views and promotes this approach in its activities.
5. We are committed to providing all necessary support to employees, trainees, volunteers and collaborators who work closely with minors.
6. We are committed to informing staff, including trainees, volunteers and collaborators, of the safeguards put in place to prevent the potential risks of child abuse and exploitation.

### *CODE OF CONDUCT FOR THE PROTECTION OF MINORS*

The staff, volunteers, trainees and collaborators of Liberitutti undertake to enforce the following points:

1. take actions in cases of physical or psychological violence against children;
2. do not adversely affect the child's harmonious and socio-relational development, especially never abusing psychologically;
3. do not perpetuate negative behaviors that may be an example to the child;
4. to intervene in the event of sexual abuse of all minors (under 18 years old) regardless of the definition of the age of majority or the modalities of consent legally recognised in the different countries. Incorrect belief in the age of a child is not an acceptable defense;
5. Intervene where there are interpersonal relationships with children that can be considered as exploitation, mistreatment or abuse;
6. Do not act in such a way that they may harm or put the child at risk;
7. Do not use offensive or damaging language giving inappropriate advice;
8. Avoid inappropriate or sexually provoking behavior;
9. Avoid establishing or maintaining interpersonal contacts by means of online (e-mail, chat, social networks, etc.) outside the approved activities and/or related to the project. Communication must always be professional and never harmful to the child;
10. Never allow one or more minors with whom you work or have worked to sleep in your own domain/residence except in exceptional cases previously authorized by the consent of the parents or guardians and scrupulously following the safety procedures for the protection of the child.
11. Never allow to sleep in the same room or in the same bed as a minor with whom you work.



12. Never lend money, goods or other utility to a minor outside the parameters and purposes established by the planned activities or without parents or guardians being aware of it;
13. Do not tolerate or participate in any behavior on children who are illegal, injurious or who endanger their safety;
14. Never discriminate or treat differently or favor some minors by excluding others.

The above list is not exhaustive or exclusive. The basic principle pursued by our cooperative remains to avoid actions or behaviours that may be inappropriate or potentially abusive towards children.

It is also essential that staff, volunteers and external collaborators in case of contact with minors:

1. must be vigilant in identifying situations posing a risk to minors and can adequately report them to the competent person;
2. report any suspicion or certainty of potential abuse or mistreatment of a child, as established by this Policy;
3. organise work and workplaces to minimise risks;
4. are always under control in carrying out activities with minors;
5. ensure the dissemination and maintenance of a culture of openness to allow staff, volunteers, minors and caregivers to easily raise and discuss all kinds of topics and concerns;
6. ensure that they maintain appropriate behaviour towards children with whom they work;
7. make the relational dynamics with children clear, always protecting them and without acting against them or in a way that affects them negatively;
8. enhance the skills and competences of children, helping them to understand their rights, which are the acceptable and unacceptable behavior and what to do if a problem arises;
9. maintain a high professional and personal profile at all times;
10. respect and protect the rights of children, always treating them in a fair, honest, just way with dignity and respect;
11. Encourage the participation of the child in all those actions aimed at supporting the development of self-protection capacities.



## *CODE OF CONDUCT FOR THE PROTECTION OF MINORS' PRIVACY*

The Code of Conduct for the protection of the privacy of minors sets out the procedures to be followed for the collection and processing of personal data of minors in accordance with the main European regulations<sup>1</sup>.

For the purpose of collecting data of minors and also for communication activities related to cooperative projects, it is necessary to have the written consent of their parents or guardians. The employees of Liberitutti will be responsible for collecting the personal data of minors be able to rely on the privacy policy of the organization pursuant to the Personal Data Protection (EU) 2016/679.

