

Child Safeguarding Policy 2025

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1. OUR COMMITMENT TO CHILD SAFEGUARDING

1.1 Mission and Values

Our vision

We believe in welcoming and cohesive communities that support families to ensure the health, well-being, and active participation of children from pregnancy onward.

Our mission

We work to promote the health, well-being, and agency of children across different life contexts, with a particular focus on the early years (0-6) and starting from pregnancy.

We support all families by strengthening parenting skills and working within local communities and through partnerships to build welcoming and engaged environments around children's health and well-being, guided by a logic of shared and collective responsibility.

Our models are grounded in the best international practices, with a strong focus on transcultural perspectives. Our deep local roots allow us to stay responsive to evolving social dynamics.

In our mission to protect and promote children's health and well-being across various contexts and environments, our strategic goals are to:

- Support the potential, rights, and agency of children
- Strengthen families' caregiving capacities by promoting positive parenting
- Foster community engagement in the protection of children and their families

For these reasons, Pianoterra has long been recognized as a pioneer and leading actor in Italy in early childhood intervention (ages 0-6).

All activities carried out by Pianoterra follow specific intervention criteria:

- Professionalism and Multidisciplinarity: Every Pianoterra project involves the collaboration of professionals such as psychotherapists, psychologists, social workers, pediatricians, childcare workers, gynecologists, educators, as well as other specialists (beauticians, hairdressers, actors, photographers, etc.) to form a specialized intervention team capable of addressing diverse needs. Pianoterra staff regularly meet to discuss treated cases, plan activities, and reflect on their methodological approach.

- Early Intervention: Pianoterra's intervention methodology is based on an integrated and early approach, starting from pregnancy and extending through the first 1.000 days of a child's life. Numerous studies (WHO, SSLPs, Lancet, ACP, etc.) demonstrate that offering better opportunities from birth (and even during pregnancy) and expanding maternal and child services—combining care, childhood health assistance, early education, and family support—can prevent health and development issues often found in contexts of marginalization and poverty.
- Individualized Interventions: Pianoterra works closely with the most vulnerable families, establishing a "pact of mutual commitment and responsibility" where the free service or good offered to the user is followed by their active participation in personalized and integrated growth and empowerment pathways—developed in collaboration with other local networks—to strengthen the parents' abilities and skills.
- Bi-generational Approach: Within the integrated program, the bi-generational approach addresses the issues of both parents and children from two adjacent generations. By working with the parents, the child's healthy growth is fostered, counteracting the negative effects that marginalization and poverty can have on development. A well-cared-for child is more likely to become a healthy adult, and thus a proactive parent. Therefore, early investment in new generations can break the vicious cycle of poverty.
- Service Integration: Pianoterra promotes the creation and activation of community welfare capable of supporting the entire family unit in difficulty. The association often leads initiatives to create a support network for each case by involving different partners (family counseling centers, social workers, other associations, etc.) or facilitating the correct use of social and family services.

1.2 Our Commitment

Every intervention implemented by Pianoterra is focused on the well-being and safeguarding of minors, ensuring equal opportunities from birth, and counteracting the effects of poverty and social distress on the development of children and adolescents. Through its projects and initiatives, Pianoterra promotes the creation of an active and cohesive community that can respond promptly and effectively to the many needs of minors, ensuring their protection and support at every stage of growth.

A key aspect of this commitment is the development and implementation of a Safeguarding Policy that ensures the respect of children's rights, the creation of a welcoming environment where children and adolescents can safely develop their potential, and timely identification and reporting of potentially harmful situations.

1.3 Purpose of the Policy

The purpose of this Policy is to promote and ensure the right of all children to be protected from any form of maltreatment, neglect, exploitation, and violence from anyone they come into contact with.

The Policy defines the procedures and best practices that Pianoterra adheres to in order to increase everyone's ability to prevent and minimize the risks of maltreatment, abuse, and inappropriate behavior in its activities, while ensuring prompt and appropriate responses to any concerns or suspicions. Pianoterra adopts and implements this Policy across all its activities and initiatives to be an organization that is safe for minors, respects them, protects them, and values them. The Policy is binding on all personnel, from management to volunteers and visitors, as well as for any organization involved in Pianoterra's projects or programs.

1.4 The Four Pillars of Policy Implementation

Pianoterra is committed to taking every possible measure to prevent inappropriate behavior towards children by any adult in a position of trust, and to report and respond clearly and effectively to any suspicions or concerns. This commitment is primarily applied in the following areas:

- Awareness
- Prevention
- Reporting
- Response

Awareness

Pianoterra aims to raise awareness among its staff and volunteers about the risks of abuse, maltreatment, and exploitation of children. Children and their families must also be informed, in appropriate ways, about the standards of conduct they can expect from staff and representatives, and how to report suspected abuse.

Prevention

Pianoterra is committed to creating and maintaining a safe environment where children's rights are always protected, and risks of abuse or inappropriate behavior are minimized. This is achieved particularly through:

- a) Staff Recruitment: During the selection and hiring of staff (including volunteers), Pianoterra applies specific safeguarding standards to ensure that the personnel selected are suitable to work with minors.
- b) Code of Conduct: All staff, volunteers, and partners must adhere to a Code of Conduct that establishes the principles of interaction with minors.

The Code of Conduct is based on the following principles:

- All children who become part of the Pianoterra ETS Association must feel they are in a safe and protective environment.
- Every minor has the right to be welcomed and listened to by attentive and qualified personnel.
- The beneficiaries of the activities must know, in accordance with their age and cognitive abilities, that the operators of Pianoterra are available to address any doubts, concerns, or difficulties they may encounter.

Reporting and Response

Pianoterra ensures that all staff, volunteers, and partners are aware of when they need to report suspected abuse, who to report it to, and what actions to take.

Pianoterra is committed to ensuring prompt and effective action in response to any report of abuse, maltreatment, or any form of violence, by supporting and protecting the child involved.

