



***CHILD PROTECTION POLICY
GUIDELINES, PRINCIPLES AND
PROCEDURES FOR THE PROTECTION
OF MINORS***

PREMISE

For over twenty years, the Luogo Comune social cooperative has been involved in projects aimed at the well-being of people throughout their entire life cycle.

Since its inception, attention to the rights of minors has been a point of extreme attention within a plurality of activities and services carried out.

The theme of minors' rights and their protection is therefore central to every action of the Coop and to every action of the professionals who report to it, both members and collaborators.

In this sense, this Policy has been edited so that it can have a guiding value and perform a direct dissemination function both within the cooperative and among users and the various stakeholders of the community in which we operate, concretely promoting awareness-raising and sharing actions on the topic of safety and the protection of minors.

*The President
Amelia ARGIRO'*

Knowledge - The sources

The Policy of Coop Luogo Comune is based on the UN Convention on the Rights of the Child and on its four founding principles – non-discrimination (art. 2), best interests of the child (art. 3), right to life, survival and development (art. 6), participation (art.12) – and on the optional protocols of the Convention.

This Policy also refers to the following documents:

- ✓ FCS Code of Ethics which specifies the mission and values of the organization;
- ✓ Keeping Children Safe, International Child Safeguarding Standards;
- ✓ Core Humanitarian Standards, together with the Child Protection Minimum Standards;
- ✓ all United Nations conventions and declarations relating to children;
- ✓ European Convention on the Exercise of Children's Rights;
- ✓ Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse, Lanzarote Convention, 25 April 2007;
- ✓ Italian national legislation on child protection;
- ✓ European General Data Protection Regulation (EU) 2016/679 ("GDPR").



Vocabulary – Definitions

Here are the main definitions:

- **Child** : this term refers to both children and adolescents, therefore the policy concerns the protection of all minors, up to the age of 18 .
- **Child abuse** : any act, or failure to commit an act, that physically or psychologically harms a child, that directly or indirectly causes harm or precludes the prospects of healthy and safe development into adulthood ⁽¹⁾. The main categories of abuse are defined by the World Health Organization as physical violence, emotional violence, neglect and negligent treatment, sexual abuse and exploitation ⁽²⁾. We intend to include witnessed violence in these categories ⁽³⁾.
- **Sexual Exploitation of a Child**: any actual or attempted exploitation of a condition of vulnerability, power differential or trust in a child for sexual purposes, which includes – although not exclusively – the obtaining of economic, social or political profit.

Common Place believes that:

- any sexual activity without consent is to be considered an abuse and a crime;
- any sexual activity with a minor who is under the age of legal consent in the country in which he or she lives, regardless of his or her presumed consent, is considered abuse;

¹Children can be abused by people known to them or, more rarely, by strangers; in the family or in an institutional or community context or in digital environments, or as well as in the course of procedures that cause real or potential harm to the health, survival, development or dignity of the child.

²Law no. 172 of 1 October 2012, ratifying the 2007 Council of Europe Convention for the Protection of Children against Sexual Exploitation and Sexual Abuse (Lanzarote Convention) dictates some provisions for the adaptation of the internal legal system aimed at modifying the penal code (introducing the new crimes of solicitation of minors, including through the Internet, and of incitement and apology of practices of paedophilia and child pornography), the code of criminal procedure and the penitentiary system. We recall in particular that, according to art. 609-quater of the Criminal Code, those who commit sexual acts with minors under the age of 14 are punished, as well as with minors under the age of 16 when the guilty party is the ascendant, the parent, including adoptive parent, or the parent's partner, the guardian or other person to whom, for reasons of care, education, instruction, supervision or custody, the minor is entrusted or who has, with the latter, a cohabitation relationship. Furthermore, outside the cases of sexual violence (referred to in Article 609-bis of the Criminal Code), the ascendant, the parent, including adoptive parent, or his partner, or the guardian who, by abusing the powers connected to his position, commits sexual acts with a minor who has reached the age of sixteen, is punished with imprisonment from three to six years. However, a minor who commits sexual acts with a minor who has reached the age of 13 is not punishable, if the age difference between the subjects is not greater than three years.

³Witnessed violence is a form of child abuse, generally defined by scientific literature as the exposure of the child to physical and/or psychological violence, carried out by a family member on one or more significant reference figures (usually the mother or siblings). Law 19/07/2019 n.69 "Amendments to the Criminal Code, the Code of Criminal Procedure and other provisions on the protection of victims of domestic and gender-based violence" called "RED CODE", came into force on 09 August 2019. **The** main innovation introduced with reference to the fight against witnessed violence is the express provision, within art. 572 of the Criminal Code, that the minor who witnesses the abuse is always the person injured by the crime.

- consensual sexual activity with a minor who is over the age of legal consent in the country where it occurs, but under the age of 18 (even if it is not a crime), will still be treated as a violation of this Policy and the Code of Conduct.

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 socio-emotional development. Includes, but is not limited to, child labor.



