

A.E.C.I. APS CHILD SAFEGUARDING POLICY & FRAMEWORK

FOREWORD

A.E.C.I. APS – *Associazione Europea Consumatori Indipendenti* is the national head office, which holds a power position as a certified *Consumers' Organisation* and *Social Promotion Association*, moreover is an internationally recognised organisation within BEUC – *The European Consumer Organisation*.

By Statute, registration is reserved for adults or, if minors, the application for admission must be authorized and countersigned by the parental responsibility holder.

The involvement of minors by A.E.C.I. APS takes place exclusively in the implementation of activities related to projects funded by Public Administrations or Public Institution.

A.E.C.I. APS takes the view that any form of violence against children is unacceptable. Whatever the type of violence used - physical, sexual, and psychological or violence due to negligence – only a clear and consistent policy framework can prevent and fight against such forms of abuse. In all of our projects, we are committed to ensuring that each child enjoys the benefit of a protective environment in which their rights are respected. This is why we update our rules relating to children's rights on a regular basis, integrating the highest requirements according to international standards and current best practices. It is with this in mind that we have written the «*Child Safeguarding Policy*» which will be applied to all of our organisation's activities and adopted by all regional and territorial offices.

We have a responsibility to ensure this does not result in harm, abuse or exploitation of any kind. *The Child Safeguarding Policy & Framework ('Safeguarding Policy')* sets out the measures that must be taken to ensure:

- **PREVENTION:** All reasonable steps are taken to prevent harm, abuse and exploitation across our operations;
- **PROTECTION:** All safeguarding concerns are taken seriously and receive a robust response which prioritises the safety and well-being of those at risk;
- **PERSONIFY:** Representatives of A.E.C.I. APS maintain the highest standards of behaviour and fulfil their responsibilities to keep people safe;
- **ACCOUNTABILITY:** Accountability and transparency in delivering safeguarding;
- **PARTNERSHIP:** Listening to the organisations we cooperate with, individuals with lived experience and others in the sector to continually learn and improve.

SCOPE

The aim of the policy and procedures is to regulate how we work as an organisation so that the children with which we come into contact (either directly or indirectly) are safeguarded and have their wellbeing promoted, and that our actions, while implementing programmes or institutional activities, do not cause any harm to children.

All representatives of A.E.C.I. APS must read and comply with the measures outlined in this *Framework*. This includes:

- All Staff, whether employed permanently or as a consultant or contractor
- Trustees and Committee Members
- Volunteers and Interns
- Agencies or organisations employed to deliver services on our behalf

PRINCIPLES UNDERPINNING OUR SAFEGUARDING POLICY

Our *Safeguarding Policy* is based upon a number of principles and beliefs, including:

1. All children have equal rights to protection and to have their wellbeing and participation promoted.
2. All actions regarding child safeguarding must be taken in the best interest of children. This includes an understanding that in all our programmes and activities we must ensure that we respect children's rights and do not cause harm.
3. Everybody has a responsibility for safeguarding. This policy is mandatory for all those who work for or on behalf of *A.E.C.I. APS*, including staff, volunteers and partners. Although training, advice and support will be provided, everyone should actively participate so that they can carry out their responsibilities towards safeguarding children.
4. We work in a transparent and open way where child safeguarding is made a priority, recognising that situations of abuse and harm are able to flourish when staff, volunteers, partners, children, families and community members do not feel able to raise their concerns.
5. All reports of concern regarding the safety and protection of a child will be taken seriously. Where necessary, appropriate steps will be taken to protect the child and to take action against the alleged perpetrator. This may include referrals to law enforcement and child protection agencies. In relation to allegations against staff, volunteers and partners, action may also include the suspension or termination of engagement or any type of cooperation.
6. No single organisation is able to safeguard children by working in isolation, and therefore we will work with other organisations, agencies (such as state departments and ministries with a mandate to protect children) and groups as necessary and appropriate.
7. We maintain confidentiality and do not disclose personal details of those involved in child protection concerns, including the names of those raising concerns unless it is necessary to pass on information to ensure that a child is protected (for example where a child may need specialist services or where a criminal offence may have been committed).
8. We raise awareness and influence others on the importance of safeguarding children, using our policy and procedures as a way of both highlighting our commitment and also of explaining our values. We will share our policy and procedures with others, and be open to feedback regarding its application and relevance.
9. We work within the framework of international and national laws and policies regarding safeguarding.
10. There is no one specific way of safeguarding children and promoting their rights. Solutions to protecting children need to reflect the culture and operating environment and the nature of activities being undertaken. However, culture can never be used as an excuse for abuse. While country delegations can propose amendments and modifications of the procedures, this must be done within the framework of requirements set down within this policy. It is not acceptable for a reduced level of safeguarding to be offered.

OUR SAFEGUARDING POLICY | FOCAL POINTS

The *Safeguarding Policy* of our Organisation is divided into 4 main Areas which reflect the different aspects of *A.E.C.I. APS* work in prevention or in taking action:

1. **PREVENTION**
2. **PROTECTION**
3. **ACCOUNTABILITY**
4. **PARTNERSHIP**

1. PREVENTION

This section of the *Policy* identifies specific steps and concepts which translate the vision of safeguarding children into action. Child safeguarding runs across the whole organisation and is not just associated with programmes and projects or Human Resources. The concept of thinking about safeguarding - and reducing risk - should be embedded in everything that we do, from recruiting a staff member or volunteer, to selecting a partner, through to running an activity and designing and implementing a programme or other institutional activity (such as promotion and fundraising).