The cooperative undertakes to:

1. not sharing information provided by the entities benefiting from its activities and services with third parties;
2. maintain confidentiality through the employees in charge of personnel management of the subjects involved in the Cooperative's research activities;
3. all publications produced by the cooperative and its partners must comply with the guidelines on the protection of children's rights;
4. the dissemination of information and photos containing minors who have taken part in Cooperative activities will only be authorised with the parent's or their guardians written consent. The principle applied in this case will follow Article 3. of the UN Convention on the Rights of Children and Adolescence. The principle remains valid both for printed and digital publications and for information or images concerning minors with whom the organization has come into contact.
5. The collection of data and/or images of minors may only be authorised if they are intended and/or strictly necessary for the implementation of the organization's activities or projects. Such information may only be used for the purposes for which it was provided and for a period limited to the duration of the project. It is the task of the employees of the organization to obtain the permission of the parents or guardians of the child, as well as the consent of the child itself, as provided for by the law in force. Captured images and data will be stored on Liberitutti internal servers accessible only to staff members with the appropriate credentials who have already signed the code of ethics and code of conduct. The data saved on the server will be accessible only with password and protected from external attacks.

---

<sup>1</sup> UE 2016/679



6. Liberitutti prepares special forms for informed consent for parents and minors. For the publication of photos and images is always necessary the authorization that can be revoked at any time according to art. 7 D.lgs. in 196/2003. The reference law on consent for the privacy of minors is the General Regulation on the protection of personal data, GDPR, approved by the European Union, with particular reference to Italian law, art.2-quinquies of Legislative Decree no. 101/2018 states that the age limit for valid consent may not be less than 14 years.

### *ADDITIONAL CRITERIA FOR STAFF SELECTION AND RECRUITMENT*

The recruitment and selection of employees, other staff, trainees or volunteers should reflect the commitment of Liberitutti to protect children, girls and adolescents, ensuring that communications are adopted, controls and procedures to exclude anyone who is unfit to work with minors.

For this reason, we have established and developed specific procedures to be applied during the recruitment and selection of employees, collaborators, trainees and volunteers who provide in the order:

1. receipt of curriculum vitae and interview;
2. careful checking of references, verification of pending loads, tax and social security;
3. subscribe to this Policy.

#### *In the course of the interview:*

the candidate shall hold an interview with at least two staff members in order to ensure transparency rules. During the interview the candidate will be informed of the binding nature of this Policy, the related procedures and the code of conduct that will be required to be applied to the professional and private life of the candidate.

#### *Check of the references:*

Liberitutti reserves the right to use the following procedures for the control of references provided by potential employees: contact the person indicated in the curriculum by prospective employees and volunteers; contact former employers and companies in order to explore the possibility that the applicant/candidate can be hired again, as well as inform themselves about their ability to work in contact with minors; verify the content of the reference letters by telephone or by other means; conduct online searches on candidate and identify any signs that make it unsuitable





to work with minors (Google searches, national databases on sexual predators, social networks).

*Signing of the contract:*

- a) The staff and volunteers of Liberitutti s.c.s at the time of the signing of a contract of employment of any kind or the definition of their voluntary assignment must receive, fully understand and sign this Policy, which includes the Code of Conduct and the General Procedure, including any contact details for alerts.
- b) The signing of this Policy will be archived as an attachment to the employment contract. All employees who work or could work in contact with minors will be required to present the Criminal Certificate and pending loads pursuant to the President of the Republic of 14 November 2002 n. 313 art. 25 bis.

All staff, volunteers, trainees and collaborators are invited to:

1. promote an open listening environment on issues relating to the protection of children, to facilitate the exposure of issues and/or reports of alleged abuse of children;
2. ensure the sharing and dissemination of a common sense of responsibility among staff members on children and adolescent protection;
3. encourage children to raise problems and concerns;
4. make parents or children's guardians aware of children's rights, what is acceptable or unacceptable;
5. be clear to parents and guardians about the professional attitude they can expect from Liberitutti staff and clarify in detail what can be done in case of problems related to child abuse.