1.5 Legal Framework

The Policy has been developed in accordance with Italian and international regulations concerning child maltreatment, abuse, and the protection of rights. Specifically, it is based on the **United Nations Convention on the Rights of the Child (CRC)** and is based on its four core principles:

1. *Principle of Non-Discrimination (Article 2)*: All the rights outlined in the CRC apply to all children and adolescents, regardless of gender, abilities, religion, cultural or social background, or physical characteristics.
2. *Principle of the Best Interests of the Child (Article 3)*: In all decisions, the best interests of the child must take precedence.
3. *Principle of Life, Development, and Protection (Article 6)*: Every child, adolescent, and young person must be guaranteed the right to life, healthy development, and protection from any form of violence or exploitation.
4. *Principle of Participation (Article 12)*: All children, adolescents, and young people have the right to express their opinions, and their viewpoints must be considered, even by adults.

Additionally, the Policy references the following documents:

- Keeping Children Safe, International Child Safeguarding Standards
- United Nations Convention on the Rights of the Child

- Council of Europe Convention on the Protection of Children Against Sexual Exploitation and Sexual Abuse (Lanzarote Convention, April 25, 2007)
- Italian national legislation on child protection
- European Union General Data Protection Regulation (GDPR) 2016/679.

1.6 Scope of the Policy

This Policy includes mandatory requirements that apply to all aspects of Pianoterra's operations.

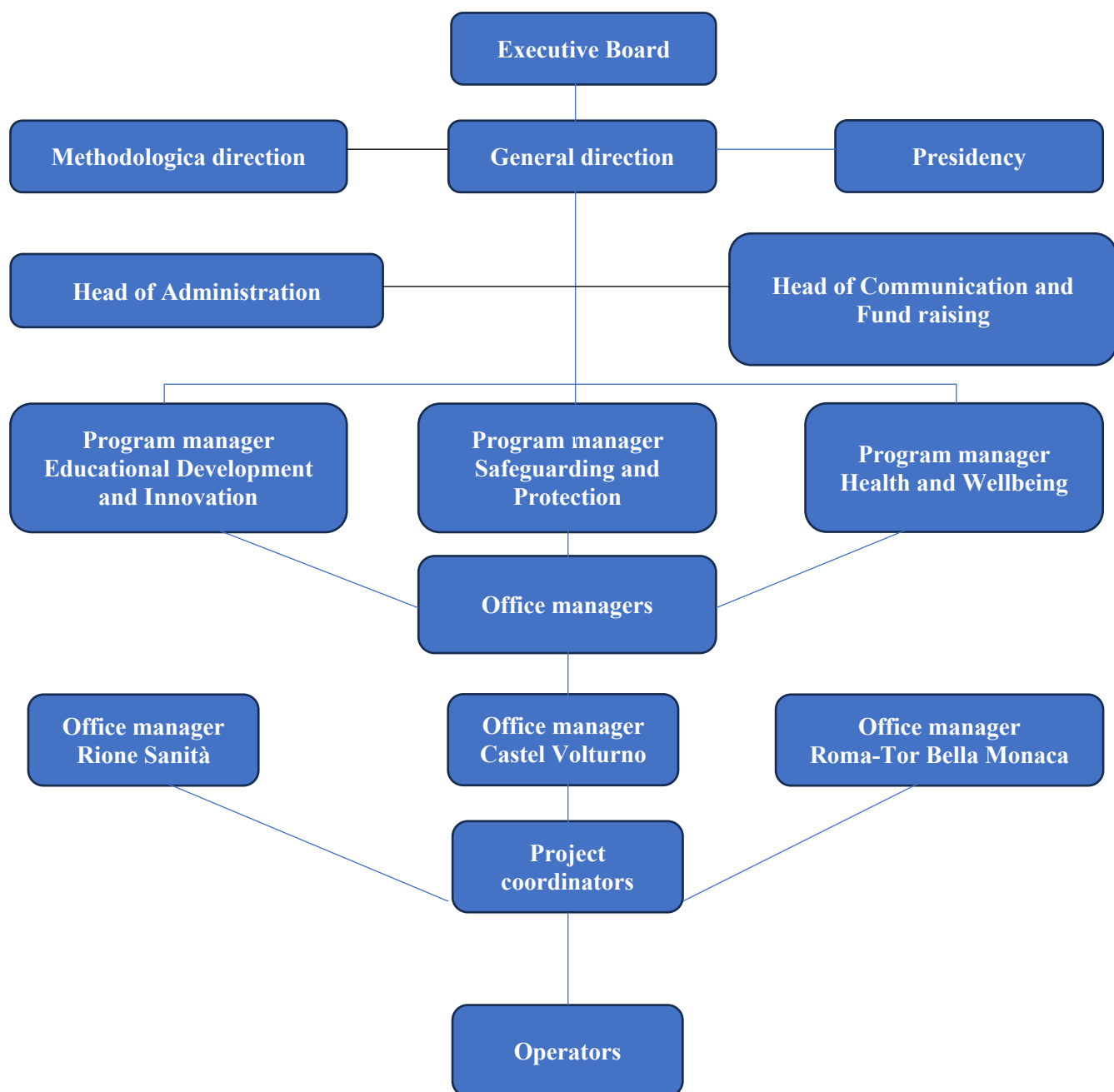
It is recognized and accepted as a shared responsibility to ensure that beneficiaries of Pianoterra's programs, services, and activities do not suffer, nor are they at risk of suffering, harm or abuse as a consequence of their participation in these activities.

The Policy applies to:

- Members of the Board of Directors
- Staff members, collaborators, and consultants
- Personnel and representatives of partner organizations, as well as any individual, group, or organization that has formal or contractual relationships with Pianoterra
- Volunteers
- Visitors

Any report of abuse or exploitation, including sexual abuse, will be managed according to the Reporting Procedure designed to protect the minors Pianoterra serves.

Pianoterra's Organizational Chart.



1.7 Dissemination of the Policy

The Policy documents are available to internal staff, volunteers, interns, and visitors, and can be downloaded from Pianoterra ETS's official website (www.pianoterra.net).

The Code of Conduct and reporting procedures are also summarized through infographics posted in Pianoterra's offices and are available in printed format for all interested parties.

Policy documents are sent via email upon signing any new agreements or protocols of understanding and are discussed and signed when entering into new collaborations.

Upon being taken on, users are informed about the existence of the Policy, its scope, and the tools available to report suspected abuse or maltreatment. They sign a Responsibility Pact, which explicitly references the Policy and the Code of Conduct. Users also participate in monthly informational sessions during which operators discuss topics related to child safeguarding and protection. Children taken on by the organization are engaged, according to their age, in playful activities (reading, symbolic games, role-playing) designed to address topics such as respect for others, friendship, and emotional education. Older children are also informed about the tools available to them (such as the "help box" or individual meetings) to report any situation that endangers their physical or psychological well-being.

