

PROTECTION POLICY FOR CHILDREN AND ADOLESCENTS

International Association Francesco Tonucci A.P.S.



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CONTENTS

- I. Reference laws
- II. Introduction
- III. Definitions
- IV. Principles
- V. Scope
- VI. Statement of Commitment
- VII. Code of Conduct
- VIII. Training and Skills Development
- IX. Specific Roles and Responsibilities
- X. Responsibility
- XI. Monitoring
- XII. Transparency
- XIII. Procedures
- XIV. Average

- Code of Conduct
- Internal Reporting Form
- Informed Consent Form

I. REFERENCE LAWS

This document outlines the current child protection policy of the Francesco Tonucci International Association A.P.S. and is based on the following national regulations, directives and laws that form its foundational basis.

1. The 1989 United Nations Convention on the Rights of the Child (UNCRC):
2. Article 3(3) of the Treaty on European Union (TEU)
3. Article 24 of the Charter of Fundamental Rights of the European Union
4. EU Strategy on the Rights of the Child
5. Directive 2011/93/EU
6. The General Data Protection Regulation (GDPR - EU Regulation 2016/679)
7. Articles 2, 3, 30 and 3 of the Constitution of the Italian Republic
8. Legislative Decree 272/1989
9. Law 176/1991
10. Arts. 316 et seq. of the Italian Civil Code
11. Title XII of the Criminal Code, and in particular the articles relating to crimes against minors
12. Law 66/1996

II. INTRODUCTION

The Francesco Tonucci International Association is made up of members and volunteers who together spread the thought of Francesco Tonucci as a means of transforming the Society. Our vision is that of a new society in which children are considered, on an equal footing with adults, as active citizens with their own rights, with the possibility of being heard in matters that affect them directly.

Our mission is to spread this perspective to all levels of government and civil society through training and specific alliances.

We believe that child protection is key to ensuring that children under the age of 18 have the rights, information and space where they can express their views and communicate effectively with other children and adults.

Children are able to become agents of change capable of improving their lives and that of their families and communities only if they are protected from abuse, discrimination and harm of any kind, whether physical, sexual, emotional or neglect.

It is therefore essential that anyone who collaborates with our association aligns themselves with the contents of this document.

III. DEFINITIONS

Child, Minor	Any human being under the age of 18.
Child Protection	The set of measures and structures aimed at preventing and responding to violence, abuse, neglect and exploitation against children.
Child Abuse	Any behavior, voluntary or involuntary, by adults (relatives, guardians, acquaintances or strangers) that seriously damages the psychophysical and/or psychosexual development of the child.
Physical abuse	Intentional physical harm.
Emotional abuse	Behaviors that harm the child's emotional development or self-esteem (e.g., humiliation, threats, isolation).
Sexual Abuse	Involvement of a child in sexual activities that he or she does not fully understand, to which he or she cannot give informed

	consent, or for which he or she is not developmentally prepared.
Negligence:	Persistent failure to meet the child's basic physical and/or psychological needs.
Exploitation	Using a child for the profit or benefit of others.
Staff	All individuals who work for or with the association, including members, volunteers, board members, trainees, consultants, external collaborators, visitors (including journalists, photographers, film crews) and all those who interact with minors in the context of the activities of the Francesco Tonucci International Association

IV. PRINCIPLES

This policy is based on the following key principles

- **Child's best interests:** Decisions and actions concerning children will always give primary consideration to their best interests.
- **Non-discrimination:** All minors will be treated with fairness and respect, without any discrimination.
- **Right to participate:** Children have the right to express their opinions on matters that affect them, and these opinions will be given due consideration according to their age and maturity.
- **Protection:** All children have the right to protection from all forms of violence, abuse, neglect and exploitation.
- **Responsibilities:** The Francesco Tonucci International Association is responsible for implementing this policy and the procedures associated with it.

V. SCOPE

- This policy applies to all staff (as defined in Section III) and to all activities, events, programmes and communications of the Francesco Tonucci International Association, both online and offline, involving minors or information about minors.
- It also applies to any person or organization that participates in activities organized by the international association Francesco Tonucci.
- The organization will conduct specific risk assessments for activities involving children to ensure safe program design.