Policy Statement

This Child Protection Policy :

- considers the prevention, protection and promotion of children's rights a priority;
- considers the protection of privacy as a regulatory requirement and as a quality standard in potentially encountered situations;
- promotes, in the implementation of services and projects, a kind, respectful, balanced approach, inspired by the right closeness towards users, minors and not only;
- assumes respect for the rights of the people involved in its activities, collaborators and collaborators as a preliminary dimension;
- respects points of view, voices, needs and facilitates their emergence in a concrete, functional, non-invasive, protective advocacy key, in order to enhance autonomous activation and not infringe any individual rights;
- promotes the well-being of girls and boys in all professional contexts in which Coop Luogo Comune is involved;
- also firmly combats gender-based violence online, promoting a safe and inclusive digital environment for all collaborators, partners and users. Online gender-based violence includes acts such as harassment, intimidation, non-consensual dissemination of personal information or images and hate speech based on gender identity. It takes rigorous measures to identify, prevent and respond to such behaviors, including monitoring platforms and promoting educational campaigns to raise awareness of this issue. It encourages collaborators, partners and users to report any incidents of gender-based violence even when expressed online and ensures a rapid, confidential and effective process for managing reports
- promotes the principles of the Policy itself to its partners, stakeholders and clients.



Common Place Commitment (LC) in the protection of minors

Child Protection Policy represents the commitment to protect and promote the well-being of children who come into contact with the Coop directly or indirectly.

The Policy is intended to:

- strengthen the organization's capacity to prevent and respond with concrete actions to problems related to child protection;
- increase awareness and knowledge of all matters relating to child protection within the Board of Directors , among its staff, interns, private and public partners and in the communities in which LC operates.

The Policy defines standards of professional behavior and procedures to ensure that no child is harmed during the provision of services and activities.

This occurs through four main areas:

Awareness raising : LC is committed to ensuring that its staff, trainees, representatives and staff of partner organisations are aware of the issues of sexual abuse and exploitation and the risks to children associated with them. Within the projects supported and through the partners involved, children and their families will be made aware, in the most appropriate ways, of the rules of conduct they can expect from professionals and representatives and how they can, if necessary, report suspected abuse.

Prevention : LC is committed to ensuring that its employees, trainees, representatives and staff of partner organisations minimise risks in order to prevent any harm to children. An environment shall be created in which children's rights are always protected and possible abuses are prevented.

Reporting : LC is committed to ensuring that its staff, interns, representatives and staff of partner organisations are clear about when to report a suspicion of possible abuse and what action to take.

Response : LC is committed to ensuring effective intervention in response to every report of abuse by supporting, safeguarding and protecting the child involved.

Procedure

Awareness and prevention

LC ensures that the Policy, the related procedure and the code of ethics are widely disseminated both internally and in the community in which it operates, particularly among children, adolescents and those who care for them.

Dissemination is managed to ensure that the Policy and the Code of Ethics are fully understood; this may include the use of translations into the language of the beneficiaries and the production of child-friendly materials.

Partner organizations must adopt this Policy or have developed their own that have a similar approach and standards.

Partner agreements must clearly outline agreed upon procedures for reporting and investigating incidents of Policy violations.

The involvement of children, girls and adolescents for purposes related to communication/media and advocacy activities must always take place with informed consent.

It is advisable, where possible, to avoid their identification, in particular by comparing personal details, where they are located and their image.

LC is committed and engages its staff in:

- protect the child and provide all the support he/she needs within his/her competence by facilitating external support processes;
- protect and support the child's reference context if not directly involved;
- protect the person who discovered the abuse;
- avoid any contact between the person accused of abuse and the children involved;
- take appropriate measures on the basis of the decision of the competent Authorities.

Recruitment

The recruitment of other staff and interns must reflect LC's commitment to the protection of children and adolescents, ensuring that communications, controls and procedures are in place that are consistent with this commitment.

Selected candidates are advised of the binding nature of this Policy, the related procedure and the code of ethics and that these apply to both professional and private life.

The initial selection is structured in an introductory interview, always conducted by a senior figure of LC, aimed at examining the curriculum vitae and qualifications held and previous professional experiences if present.

The selected profile, initially, works alongside expert collaborators for an agreed period and is placed in contexts that can assess their approach and competence, and their compliance with the professional and ethical needs required.

After a phase of accompaniment/support, he/she is inserted into the LC training plans and consequently and/or in parallel inserted into the workplace.

Periodically, each professional and collaborator participates in teams for the planning and monitoring of interventions, also in order to evaluate the activities carried out by the various actors.

Teamwork, in addition to being a basic model of intervention in the various services in which LC operates, also represents a form of capacity building, in which there is a strong protection for the institution, its users, and its own collaborators.

Training

LC staff periodically participates in training activities aimed at acquiring updates on national and international policies on the issues of girls' rights and on the issues of the Policy.