Safeguarding risks must be regularly reviewed at all levels. It should be remembered that although we normally think of safeguarding issues when an adult is mistreating a child, children can also be the perpetrators of abuse. This normally occurs where one child is in a position of power or influence (for example because the child is older, or the child being abused comes from a marginalised group) and is often referred to as 'bullying'. In such cases while action is necessary to support the child being bullied, it is critical to remember that the perpetrator is also a child, and therefore interventions should be in the best interests of both children in terms of how to support the abused child and what response is required for the abusive child.

2. PROTECTION

On the basis of the activities carried out by the organization, it is noted that the involvement of minors occurs in the implementation of activities connected to projects funded by the Public Administration (for example, meetings in schools, flash-mobs, etc.) and in their dissemination.

Consequently, we organized the management of activities and communication involving minors.

A *Decalogue* could be outlined, which reflect the idea and approach of Organisation to ensure the enforcement of *Child Safeguarding Policy*:

- 1) Respect the *Child Safeguarding Policy* and its procedure.
- 2) Make sure that the safety of the child will not be compromised if one disseminates images of his or her home, community or environment.
- 3) Be accompanied by an employee of *A.E.C.I. APS* while doing a report (video, photo, etc.).
- 4) Obtain permission from the child and the person who is responsible for looking after him or her.
- 5) Ensure that the child does not pose in any inappropriate manner (sexual connotations etc.).
- 6) Do not take or publish photos of children who are completely naked or dressed inappropriately. Images of children which are exploitative or offensive must not be used.
- 7) Always respect the children's dignity. Do not represent the children as victims (weak, desperate etc.). Images should present children in a 'positive way'. Similarly stories about children should aim to report not only the negative aspects of children's lives, but also their strengths rather than sensationalising the child's experience.
- 8) Taking pictures or videos is reserved for strictly professional use. Staff, volunteers and visitors are encouraged to 'like' and 'share' photographs published on official *A.E.C.I. APS* websites and social media sites (such as Facebook). In this way, officially approved photographs may be distributed more broadly on personal social media sites. Unofficial photographs must not be posted or uploaded on personal pages.
- 9) Never indicate in the files any information that could endanger the child victim of abuse (title, metadata, captions etc.). When publishing/distributing photos, images, stories etc., personal information must be removed to ensure privacy (i.e. names and addresses must not be included and if necessary other identifying features such as school name should also be omitted).
- 10) Only use photos available for public use (verified and validated by an official representative of *A.E.C.I. APS* or/and by the person in charge of visual communication).

3. ACCOUNTABILITY

Everyone has a responsibility for ensuring that the *Child Safeguarding Policy* is implemented as set out in the policy and procedures outline in this document and as may be adapted to suit local or specific conditions.

The President, by mandate from the Council, has overall responsibility for the *Child Safeguarding Policy*. Directors are responsible for determining policy and good practice and for implementation of the policy in all activities related to their areas of organisational responsibility.

Every 2 years, *A.E.C.I. APS* shall conduct a self-assessment of safeguarding and the implementation of the *Child Safeguarding Policy*.

Based on the self-assessment, a plan of action will be developed to address any gaps in policy implementation and to mitigate any risks identified.

This policy will be reviewed on a regular basis, but not more than every 2 years. Such reviews will also include feedback from staff working, and where possible, the views of children, their families as well as other local stakeholders.

4. PARTNERSHIP

When engaging schools and colleges in our work.

A.E.C.I. APS often works with schools and institutes across Italy as part of our public activity or fundraising. Although schools and institutes have their own safeguarding policies and procedures in place, it is important to clarify our respective roles and responsibilities. We achieve this by:

- The measures set out in the ‘Safeguarding Checklist for Engagement’ of Schools and Institutes are followed at all times;
- Prior to any visit, *A.E.C.I. APS* will write to the school to clarify roles and responsibilities in relation to safeguarding;
- Where individuals are visiting schools on behalf of *A.E.C.I. APS* but without a member of our staff present, they will be asked to sign a Safeguarding Memorandum of Understanding prior to the visit and must be accompanied by school staff at all times; and
- *A.E.C.I. APS* will ensure that informed consent is obtained for any filming or photography and this must contain specific consent for use by *A.E.C.I. APS*.

When cooperating with other Partners

Before cooperating with other Partners *A.E.C.I. APS* includes safeguarding in our due diligence checks before approving new partnerships; includes safeguarding clauses in contracts with Corporate Partners.

Where Corporate Partners directly engage with children and/or adults with additional care and support needs as part of their core business, we request copies of their safeguarding policies; and In general, *A.E.C.I. APS* aiming to improve our policy, listens to the organisations we cooperate with, individuals with lived experience and others in the sector to continually learn and improve.

Every single territorial office joining the *A.E.C.I. APS* network adopts the *Child Safeguarding Policy & Framework* approved.

OWNER & VERSION

Approved by: MEMBERS OF THE BOARD OF DIRECTORS in enactment of The Child Safeguarding Policy & Framework implemented and enforced by *A.E.C.I. APS*

Date: 27 June 2024

Review interval: 2 years

Next review due: June 2026