Any alleged breach of the Policy must be reported and investigated in accordance with the Policy itself and its General Procedure. Any violation of the Policy constitutes a disciplinary offence that can be sanctioned, in the most serious cases, also by the withdrawal from the employment contract.

*CONTINUING TRAINING ON CHILDREN'S RIGHTS*

LIBERITUTTI - S.C.S  
VIA LULLI 8/7  
10148 TORINO  
P IVA 07820120017  
WWW.COOPLIBERITUTTI.IT

T | +39 011 2207819  
F | +39 011 2261342  
E | LIBERITUTTI@COOPLIBERITUTTI.IT  
PEC | LIBERITUTTISC@PEC.IT  
SKYPE | LIBERITUTTI COOP

ISCRIZIONE ALBO NAZIONALE  
DELLE COOPERATIVE A161801  
R.E.A. N. TO 923897  
ACCREDITAMENTO QUALITÀ N. LIBE5814Q1760  
ADERENTE CGM



The staff, trainees and volunteers of the cooperative must be supported in the development of skills, knowledge and experience on the protection of minors appropriate to their role in the organisation.

Within the first 12 months from the date of recruitment, workers must attend online training seminars on the rights of children and adolescents and on measures to prevent child abuse. These educational activities will be aimed at staff who will work in direct or indirect contact with minors and will focus on: *legislation on children's rights (United Nations Convention, Lanzarote Convention, national regulations) techniques for communicating effectively with children, measures for preventing, detecting, documenting and denouncing child sexual abuse, procedures for protecting privacy.*

These online training seminars will be based on existing teaching materials and will be developed on the basis of programs already developed by Liberitutti and the most important authorities in the field of child protection such as the UN and the Child and Child Protection Authority Italian.

Regular supervision will also be provided to support staff involved in actions with children to protect the psychophysical well-being of workers. The basic information of the Policy, Code of Conduct and General Procedure should be included in the initial and continuing training of staff. The employees of the cooperative are also guaranteed the possibility to report any child abuse and be supported in the application of the policy following the procedure of complaint to the competent bodies.

### *GENERAL PROCEDURE FOR THE PROTECTION OF MINORS*

Liberitutti defines the General Procedure for the reporting and management of a suspected mistreatment, abuse or exploitation of girls, children or adolescents. In particular, it establishes that there is a contact person for the application of this Policy always present in the cooperative. The contact person is supported by the pedagogical manager and the human resources manager of the cooperative and ensures that a mapping of child protection facilities and services is carried out and disseminated among workers in the specific places where Liberitutti operates and works. Liberitutti will provide information on policies, procedures and practices, contact persons and services in all places of work.

The contact person draws up and guarantees, on the basis of the information provided by the mapping, the dissemination among workers of procedures to manage the reporting of possible cases of abuse and subsequent actions to be taken. The





violations of the Policy must all be reported to the contact person as guarantor of the implementation of this document.

### *RELATIONS WITH THIRD PARTIES*

Liberitutti guarantees collaboration and partnerships with third parties who can respect and pursue the restrictive rules adopted by the Cooperative on the protection of minors. The Cooperative reserves the right to conduct research on plans for the protection of minors and on the initiatives promoted in this sense by partner organizations.

Therefore, Liberitutti will not tolerate the dissemination of potential contents unsuitable for the use of minors.

All agreements between the cooperative and third parties such as partner organizations and third sector entities must include clauses of this Policy.

Consequently, all Liberitutti partners should view this Policy through official Cooperative channels and written agreements. Agreements with entities identified as partners must clearly highlight agreed procedures for reporting and investigating cases of Policy violations. Partners commit to:

1. comply with this Policy in all its forms and know how to proceed in case of need to report an alleged abuse of children;
2. comply with the Codes of Conduct, included in this Policy.

Turin, January 15th 2020

**Liberitutti s.c.s.**  
Via Lulli, 8/7  
10148 TORINO  
Partita IVA 07820120017