2. GLOSSARY

It is important that everyone working for Pianoterra attributes a common meaning to the actions they perform to avoid misunderstandings and inconsistent interpretations of similar behaviors. Below are some basic definitions related to child safeguarding:

Adverse Childhood Experiences (ACEs): A series of abuse situations that occur at a specific moment in the child's life and are repeated over time, with potentially negative long-term impacts on their life cycle. These effects may be visible even in adulthood, years after the maltreatment. These situations include direct violence against the child (such as sexual abuse, psychological and physical maltreatment, and neglect), unsafe family environments (due to parental substance abuse, psychiatric disorders, witnessed violence, or family members in detention), and exposure to societal violence (such as racism, bullying, and structured violence in daily life).

Child Abuse: Any act, or failure to act, that harms a child physically or psychologically, directly or indirectly causing damage or hindering their healthy and safe development into adulthood. The World Health Organization defines the main categories of abuse as physical violence, emotional violence, neglect, and sexual exploitation.

Harmful Situation: A context in which the child experiences suffering, distress, or deprivation from their family or external environment, which may negatively impact their growth and development. It becomes serious if it poses an immediate threat to the child's physical or psychological well-being, risks causing significant or lasting damage, or could potentially be classified as a criminal offense.

Physical Violence: Actual or potential physical harm or injury inflicted by another person (either adult or minor) or by allowing such harm to occur, placing the child at risk of non-accidental injury.

Emotional Violence: A form of abuse involving continuous harmful phrases or actions by a caregiver that can damage the child's physical, mental, spiritual, moral, or social development. This includes forced isolation, prolonged criticism, guilt imposition, verbal threats, intimidation, discriminatory behaviors, rejection, exposure to violence, or involvement in criminal or immoral activities.

Sexual Violence: Any sexual activity involving an adult and a child or adolescent who, due to psychological or emotional immaturity or dependency on the adult, cannot make informed decisions. This includes direct sexual contact, erotic contact, or non-contact acts such as exposing a child to sexual acts.

Sexual Exploitation: A form of sexual abuse where a child or adolescent is involved in any type of sexual activity in exchange for money, gifts, food, shelter, or other benefits for themselves or their family. This form of abuse is often misinterpreted as consensual by both minors and adults.

Child Pornography: Any depiction, by any means, of a child or adolescent engaging in explicit sexual activities, either real or simulated, or any representation of their sexual organs for primarily sexual purposes.

Negligence: Inadequate or insufficient care provided to meet the child's physical, psychological, medical, and educational needs, not caused by economic hardship but by the caregivers' incapacity or unwillingness to provide appropriate care. This includes neglect, poor care, and excessive care.

Harmful Social and Cultural Practices: Many forms of violence against children are based on tradition, culture, religion, superstition, or erroneous beliefs about child development and health. These practices—such as corporal punishment, domestic violence, segregation, mutilation/cutting of female genitalia, early marriage, or child labor exploitation—are often condoned by parents, guardians, or significant adults and sometimes supported by the majority within a community. These practices may cause extreme physical violence and pain, or psychological violence, attacking the human dignity of the child and violating international human rights standards.

Positive Parenting: A teaching and parenting approach that respects children's rights while helping them reach their developmental and educational goals. It fosters a positive environment and addresses conflict situations constructively, without resorting to humiliating or harmful actions.

Care: An ancient concept involving three actions: observing, practicing, and exercising responsibility. Care refers to a system of observation, listening, and action oriented towards ensuring comfort, well-being, and serenity for those to whom it is directed. It is characterized by a responsibility not (only) based on blood relations or individual connections but on social interdependence and solidarity among social workers, professionals, or institutional representatives.

Neglect: severe and persistent failure to meet the (material and psychological) needs of a minor, which primarily manifests in the failure to fulfill the basic tasks of caregiving and protection from harm (including cold and hunger), resulting in significant damage to the child's health and development. Therefore, it is not a single, isolated act but rather a repeated pattern of omissions that generally persists over time and intrinsically deteriorates attachment relationships (Perricone et al., 2022). Neglect can be harder to recognize and understand compared to other forms of violence against children because it is based on acts of omission rather than commission. The types of neglect specified below generally occur alongside other forms of negligence and/or maltreatment:

- **Physical neglect:** refusal or delay in providing the minor with the essential basics of care and fulfillment of basic needs (food, clothing, hygiene, medical care).
- **Educational neglect:** caregivers' failure to provide the necessary basic education, including parental behaviors that result in chronic school

absenteeism, lack of enrollment in mandatory schooling, and/or refusal or failure to provide adequate educational support in the case of difficulties and/or learning disorders (Food in et al., 2007).

- **Medical neglect:** generally understood as a condition where the minor's health suffers because of the caregiver's inability to adequately respond to their medical needs (Cleveland et al., 2023).
- **Emotional neglect:** failure to meet the minor's psychological needs, characterized by the caregiver's lack of responsiveness, emotional unavailability, and widespread disregard for the child's needs for emotional closeness, monitoring, and integration.

Primary victimization: refers to the direct harm caused by the abusive and/or maltreating person.

Secondary victimization: refers to the second trauma a victim experiences, not directly from the perpetrator of the offense but through the response of institutions and society. This occurs by blaming the victim and holding them responsible for the abuse suffered; or through inadequate treatment by institutions (*institutional violence*) when they fail to adequately meet the victim's needs and deny recognition of their constitutionally guaranteed rights.

Vicarious traumatization/Secondary trauma: a condition where psychological stress arises from exposure to someone else's traumatic experiences. A person who comes into contact with someone else's trauma develops similar symptoms, even though they were not directly exposed to the adverse experience.

Online violence/cyber violence: refers to any harmful, harassing, or abusive behavior carried out through digital means (social media, instant messaging apps, virtual games).

Cyberbullying: according to Law 71 of 2017, is defined as a form of bullying that occurs through the use of digital technologies and is characterized by repeated acts of intimidation, harassment, and/or insults/denigration against a person.

Revenge porn: refers to situations where pornographic material (images or videos) is shared online – via instant messaging, social networks – without the consent of the depicted person and with the intent to harm, humiliate, or blackmail them.