VI. STATEMENT OF COMMITMENT

- The international association Francesco Tonucci is firmly committed to creating and maintaining a safe environment for all minors with whom it interacts directly or indirectly.
- The well-being and safety of children is our top priority.
- We are committed to protecting children from any form of harm, abuse, neglect, exploitation, and inappropriate conduct by ensuring that our operations, staff, and programs do not harm or expose children to risk.

VII. CODE OF CONDUCT

A detailed Code of Conduct is an integral part of this policy and defines the expected and prohibited behaviors for all staff in their interactions with minors. Violation of this will result in disciplinary action in accordance with internal procedures and may lead to reporting to the competent authorities.

This policy and the Code of Conduct apply to all personnel, who will receive a copy of these documents, demonstrate that they understand them and sign a commitment to comply with them.

VIII. TRAINING AND SKILLS DEVELOPMENT

The association provides initial and periodic bilateral training on child protection for all staff, which includes

- the recognition of different types of abuse and risk signals,
- the principles of this policy and the Code of Conduct,
- internal and external reporting procedures,
- secure information management and
- appropriate communication with minors.

IX. SPECIFIC ROLES AND RESPONSIBILITIES

Within the association, the following important figures for child protection are identified:

Designated Child Protection Contact Person: Primary point of contact for all child protection issues, including receiving internal reports, advising staff, and coordinating with management and external agencies.

Name: Francesca Tonucci
Contact: francesca@francescotonucci.org

Enforcement and monitoring contact person: has ultimate responsibility for the implementation and monitoring of the policy.

Name: Lorena Raquel Morachimo
Contact: lorena@francescotonucci.org

All Staff: Have an individual responsibility to act in accordance with the policy and Code of Conduct and to report any critical issues in this regard

X. LIABILITY

This policy is approved and fully supported by the highest decision-making level of the international association Francesco Tonucci and the signature affixed to this document attests to the formal commitment of the organization to its full implementation.

XI. MONITORING

The effectiveness of this policy will be continuously monitored and formally evaluated. It will be serviced at least every two years or more frequently if necessary.

The review process will include feedback from staff and, where possible, children and their families.

XII. TRANSPARENCY

This policy is a public document, accessible on the website of the international association Francesco Tonucci and available upon request. It will be actively communicated to staff, partners, volunteers, children and their families in an appropriate and understandable manner.

XIII. PROCEDURES

Safe Recruitment: For the recruitment and contracting of all staff who will have contact with minors, strict procedures will be applied:

- Clear descriptions of roles with reference to child protection responsibilities.
- Specific interviews to assess attitudes and awareness regarding child protection.
- Thorough verification of references.
- Criminal background check (general and specific criminal record for crimes against minors, where legally permitted and required for the role).

Data Protection, Communication and Informed Consent:

- Children's personal data will be handled in accordance with the GDPR and European and national privacy laws.
- In the case of activities carried out outside the European borders, the laws of the country where the activity will take place will apply, in addition to the European and national laws of Italy. In the event of a dispute, European laws will apply and in any case those most favorable for the protection of the child.
- Communication regarding children (including images, videos, stories) must always respect their dignity and best interests.
- Written informed consent from the parents/legal guardians and, when appropriate for age and maturity, the consent of the child, will be obtained before using images, videos, audio recordings or personal information for external or internal communication purposes. The consent must clearly specify the purpose, context, duration and manner of use. Minors and their guardians have the right to withdraw consent.

Reporting procedures

- **Reporting Obligation:** All staff have an obligation to immediately report any suspicion or revelation of abuse or risk to a child.
- **Internal Channel:** Reports must be made promptly to the Designated Contact Person for Child Protection
- **Assessment and Action:** The Contact Person will assess the report, record the incident and, in consultation with Management (if appropriate), decide on the actions to be taken, which may include an internal investigation and/or reporting to the relevant external authorities (social services, police), in accordance with national legal obligations. The safety of the child is the priority.