LC promotes specialized training on the issues of abuse and mistreatment in relation to the types of projects and initiatives activated, internally and externally, promoting and raising awareness of the issues of the Policy towards the territory, in a local, regional, national, community and international dimension.

Reporting and response

The protection and reporting procedures and the guiding principles are briefly proposed here:

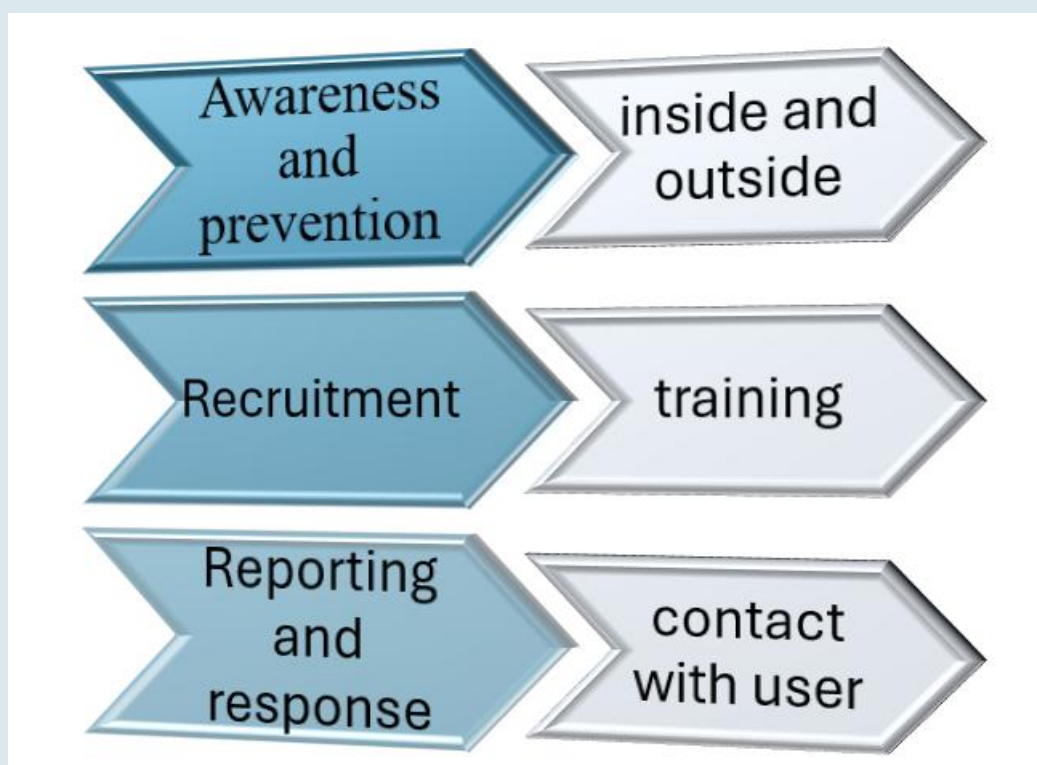
- all projects and interventions are committed to informing children about their rights and to safeguarding and protecting them from potentially critical situations;
- all projects and interventions support and promote a culture of non-violence from all points of view and manifestations, defining them as unacceptable, in any case;
- all projects and interventions are committed to informing children about their rights and to safeguarding and protecting them from potentially critical situations;
- all projects and interventions support and promote a culture of non-violence from all points of view and manifestations, defining them as unacceptable, in any case;
- children are duly equipped and equipped to be the primary protagonists in the process of protection, disclosure and reporting;
- all procedures that directly involve children are duly described in simple and understandable language;
- each LC member is committed to promoting himself as a reference adult and acting accordingly;
- the report of suspected abuse must be addressed to the Board of Directors in writing, by sending an email to gestione.luogocomune@gmail.com, which will inform the competent Authorities after an initial assessment

A report is defined, directly or in support of other bodies/clients depending on the specific competence, in the following situations:

- detection and evaluation of any abuse, whether suspected or confirmed;
- if an employee directly witnesses and/or suspects a potential prejudicial situation;
- if an employee receives a report from partners and external collaborators;
- if a collaborator receives, directly or indirectly, direct testimony, narration from a child.

In the event that a child discloses a situation of prejudice and/or abuse within the definitions in this Policy, the following must be respected:

- respond to a principle of confidentiality and maximum seriousness and consideration of what is received;
- a professional, if not directly involved, must be called urgently to help the child explain the facts;
- Board of Directors must be informed immediately ;
- the child must be listened to with respect for his/her time, his/her developmental age, the context of reference, his/her cognitive, linguistic, relational and social skills;
the child must be informed about the use of testimony in subsequent phases.



This Policy is disseminated in the various communication channels of the Cooperativa Luogo Comune.

It is attached to each assignment letter

It constitutes an appendix to the service charter of the various projects

It is included in the attachment to each collaboration agreement with private and public partner entities

Responsible for drafting, implementing and disseminating the Policy:
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Subject to updates and revisions every two years or whenever necessary

February 2025