Online grooming of minors: a form of psychological manipulation carried out by an abusive adult to overcome children's or adolescents' emotional resistance and establish an intimate – even sexualized – relationship with them through various digital technologies (instant messaging apps, social networks, online video games).

3. ROLES AND RESPONSIBILITIES

3.1 Roles and Functions Involved in Child Safeguarding

All Pianoterra staff are required to uphold the highest standards of personal and professional conduct to protect children.

All staff members must behave in an irreproachable manner towards children. Staff, including those in leadership and operational roles, must understand the role assigned to each person and the related responsibilities in reporting and responding in accordance with this Policy and national legislation.

Below is an overview of the roles involved in promoting and ensuring Child Safeguarding at Pianoterra:

- *Focal Point*: Rossella Mancino (rossellamancino@pianoterra.net).
The person responsible for actively supervising the implementation of the Policy. She ensures that the association and its employees comply with all the requirements outlined in the Policy and promotes it both internally and externally. The Focal Point receives and manages reports from employees.

- *CSP Team*:

Rossella Mancino

Valeria Apice (valeriaapice@pianoterra.net)

Pamela Caprioli (pamelacaprioli@pianoterra.net)

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Giusy Muzzopappa (giusymuzzopappa@pianoterra.net)

Marina Rubino (marinarubino@pianoterra.net)

Enza Schiavone (enzaschiavone@pianoterra.net)

This team, under the mandate of the Focal Point, defines strategies for managing internal and external CSP (Child Safeguarding Policy) cases and plays an active role in staff training and supervising teams involved in reporting procedures.

- *Board of Directors*: Ciro Nesci, Flaminia Trapani, Irene Esposito, Rossella Mancino, Arianna Russo.

The Board is responsible for applying sanctions in the event of violations of the Code of Conduct by Pianoterra staff and overseeing the Focal Point's operations.

- *Managers and Coordinators:*

They are responsible for specific services or service areas provided by Pianoterra. They ensure that the Code of Conduct is followed and report any violations to the Focal Point. Additionally, they oversee that activities comply with the Policy and Code of Conduct.

- *Operators*

They sign and adhere to the CSP, applying its rules. They report any cases of Policy violations.

3.2 Affiliates and Partners

Pianoterra establishes agreements with its partners that define the obligations and rights of both parties. In each agreement, the partner's adherence and commitment to Pianoterra's Child Safeguarding Policy (CSP) is made mandatory, with the CSP attached to the agreement.

If a partner has its own CSP, the protocol reinforces both parties' commitment to ensuring the protection of all children.

3.3 Obligations, Commitments, and Disciplinary Consequences

Pianoterra staff and partner organizations have the obligation to report any suspicions of child abuse or exploitation involving a staff member or representative, whether these are specific reports or unconfirmed suspicions.

Staff members are also required to cooperate in any internal investigation and maintain appropriate levels of confidentiality and discretion. Failure to meet these obligations will be considered a disciplinary offense, which may result in sanctions and, in serious cases, termination of employment.

4. SAFE PROGRAMMING: PREVENTION AND SAFETY

4.1 Key Elements

To ensure the full protection of children and adolescents, Pianoterra defines and implements specific procedures to ensure that:

- The organization's and partners' staff are aware and trained on issues related to child maltreatment and sexual exploitation and are familiar with the procedure for reporting suspected cases of abuse and violence.
- Families and minors served by the organization are informed of their rights and know about the actions taken to protect children.
- All actions and activities are based on a careful assessment and management of risks.

4.2 Safe Recruitment

Pianoterra outlines its commitment to child protection during the staff recruitment process (employees, collaborators, volunteers, interns), excluding anyone deemed unsuitable for working with children.

Pianoterra requires candidates to present their criminal record and excludes from the selection process any individual with convictions for child maltreatment or violence. For positions not directly involving contact with children, a self-certification is required instead of the criminal record.

The association also requires the signing of this Policy and the Code of Conduct, and ensures that staff are properly trained on how to interact with minors.

4.3 Initial and Ongoing Training

Pianoterra ensures that its staff and the staff of its partners receive training both before and during the implementation of activities. This training covers the core content of the Policy, the Code of Conduct, and the Reporting Procedure.

The CSP operational unit is responsible for monitoring and verifying that all personnel are adequately trained on child protection regulations and conduct rules, and conducts periodic checks, updating staff in case of changes to the CSP or every two years.

4.4 Information for Beneficiaries and Families

All families and children involved in Pianoterra's activities are informed about the existence of a Child Safeguarding Policy.

For parents and children aged 0-3, the educational agreement is an essential tool. This agreement is signed with families, defining the operators' obligation to report any instance of violence or maltreatment against a minor to the appropriate authorities.

As for the children, depending on their age, information and awareness activities are organized to explain the role of the CSP and to characterize Pianoterra as a welcoming place where their protection is central to its mission.

The promotion and dissemination of the Policy are further ensured by making the CSP available on Pianoterra ETS's website and through the production of online and offline materials promoting children's rights.

4.5 Risk Assessment

For each project, program, or activity to be implemented, Pianoterra identifies potential risks to the beneficiary minors and assesses their impact. It then develops strategies to minimize these risks. The risks may relate to the type of activity or the target group and are assessed using a specific matrix that defines containment procedures and personnel responsibilities.

These risks may arise from the nature of the activities (e.g., working with children) or from how they are designed. To address this, *Risk Assessments* (Appendix 7.6) are carried out to identify the risks and dangers to children, focusing on aspects such as existing community protection mechanisms, stakeholders involved in child protection, legal agreements, social welfare systems, and organizational capacity.

Based on the results of the risk assessment, risk management strategies will be developed to minimize the likelihood that the implementation of programs or projects will cause harm to children. Therefore, risk assessment will accompany our projects and services at every stage (from the start, throughout, and during closing), with periodic checks.

4.6 Involvement of Children Through Information Technologies

Pianoterra ensures the full protection of minors, even in remote activities and those involving the use of new technologies, by carrying out a specific risk assessment and implementing appropriate containment measures.

The equipment available at Pianoterra's offices is equipped with appropriate filters to ensure secure browsing and protect minors from potential online risks.

Periodic informational meetings are organized with parents and children to promote the safe use of new technologies.

Pianoterra's conduct rules prohibit staff from maintaining personal communication with children and parents outside of the work context and using equipment other than that provided by the Association.

