

CHILD PROTECTION POLICY AND SELF-REGULATORY PROCEDURES

PURPOSE AND AIM OF THE POLICY

Legacoop Emilia-Romagna is the association representing on the regional territory the member cooperatives of Legacoop Nazionale. The Association conforms its conduct to the principles valid for the entire Cooperative Movement referring to the International Cooperative Alliance, the Statute and the principles contained in the Charter of Guiding Values of Legacoop Nazionale. Legacoop Emilia-Romagna is therefore committed to interpreting the inspiring principles and founding values of cooperation in all relations within the organisation, with cooperatives, associated bodies and towards the outside world.

The people of Legacoop inspire behaviour among themselves and towards others to respect the rights of people and the communities in which they live.

In fulfilling its associative mission, Legacoop Emilia-Romagna, on some occasions, carries out activities that directly or indirectly involve minors, particularly students.

By way of example, minors may come into contact with Legacoop Emilia-Romagna in the context of:

- training activities carried out at schools of all levels;
- school-to-work program or mentoring projects;
- events organised by Legacoop Emilia-Romagna or in collaboration with other organisations at Legacoop premises or elsewhere.

Legacoop Emilia-Romagna seeks to maintain the highest possible standards to fulfil its social, moral and legal responsibilities in order to protect and safeguard the welfare of minors who may come into contact with the association's activities.

The purpose of this Policy is to:

- guide the association, its staff, representatives and external consultants in promoting the welfare of children and protecting them from possible abuse in every aspect of the association's activities and beyond.
- ensure that children's rights are recognised and respected and that children are protected from all forms of violence and abuse.
- support people in identifying behavioural standards and procedures to create and promote a safe environment for children.

Therefore, Legacoop Emilia-Romagna implements the following actions:

- establishing rules of conduct relating to activities with minors;
- performing an adequate risk assessment of these activities;
- reporting and managing problems that arise while working with children

The Policy was developed with reference to the Keeping Children Safe Child Safeguarding Standards.

Legacoop Emilia-Romagna will ensure the effective dissemination of this policy inside and outside the association and provide adequate support for its correct implementation.

The staff of Legacoop Emilia-Romagna is required to report any known or suspected problem or risk concerning the welfare of a child within the scope of the activities carried out by the association, according to the procedures set out in this document.

This policy applies to:

- The staff, consultants and representatives of Legacoop Emilia-Romagna;
- Partners, suppliers, contractors or those who otherwise have a contractual relationship with Legacoop Emilia-Romagna unless it has been agreed that the partner applies its own child protection policy;
- Journalists, photographers and any other visitors in any capacity.

POLICY STATEMENT

Legacoop Emilia-Romagna embraces the principles contained in the Italian Constitution and strongly condemns any form of discrimination based on age, race, skin colour or ethnic or social origin, sex, language, religion or belief, political or any other opinion, membership of a minority, gender identity or sexual orientation, wealth, birth or disability.

Legacoop Emilia-Romagna supports the UN Convention on the Rights of the Child (CRC), ratified by Italy on 27 May 1991 with law no. 176, and wants to provide a safe haven for minors who may have experienced abuse or neglect in any aspect of their lives.

Legacoop Emilia-Romagna recognises that all children have the right to develop emotionally, intellectually and physically and have an equal right to protection from any form of violence, abuse or neglect.

Legacoop Emilia-Romagna wants to be for all the minors it comes into contact with a safe and protected environment for their growth and development. The right of every minor to protection from any kind of violence or abuse will be recognised and all actions will be taken to prevent inappropriate or potentially abusive behaviour towards minors.

Therefore, the staff, consultants and representatives of Legacoop Emilia-Romagna and all those to whom this Policy applies have a professional and ethical obligation to pay attention to signs of neglect and abuse of minors and an obligation to report any suspicion of possible violence or abuse.

COMMITMENTS

Prevention

Legacoop Emilia-Romagna is committed to creating and maintaining an environment in which the well-being of minors is promoted in every aspect of its activities.

Awareness-raising

It is essential that all Legacoop Emilia-Romagna staff, its representatives as well as collaborators are aware of the child protection policy and are clear on when

to report a suspicion of possible abuse and what action to take.

Training

All personnel must read and acknowledge this Policy. Basic information on the Policy and the Code of Ethics will be included in the initial staff training.

Legacoop Emilia-Romagna undertakes to provide assistance and support and to transmit any useful information (including, by way of example, changes in the relevant legislation, changes to this document, etc.) to the staff, representatives, consultants and all those to whom this Policy applies in order to favour its correct application and to improve its prevention and management capacity.

The most updated version of this document will be published on the website of Legacoop Emilia-Romagna.