- **Confidentiality:** Information will be treated with the greatest possible confidentiality, shared only to the extent necessary to protect the child and to comply with legal and procedural obligations.
- **Support:** Support will be provided to both the person reporting in good faith and, where appropriate, the person who is the subject of the concern and the child involved.

Grievance Mechanism: A clear, accessible, and secure mechanism is available for making complaints related to child protection or alleged violations of this policy.

Contact person for the evaluation of complaints: Deals seriously and promptly with the complaints received

Name: Ernesto Martire
Contact: ernesto@francescotonucci.org

XIV. MEDIA

Interviews or filming of minors will always require informed consent and will be conducted with respect for the dignity and rights of the child, preferably in the presence of a parent/guardian or designated staff member

Rome, 01.04.2025

Ernesto Maria Gaetano Martire
President

DECLARATION

I have read and understood the standards and guidelines outlined in this Child Protection Policy. I agree with the principles contained therein and accept the importance of implementing and promoting the child protection policies, procedures and practices contained in this document while working with or being associated with the Francesco Tonucci International Association. I am also aware that adherence to the Child Protection Policy of the international association Francesco Tonucci will involve undergoing a check to check for criminal convictions related to working with children, signing a personal statement attesting to any criminal convictions received in the past, declaring any previous investigations or allegations made against me in relation to child protection issues, provide two names as a reference for checks on my person and attach a copy of my identity document.

I certify that I have received a copy of the association's code of conduct, the internal reporting form and the informed consent form. I also provide two references for checks on my person known for no less than 2 years, excluding family members:

Contact Name:	Contact Name:
Address:	Address:
Contact Number:	Contact Number:
E-mail:	E-mail:

Declaration of criminal convictions

Have you ever been convicted of a criminal offense? Sì _____ No _____

If yes, please provide details of all criminal convictions, and state any previous investigations or allegations made against you. These data will be kept confidential by the designated person for the protection of minors of the international association Francesco Tonucci who will assess whether they represent a risk or if they do not comply with the association's child protection policy.

Date _____

Signature

CODE OF CONDUCT

The international association Francesco Tonucci is committed to protecting children from abuse and exploitation and will take all necessary actions to prevent and/or protect children in such situations.

The international association Francesco Tonucci will respond to all reports of actual or alleged abuse according to its child protection policy, regardless of the way the information is transmitted, who concerns the allegations or who the contact person is or where it comes from.

This Code of Conduct includes guidance on the ethical and fair standards of behaviour of adults towards children, and also of children towards other children.

It has been developed with the best interests of the child in mind and should be interpreted in a spirit of transparency and common sense.

The international association Francesco Tonucci aims that everyone, children and adults, in participating safely and effectively in the activities of the international association Francesco Tonucci:

- Are aware of what constitutes child abuse and exploitation (including in the Child Protection Policy) and understand its provisions.
- They know how to recognize signs of abuse and immediately report any suspicious remarks to the contact person for child protection.
- Comply with authority lines and reporting procedures.
- They respect the fundamental rights of other individuals, whether adults or children, treating them with dignity and respect.
- Treat all children equally, being inclusive and involving all children without discrimination.
- Work actively to ensure the highest levels of mutual respect.
- Maintain high standards of personal and professional conduct
- Protect the health, safety and well-being of themselves and others.
- Are aware of high-risk situations among peers (possibility of discrimination against children)
- Are aware of the potential for peer abuse (e.g. bullying of children)
- Are concerned about how their language, actions, and relationships with children might be perceived.
- Put in place special measures to protect younger and particularly vulnerable children from peer and adult abuse.
- Provide an environment conducive to children's personal, physical, social, emotional, moral, and intellectual development.
- Encourage and respect children's voices and opinions.
- Restrict 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 parent/guardian when photographing, filming, or requesting personal information for activities
- Make sure that at least two staff members are present in meetings with children (to allow one of them to go out to meet any immediate needs of the children).
- Ensure that when children with disabilities participate, all buildings are fully accessible to them.

INADMISSIBLE BEHAVIOR. WHAT NOT TO DO.