5. REPORTING AND RESPONSE PROCEDURES

5.1 Guiding principles

To ensure children's right to protection, it is essential to have a simple and transparent procedure for reporting any suspected abuse, maltreatment, or exploitation of a child.

Pianoterra commits to ensuring an effective response to every report of suspected abuse or inappropriate behavior based on the following key principles:

- Safety and well-being of the child: The protection of the child is the top priority.
- Professionalism and confidentiality: The entire process is handled with professionalism, ensuring confidentiality for all parties involved.
- Respect for all parties: The rights and dignity of everyone involved are respected.
- Use of best practices: The process follows established best practices for receiving reports of inappropriate conduct or suspected abuse and for filing the report.
- Access to appropriate authorities: Reports are directed to the competent authorities when necessary.

In particular, Pianoterra commits to:

- Ensuring that all staff understand when they need to report inappropriate behavior by a staff member or volunteer or when they suspect potential abuse of a child and what actions to take.
- Informing parents or guardians of the beneficiary children about how and to whom they can report any concerns or suspicions.
- Guaranteeing full compliance with the reporting procedure as outlined in this Policy.

5.2 General procedure

The reporting procedure applies to all Pianoterra employees, collaborators, and volunteers.

The Focal Point is responsible for all services and locations of Pianoterra, with an extraterritorial role.

Pianoterra's partners, if they do not have their own CSP, can use Pianoterra's reporting procedure as provided in the agreements governing their collaboration.

5.3 Roles Involved in the Procedure

The reporting form is sent by email directly to the Focal Point, who is responsible for verifying the validity of the report and defining the strategy for managing it.

In the case of external reports, the Focal Point may activate the CSP Team, which will define the strategy for handling the case and supervise the involvement of collaborators and employees. The Focal Point may also seek advice from additional professionals (such as educators, lawyers, etc.) to manage the case.

For internal reports, the Focal Point will inform the President of the Association, suggest the operational strategies to be implemented, and recommend any necessary sanctions. The President will convene the Board of Directors, which will define and apply the appropriate sanction.

5.4 Reporting Options

- Who can report: All Pianoterra employees, collaborators, and volunteers. Partner organization operators can also report situations of concern if they lack their own policy.
- What to report: Concerns, suspicions, or confirmed cases of possible abuse or harm to a child, involving other children, adults inside or outside the organization, family members, or strangers.
- To whom to report: The report should be sent via email to the Focal Point, with a direct supervisor copied in the communication.
- How to report: Using the provided reporting form, attached to an email. The Focal Point will verify the report and decide whether to involve the **CSP Team** (for external reports) or the President and **Board of Directors** (for internal reports).
- When to report: As soon as possible, but in any case, within 24 hours of the suspicion or recognition of a harmful situation.

5.5 Handling the Report

The Focal Point has the authority to manage the report independently or involve the CSP Team or the Board of Directors through the President and/or consult with other professionals to determine the best strategy for addressing the issue.

A fundamental principle is confidentiality, following the "need to know" basis, meaning that only those who are strictly necessary for the process will be informed.

Staff members and guardians of beneficiary minors also have the right to file a direct complaint with the competent judicial authorities if they witness an event they deem a crime. In such cases, staff must inform the Board of the Association simultaneously.

5.6 Internal Monitoring and Case Archiving

This document is updated every three years. Additionally, each year an internal evaluation of the Policy's implementation is conducted to identify areas for improvement. Based on the evaluation results, a specific improvement plan will be prepared.

The archiving of handled cases will be carried out by the Focal Point, ensuring the privacy of all those involved.

6. CODE OF CONDUCT

Pianoterra places the protection of minors at the center of its mission and establishes rules of behavior for its staff to ensure the safeguarding of children.

The goal of this Code of Conduct is to provide clear guidelines on the standards of behavior expected from Pianoterra staff to ensure the protection of all children who access the Association's services and spaces. The rules included in this Code of Conduct apply to all of the organization's beneficiaries, whether adults or minors, with the aim of creating a safe and welcoming environment for families seeking help from the Association.

Any violation of this Code will result in disciplinary action.

All Pianoterra employees, collaborators, interns, and volunteers MUST:

1. Read and sign the Child Safeguarding Policy and know and respect children's rights.
2. Behave respectfully toward others, whether colleagues or beneficiaries, to create an inclusive and welcoming working environment.
3. Respect the cultural background and religion of the beneficiaries.
4. Adopt an open, welcoming, and cooperative attitude based on careful listening and a proactive approach to beneficiaries, fostering their autonomy and self-expression.
5. Give clear and understandable instructions to beneficiaries.
6. Maintain contact with beneficiaries only in a work-related context and for project purposes, communicating with them only through work tools.
7. Use service emails, PCs, and phones exclusively for work purposes and provide their passwords/PINs to the site manager, notifying them of any changes.
8. Ensure the confidentiality and privacy of beneficiaries by avoiding the dissemination of sensitive information and images outside of work processes.
9. Keep the focus of their work on the child. Any adult behavior that raises concerns or suspicion about the child's well-being must be reported following the rules outlined in the Policy.
10. Wear appropriate clothing for the work environment.
11. Encourage beneficiaries to express their opinions and views by adopting a non-judgmental attitude.
12. Plan activities aimed at minors safely, adapting proposals to different ages and needs.
13. Report any violation of the rules of conduct according to the procedures outlined in the Child Safeguarding Policy.

All Pianoterra employees, collaborators, interns, and volunteers MUST NOT:

1. Share personal contact details (phone, social media accounts, etc.) with beneficiaries. Communications with beneficiaries should only take place through the channels provided by the organization and for project purposes.
2. Record or photograph beneficiaries with personal devices or share their images outside of the authorized channels provided by Pianoterra.
3. Be alone with minors, where possible. If unavoidable, ensure they are always visible to other adults during work and inform colleagues of the situation.
4. Physically or emotionally mistreat minors by imposing corporal punishments or adopting denigrating or aggressive attitudes that could undermine their physical or emotional well-being.
5. Engage in any sexual activity with minors under 18 years old or with adult members of the families receiving assistance.
6. Ignore or encourage any violation of this Code of Conduct.
7. Use drugs or alcohol during working hours or perform their duties while under the influence of drugs or alcohol. It is also forbidden to distribute or sell illegal substances in the workplace or during working hours.
8. Advertise or sell goods or services to beneficiaries in the workplace and during working hours.
9. Give or receive personal gifts to/from beneficiaries outside of project parameters and objectives. Accepting money from beneficiaries is strictly prohibited.
10. Undermine the work or criticize the decisions of colleagues in the presence of beneficiaries.
11. Use personal transportation to accompany beneficiaries unless absolutely necessary and with prior consultation and authorization from superiors.