CORE PRINCIPLES

Zero tolerance on child abuse

Legacoop Emilia-Romagna does not tolerate any form of child abuse and will not knowingly engage anyone in any capacity who might pose a direct risk to children.

Non-discriminatory

Legacoop Emilia-Romagna is committed to safeguarding children in its activities regardless of their nationality, culture, ethnicity, gender, sexual orientation, religious or political belief, socio-economic status, family or criminal background, or physical or mental health.

Child participation

Every child should be empowered to understand their rights, responsibilities and what to do if they have concerns. Children should be encouraged to raise their voices to call out violations of their rights without intimidation.

Accountability and transparency

Legacoop Emilia-Romagna ensures that the Child Safeguarding Policy is implemented and adhered to, its implementation is monitored, and reviewed on a regular basis considering feedbacks received.

When a suspected case of child abuse is reported action will be taken promptly by following reporting procedures, recording all information. Every report is taken seriously.

Sharing responsibility

When implementing activities in collaboration with institutions or partner organizations that do not have a child safeguarding policy, Legacoop Emilia-Romagna will ensure that they agree to adopt Legacoop Emilia-Romagna Safeguarding Policy for the duration of the project.

Data protection and confidentiality

All Legacoop Emilia-Romagna personnel are required to maintain confidentiality and to comply with data handling processes, such as collecting, storing, transmitting and destroying data. Information can only be shared on a need-to-know basis.

It should be noted however, that sharing of information might be necessary if it is in the best interest of the child or if it is required by statutory bodies.

Capacity building

Legacoop Emilia-Romagna supports capacity-building of families and communities, teachers, health and social workers, medical personnel and others in proximity of children, in prevention and protection efforts, including early recognition of abuse and appropriate responses.

AREAS OF RISK

There are a number of activities undertaken or facilitated by Legacoop Emilia-Romagna which bring children into contact with the association's staff, representatives or contractors. The following are identified as the activities which present the main key areas of risk:

- Organised visits or other outreach activities taking place on Legacoop Emilia-Romagna premises;
- Outreach activities, training and workshop activities undertaken in all types of schools and at all levels, and other venues away from Legacoop Emilia-Romagna's premises.
- School-work program or tutoring projects;
- Events organised by Legacoop Emilia-Romagna or by other bodies at Legacoop premises or elsewhere.

DEFINITIONS

In accordance with Article 1 of the United Nations Convention on the Rights of a Child the definition of a child is “Every human being below the age of 18 years” (regardless of local legislation).

Child protection

Child protection refers to the activities that are undertaken with the aim of keeping children safe from risks and harm.

Child safeguarding

Child safeguarding is an umbrella term that encompasses the policies, preventative measures, responsive actions to allegations and other procedures to keep children safe whilst fostering their development. The overall aim of child safeguarding is to create a safe environment by preventing harm to children’s development, and to promote children’s well-being.

Child abuse

Child abuse is when a minor is being harmed by an adult or another child whether physically, sexually or emotionally, whether intentionally or through neglect.

Physical abuse¹

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,

¹ The following definitions are taken from: [“Child Safeguarding Standards and how to implement them”](#)

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 labor.

STANDARDS OF BEHAVIOUR

Legacoop Emilia-Romagna expects the highest standards of behaviour from the Legacoop Emilia-Romagna community when working with children and protected adults. In particular, Legacoop Emilia-Romagna expects the Legacoop Emilia-Romagna's community to adhere to the following standards:

- Treat all children with fairness, dignity, equality and respect;
- Be sensitive to children's appearance, race, culture, religion and/or belief, sexual orientation, gender or disability;
- Respect a child's right to privacy;
- Always work in an open environment, and where possible avoid situations where you are alone with a child. If it is necessary to hold a confidential interview or a one-to-one meeting, these should be conducted in a room where the exit is clearly visible and, where possible and appropriate, the door to the room is left open;
- Maintain a safe and professional distance in relationships with children. One should not share their personal telephone number, personal email or home address, and one should not connect with them over social media except where that is specifically related to the Legacoop Emilia-Romagna activity;
- When in a position of trust do not engage in sexual relationships with children. This is an abuse of a position of trust and a criminal offence;
- Avoid rough, physical or sexually provocative conduct with children;
- Do not provide children with access to alcohol (where that would be unlawful or inappropriate) or banned substances;
- Be a good role model to children. This includes avoiding the use of inappropriate language (including sexually suggestive comments, sexist, racist, classist, discriminatory language and behaviour);

- Where appropriate, ensure you have written consent before taking photographs or making video or audio recordings of children;
- If one is required to administer first aid to a child one should ensure, wherever possible, that another employee is present, especially if one is concerned that necessary physical conduct may be misconceived.