- Engaging in any form of sexual activity with children.
- Avoid any action or behavior that could be interpreted as bad practice or potentially offensive. For example, never behave inappropriately or sexually provocatively.
- Never allow a child to stay overnight in an adult's room or sleep in the same bed (unless prior consent is provided by both the child and their parent/guardian).
- Do not engage in activities for children that they might do on their own, including dressing, bathing, and combing their hair.
- Do not discriminate, shame, humiliate, belittle or degrade children. This includes anything that can be considered emotional abuse (e.g. using language that mentally or emotionally abuses a child or telling a story/showing images that mentally or emotionally abuse a child).
- Don't physically hit or assault anyone
- Do not act in any way that could be offensive or expose others to the risk of abuse.
- Do not condone violations of this code by others – staff, interns, consultants, partners, volunteers, partners, partners, managers, etc.
- Do not be alone with a child under any circumstances that could be questioned by others.
- Do not allow children to engage in sexually provocative games with each other.
- Do not kiss, hug, caress, rub, or touch a child in an inappropriate or culturally insensitive manner (e.g., do not initiate physical contact, such as holding hands, unless initiated by the child).
- Do not suggest inappropriate behavior or relationships of any kind or encourage any crushes on the part of a child.
- Do not take photos, film or request personal information unless necessary for the activities of The Francesco Tonucci International Association.
- Do not inappropriately use the contact details (including social media accounts) of children outside the programs of the Francesco Tonucci International Association.
- Report any suspicious remarks or suspected abuse, as well as any circumstances or situations that may be subject to misinterpretation, to the child protection contact person.
- Employing children for domestic or other work, regardless of national labor laws, is inappropriate given their age or stage of development, interferes with their education or recreational activities, or puts them at significant risk of injury.

- Develop relationships with children that could in any way be considered inappropriate, exploitative, or abusive.
- Use computers, mobile phones, camcorders, or social media to molest children.
- Access child pornography through any medium.

INTERNAL REPORTING FORM

**This reporting form must be kept in a safe place
and treated with the strictest confidentiality.**

DATA OF THE PERSON MAKING THE REPORT

Name and surname
Role/Institution
Relationship with the minor
Delivery

DATA OF THE CHILD INVOLVED

Name and surname
Sex
Age
Parents or reference adults

REASON FOR REPORTING

Reason for reporting

Is this concern based on information that you have collected directly or reported by someone else? If so, who?

Date of alleged abuse _____

Place of alleged abuse _____

Name of the alleged perpetrator _____

Any relationship with the minor person (if any) _____

Personal observations (visible injuries, emotional state of the minor, etc.) [N.B. Please make a clear distinction between facts, opinions, and hearsay.]

Actions taken

Where is the minor currently and who is responsible for him?

Are other minors involved in the alleged abuse? _____

Who else knows about it?

Any other information

I declare that the information I provide on this form is true:

Date

Signature

Received from the Designated Child Protection Contact:

Date

Signature

INFORMED CONSENT FORM FOR THE USE OF IMAGES/DATA/TESTIMONIES OF MINORS

**Always answering "SI" if it is possible to participate in this activity. If not, contact the staff of
the Association**

DATE:	ACTIVITIES:
I agree to be photographed, videotaped or interviewed and that such material may be published online for the purposes of the association	<input type="checkbox"/> SI <input type="checkbox"/> NO
I understand that the result of my participation may be used in future documents, articles or presentations by the association	<input type="checkbox"/> SI <input type="checkbox"/> NO
I understand that my participation is voluntary and that I can leave at any time without having to explain why, if I don't want to	<input type="checkbox"/> SI <input type="checkbox"/> NO
They explained the whole activity to me in a way that I understood	<input type="checkbox"/> SI <input type="checkbox"/> NO
I was given the opportunity to ask questions and understood the explanation without difficulty	<input type="checkbox"/> SI <input type="checkbox"/> NO
I want to take part in this activity	<input type="checkbox"/> SI <input type="checkbox"/> NO

DATE _____

MINOR NAME _____ **SIGNATURE** _____

PARENT NAME _____ **SIGNATURE** _____

The international association Francesco Tonucci acts in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation). We keep your personal data safe and secure from unauthorised or unlawful processing and accidental loss, destruction or damage and will only use your data for the purposes of the project.