Violations of the Code of Conduct will be evaluated by the President of the Association, who, in agreement with the Focal Point, will determine the appropriate measure to be taken. Possible actions include verbal and/or written reprimands, suspension without pay, dismissal of the involved staff member, and, in the most serious cases, reporting the incident to the appropriate authorities.

7. ANNEXES

Annex 1

SELF-CERTIFICATION / SUBSTITUTE DECLARATION OF THE CRIMINAL RECORD CERTIFICATE

Whereas:

1. The positions sought and selected by Pianoterra ETS, for any role or qualification, may involve duties that include direct contact with children or adolescents, either individually or in groups, one-on-one interactions without supervision, or roles in the management of programs that provide direct support to children and adolescents;
2. It is essential that candidates demonstrate impeccable conduct, especially in interpersonal relationships with children and adolescents, as required by Pianoterra's Child Safeguarding Policy.

I, the undersigned,
born in on .../.../.....,
Tax Code,
ID document: no.
issued by on .../.../.....,
resident in (.....), at the address
.....
in the role of:

☐ **consultant** ☐ **volunteer** ☐ **intern / trainee**

at Pianoterra, as part of the project/activity based in
.....

aware of the importance of the declarations made herein to Pianoterra ETS and of the civil and criminal consequences for anyone who makes false or misleading statements, pursuant to Article 76 of Presidential Decree 445/2000 and Article 640 of the Criminal Code, as well as the fact that such falsehoods or omissions constitute just cause for dismissal pursuant to Article 2119 of the Civil Code, or valid reason for termination of the working relationship,

hereby declares and guarantees

under their full and direct responsibility

with specific reference to the criminal offenses set forth and punished under Articles 600 bis, 600 ter, 600 quater, 600 quinquies, and 609 undecies of the Italian Criminal Code:

1. that no criminal proceedings are currently pending against them;
2. that they have not received any criminal convictions, even if not final (including those subject to amnesty, pardon, clemency, or judicial forgiveness);
3. that they are not aware of any ongoing criminal investigations against them;
4. that they are not, and have not been, a defendant or under investigation for any crimes, whether resulting in a final sentence or affected by a statute of limitations;
5. that they have not received any convictions that entail the additional penalty of permanent disqualification from holding any position in schools of any level, or from any office or service in public or private institutions or facilities mainly attended by minors (as per Articles 609-nonies paragraph 2 and 600-septies paragraph 2 of the Criminal Code), nor have they been subject to any security measures prohibiting them from performing work involving habitual contact with minors (as per Article 609-nonies paragraph 3 of the Criminal Code).

The undersigned also undertakes to promptly inform Pianoterra of any changes or updates concerning the above statements.

A copy of a valid identification document is attached hereto.

Place and date/...../.....

Legible signature of the declarant

**DECLARATION OF ACKNOWLEDGEMENT AND ACCEPTANCE OF THE
SAFEGUARDING POLICY AND CODE OF CONDUCT**

I, the undersigned,

Born in (.....), on / /

ID Document No.

Issued by, on / /

Tax Code

Resident in (.....), at the address

In the role of:

☐ coordinator / manager

☐ staff member / operator

☐ intern / trainee

☐ volunteer

☐ workshop expert

within the project/program of the Pianoterra Association

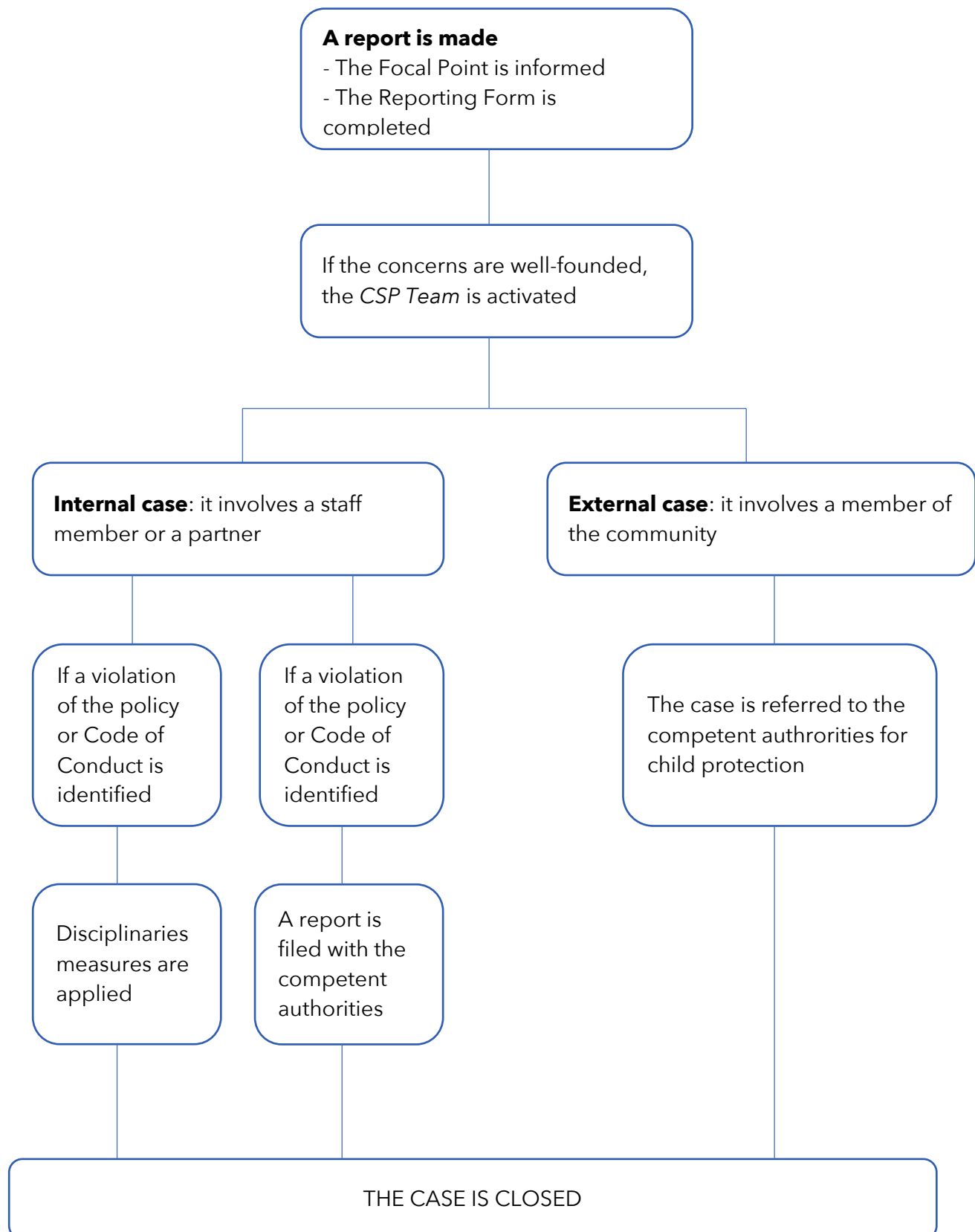
HEREBY DECLARE

- that I have received, read, and therefore AGREE TO COMPLY WITH the Safeguarding Policy throughout the entire duration of my collaboration with Pianoterra ETS;
- that I have received, read, and therefore AGREE TO COMPLY WITH the Code of Conduct throughout the entire duration of my collaboration with Pianoterra ETS.

Place and date, / /

Legible signature of the declarant

REPORTING FLOWCHART



SUMMARY OF THE REPORTING PROCEDURE

Alleged perpetrator: Internal or external to Organization

Who is reporting: staff member, consultants, volunteers, visitors, partners, beneficiaries.

WHAT TO REPORT

A concern, suspicion, or certainty regarding possible situations of abuse or harm involving a child, perpetrated by other children, adults either internal or external to the organization, family members, or unknown individuals.

WHEN AND HOW TO REPORT

Promptly, within 24 hours. Staff members can report using the specific reporting form to be sent via email to: rossellamancino@pianoterra.net. Children can report to their parents or to any staff member at any time and/or through the "Helping Box" device.

WHO TO REPORT TO

Staff members report to the Focal Point, copying their direct supervisor. Children may report to staff members, the coordinator, volunteers, external consultants, parents, or legal guardians. In cases of suspected abuse in external settings, those responsible must report to the relevant external contacts, law enforcement authorities, or the guardians or legal representatives of the children involved.

WHAT HAPPENS NEXT?

The Focal Point has the authority to manage the report independently through an internal investigation, as well as to involve the Child Safeguarding Team (CSP Team) or the Board of Directors through the President, or to broaden the case management to include other professionals. The investigation will be conducted by listening to the person who reported the harm or abuse, the alleged victim, the suspected perpetrator, and anyone who may provide evidence or relevant information.

POSSIBLE CONSEQUENCES

Concern mitigation

Disciplinary action

The case is reported to the judicial authorities, law enforcement, and social services

The case is followed up and, where possible, feedback is provided to the parties involved, in compliance with confidentiality and privacy.

INITIAL REPORTING FORM

Date: .../.../.....

Reporter (name and contact details):

Service/Organization:

Relationship with the child:

Child's Full Name:

Date and Place of Birth: .../.../.....,

Current Address:

Household Composition:

.....

Contact Information:

Is the family already known to local services?

If yes, which services?

Contact details:

Describe what happened, including as many relevant details as possible to help understand the situation:

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

What has already been done? (e.g. emergency actions taken, services already involved, contacts made)

.....

.....

.....

.....

.....

.....

Who else is aware of this case?

.....

.....

THE RISK ASSESSMENT PROCESS AND THE RISK MATRIX

When designing or reviewing a program or project activity from a child protection perspective, a **Risk Assessment** should be conducted to evaluate potential risks of abuse or exploitation. The goal is to identify the most appropriate measures to mitigate and manage any identified risks.

Below is an example of a basic Risk Assessment. It involves an analysis of project activities using a set of key points/questions, which help compile a **Risk Matrix**. This matrix includes management actions and designated responsibilities to effectively address and monitor the identified risks.

The risk assessment process

Phase 1 - Identifying risks to Child Safeguarding

Various approaches are typically used to identify risks, including: checklists, experience-based evaluations and judgments, intuition, and system or situational analyses. The key questions to consider during this initial and broader Risk Assessment include:

- What are the practical details of the project (e.g. planned actions in different cities) in light of the main risk factors?
- What could go wrong?
- How likely is it to happen?
- What could the consequences be?
- What actions should be taken to minimize these risks? Who is responsible?
- How will this process be monitored?

When assessing project activities or programs to ensure they are safe for the children and adolescents they are intended to benefit – and to protect all minors we work with from any form of abuse or exploitation, as established in the Child Safeguarding Policy (CSP) – we take into account at least seven specific risk factors, broken down into key aspects with examples provided.

RISK FACTOR	<i>Risk aspects and examples</i>
AGE / VULNERABILITY OF THE CHILD	<ul style="list-style-type: none"> • Very young children • Low level of education • Orphaned or abandoned children • Children with disabilities • Children who have already been abused or sexually exploited • Lack of parental supervision • Children displaced from their community/context
LOCATION / PROCEDURES	<ul style="list-style-type: none"> • Isolated areas • Disaster zones or areas affected by war or civil unrest • Crowded areas • Refugee camps • Projects located far from the community or in inaccessible places • Staff visiting children's homes • Physical hazards in the environment (e.g. lack of water, traffic, etc.)
ACTIVITIES	<ul style="list-style-type: none"> • Working in direct contact with children • One-on-one activities • Physical contact involved • Tasks involving personal hygiene care • Use of volunteers
STAFF	<ul style="list-style-type: none"> • Staff not adequately vetted (e.g. no interviews, criminal background checks, or references) • Rapid recruitment in response to emergencies • Lack of adequate supervision by a manager • Staff not trained or aware of the Child Safeguarding Policy (CSP) • Code of conduct not signed
SUPERVISION (BY A MANAGER)	<ul style="list-style-type: none"> • Staff working without managerial supervision • Volunteers not supervised by staff • Lack of formal supervision • Lack of accountability or transparency in practices • Nonexistent or informal supervision (e.g. visitors present during activities with children that are not overseen by staff)

ORGANIZATION AL CULTURE	<ul style="list-style-type: none"> • Organization closed off or unaware of child protection rights • Low engagement of managers or staff on child protection issues • No promotion of protective measures or key safeguarding messages • Culture of "not raising concerns" or "not reporting inappropriate staff behavior"
LOCAL FACTORS	<ul style="list-style-type: none"> • Weak enforcement of child protection or abuse prosecution laws Deficiencies in child support services • Areas affected by criminal organizations that impact children and the community • Sexual exploitation trafficking • Child labor

The presence or detection of one or more of these factors should lead to a verification for each individual project action, assessing the likelihood that children may be subjected to abuse, understanding what kind of abuse and by whom, and identifying actions to mitigate or eliminate that risk.