The standards of behaviours must be taken into consideration by all staff and representatives at all times whenever in contact with children. Staff and representatives should consider all behaviours and actions which may negatively affect children and violate their rights.

Additionally, in line with the organisation's commitment to protecting children, all personnel and representatives are required to adhere to this policy even outside work. Therefore, actions that contradict the core principles outlined hereby will be considered a violation of this policy.

Risk Assessment / Safe Planning

Although it is not feasible to eliminate all risks for children entirely, Legacoop Emilia-Romagna endeavours to reduce these risks to a bare minimum. Therefore, regular risk assessments are carried out in order to identify, evaluate and mitigate risks throughout the organisation's activities.

It is of utmost importance that all activities are carefully designed and implemented by taking into consideration potential risks and threats and by minimising these as much as possible.

Legacoop Emilia-Romagna takes proactive measures at every stage of project implementation to avoid causing harm inadvertently whilst mainstreaming best practices.

Safe recruitment

Legacoop Emilia-Romagna takes great responsibility and all necessary steps to ensure that potential new employees are screened in order to identify any concerns or risks that the individual might pose to children or otherwise.

Declaration Form: All new employees are required to sign a Declaration Form, whereby they confirm that they adhere to the Child Safeguarding Policy and there are no concerns regarding child protection and work with children, and that they have provided the details of any previous issues in connection with child

protection.

Communication / Informed consent

No pictures, videos or any other forms of audio-visual material portraying children can be taken without having previously obtained informed consent from the child's parent/s or legal guardian/s and informed assent from the child herself/him.

Consent should provide information on how the material will be used, for what purposes, how and where the information is stored and for how long.

Consent and assent must be informed, voluntary and unambiguous.

Voluntary: the child and her/his parents or legal guardians must be given the genuine freedom of choice to give or refuse their consent, without providing any further explanation and without any detrimental consequences in the treatment given to them by staff or otherwise negatively affecting their access to assistance.

Unambiguous: the child and her/his parents or legal guardians must express their consent in an explicit, univocal and affirmative manner. Consent must not be in any ways implied.

Informed: the child and her/his parents or legal guardians must be informed about the purposes and the usage of the images and/or video captured. This information must be provided in a language they are able to easily understand, in age-appropriate, clear, and jargon-free terminology.

Children must be portrayed at all times in a dignified and respectful manner and never in a submissive and vulnerable manner.

Social media

Legacoop Emilia-Romagna ensures that its social media platforms are used safely, and that no sensitive information is shared about a child that could reveal their identity and compromise their safety whenever posting images and/or stories from the field.

Additionally, all Legacoop Emilia-Romagna personnel are not allowed to post information regarding their work on private social media accounts unless

authorised. Staff and representatives are not allowed to interact with rights-holders who participate in the association's programmes on any social media platform.

RESPONSIBILITIES

Legacoop Emilia-Romagna recognises its responsibility to safeguard the welfare of minors who come into contact with its staff, representatives and collaborators and undertakes to work closely with state and local bodies to ensure that minors are not put at risk of harm or abuse.

The pro tempore President is responsible for creating a working environment and organisation that fosters the implementation and development of the principles of this Policy.

Throughout the organisation, each person, regardless of their position and according to their role and operational functions, is responsible for creating the same working environment and is obliged to comply with this Policy at all times, even outside working hours.

The pro tempore President is responsible for this Policy and its compliance. Reports of any violations will be taken directly by the President pro tempore who may, if he/she deems it appropriate, delegate an internal staff member to supervise the reporting procedures.

Problem reporting procedure:

1. Legacoop Emilia-Romagna requires all staff, representatives and external collaborators to pay special attention to any problem concerning the welfare of minors.
2. Concerns must be reported promptly in order to exclude the immediate danger of harm or abuse.
3. The person reporting a concern shall make a report of the facts by completing the report form.

4. It is the responsibility of the pro tempore President or the delegate receiving notification of the problem to consider the seriousness of the risk and, if necessary, to contact the local authority, the police or the judicial authority.
5. Staff, representatives and external collaborators are required to cooperate fully with any request from the police or social welfare authority that may arise concerning a report of abuse.
6. If the issue or information involves an allegation against a staff member, it may be appropriate to suspend the staff member from activities involving contact with children until the investigation is concluded.
7. Reports and subsequent corrective action taken shall be collected and kept in a file.

IMPLEMENTATION AND REVIEW

This Policy and Self-Regulatory Procedures for the Protection of Minors comes into force from the date of its approval by the Council of Presidents and will be available on Legacoop Emilia-Romagna's website.

This policy will be reviewed after 12 months and every 3 years thereafter.

Approved by the Council of Presidents on 21 April 2022