Phase 2 - Considering the likelihood that the risk will materialize

Within the Matrix, a number (from 5 to 1) will be assigned to indicate how likely we believe the identified risk area is to materialize, according to the following scale:

5 – practically certain (expected to happen in almost all circumstances)

4 – likely (will probably happen in many circumstances)

3 – possible (could happen sometimes)

2 – unlikely (not expected to happen)

1 – rare (expected to happen only in exceptional circumstances)

Assigning a score is useful to define priorities or urgencies of actions: when organizing measures to reduce/eliminate risks, we will start with those that are more likely to materialize (4 or 5), but we will also consider those for which the potential consequences are severe.

Considering the consequences of the risk is equally important as the likelihood that the risk factor will be present/occur. Consequences are defined according to the following scale: 5 – severe; 4 – major; 3 – moderate; 2 – minor; 1 – almost none.

For example, it might be unlikely (2) that a potential staff member has a history of suspicious or abusive behavior towards children; however, the consequences of hiring someone to work in a community of vulnerable individuals would be severe (5).

Phase 3 - Strategies to minimize risks

We will then attempt to outline what strategies or actions we can implement to minimize the identified risks. Some examples of possible interventions to mitigate risks include:

- Monitor and evaluate (when the risk is low)
- Avoid activities (if the risk is too high)
- Modify policies, procedures, or plans to reduce the possibility of harm
- Transfer the activity to another organization or form partnerships
- Continue the project and accept the risk that something may happen
- Other:

When defining strategies to mitigate risks, it is necessary to also indicate: how it will be done, who will do it, and how everything will be monitored.

Phase 4 - Risk monitoring

The process of Risk Assessment and management regarding Child Protection should indeed be an ongoing process over time. Monitoring the risk is also an essential part of reviewing the Child Protection Policy and the Guidelines. When filling out the Risk Matrix below, it is necessary to indicate methods, timelines, and responsibilities/roles in monitoring.

- Are the risks identified earlier still present?
- Have they been reduced, controlled, or managed by the strategies put in place?
- Are there new types of risks?
- What new strategies are needed to reduce, eliminate, or control emerging risks?

The risk matrix

To facilitate the Risk Assessment process, we use a descriptive matrix that must be completed based on the points outlined above.

The matrix is used to identify and summarize, in a clear and immediate way, specific project-related risks identified in individual contexts/locations.

The person completing the matrix will be asked to summarize the context, provide an analysis of the specific risk, assess the likelihood of it occurring, and describe the actions to be taken to mitigate such risk.

This must be done for each project activity for which a potential risk to child protection can be assessed.

Below is an example of a completed matrix used for the annual review of program activities (Save the Children Australia, 2010):

Example:

Key activities	Risk Area	Likelihood of occurrence (level) / consequences (severity level)	Risk mitigation	Risk monitoring
Project	Name: Youth Outreach Project			Monitoring responsible: project coordinator
Creation of youth networks; Training sessions.	Staff and volunteers work in direct contact with children and adolescents.	3 (possible) / 4 (major)	Initial selection and training of staff and volunteers. Staff and volunteers visit the villages exclusively in pairs to meet with the children.	Selection and training records are monitored. Volunteer agreements and working arrangements are supervised.

RISK MATRIX

Matrix filled out by:
Date:/....../.....

Key activities	Risk Area	Likelihood of occurrence (level) / consequences (severity level)	Risk mitigation	Risk monitoring
Project	Name: Youth Outreach Project			Monitoring responsible:

MUTUAL COMMITMENT AND RESPONSIBILITY AGREEMENT

The **PIANOTERRA ETS Association** helps parents and their children grow up healthy, strong, and safe, with the support of the whole family.

After meeting with Mr./Ms. _____, we have decided to read, discuss, and sign this agreement to clarify what we are committed to doing together.

What PIANOTERRA commits to:

- Create and share with you a personalized plan that values your skills and experiences and helps you become more and more independent;
- Stand by your side to help you feel good about yourself and your child;
- Speak openly and honestly;
- Listen to and respect your ideas and your culture;
- Seek out other people and services that can help you, your child, and your family assert your rights;
- Always maintain contact with you and your family;
- Identify, together with you and the members of your family, the activities that can best help and support you;
- If there are situations that put you or your child in danger, Pianoterra will follow the rules set out by the **Child Safeguarding Policy** and **Italian Law**. For us, it is essential that you, your child, and your family can live in a protected and safe environment.

What YOU commit to:

- Carry out the plan we designed together to support you, your child, and your family;
- Remember that for Pianoterra, your safety, as well as that of your child and your family, is fundamental – you can rely on our staff if something worries you;
- Maintain a positive, respectful, and cooperative attitude;
- Respect the staff, people, places, objects, and our work;
- Be punctual, keep your appointments, and respond to communications from Pianoterra;
- Participate in and/or have your child participate in the activity _____, which takes place on _____ at _____, starting in the month of _____;
- Take part in important decisions and actions, even in difficult times, with respect and a spirit of cooperation.

(Place), on _____

Staff member's signature

Family member's signature

Associazione Pianoterra ETS

Sede di Napoli Piazza San Domenico Maggiore 3 | 80134 Napoli | 081.293433 – 347.3021193 – 344.1600567 | info@pianoterra.net

Sede di Roma Largo di Sant'Alfonso 5 | 00185 Roma | 06.64871120 – 340 0716353 | comunicazione@pianoterra.net

CF/P.IVA 05986571213