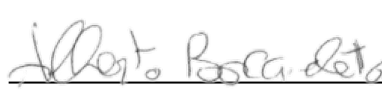



# CHILD PROTECTION POLICY

*Annex to the Procedure for the protection of Users who benefit from the services, their family members and third parties*

Rev. n°:	0	of:	04/04/2022
Rev. n°:	1	of:	29/11/2023

Treviso, 29/11/2023

  SIGNATURE  
\_\_\_\_\_  
The President

## **1. VALUES, PRINCIPLES, METHOD AND PLANNING OF LA ESSE S.C.S.**

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La Esse bases its identity on promoting projects aimed at social change that are generated by the territory and in the territory, in the general support of community development, in human promotion and active citizenship through the management of socio-educational services.

La Esse operates transversally in the context of local welfare systems according to an approach of promotion of empowerment and community development in the areas described below. The work is characterized by an approach to social life (of the individual, groups and communities) based on the idea that change can be activated in a context that allows the emergence and connection on the problems, needs, desires, resources of the individual, groups and communities. This process is developed through the comparison, mutual influence and decision on actions aimed at changing situations, the implementation and evaluation of these change actions. Therefore, La Esse promotes projects that aim to develop democracy from below in everyday micro-contexts, such as: schools (of any order and level), associations, aggregation centers, parishes, local communities, neighborhoods through educational interventions and research-action processes. It stands out in pursuing the promotion of active citizenship in all contexts in which people live and interact, through the promotion of meeting spaces, the strengthening of ties between people, the activation of groups as active subjects in changing their living conditions and those of the community.

### **PATHS TO COMBAT GENDER-BASED VIOLENCE**

The Cooperative promotes empowerment paths for women victims of violence, offering legal and psychological advice, educational, employment and housing accompaniment, as well as initiatives aimed at recognising, preventing and combating gender-based violence.

### **GENDER EQUALITY**

La Esse operates with a view to overcoming the disparities between women and men present in many areas of life and society and to stimulate cultural, social and relationship change; this through the implementation of awareness-raising events, seminars and workshops in the territories and through the direct management of branches.

### **RECEPTION AND INCLUSION OF MIGRANTS, VICTIMS OF TRAFFICKING AND LABOUR EXPLOITATION**

Housing reception and integration projects for migrants, victims of trafficking and labour exploitation are promoted and managed, enhancing and supporting everyone's life project in a logic of active inclusion in the local communities, autonomy and escape from the condition of need.

### **SOCIAL HOUSING**

Alternative services to the real estate market are offered to those who are excluded for reasons of income from access to public housing and at the same time unable to bear the costs of the free market. The people and families who use the apartments are included in projects managed by us in agreement with local authorities and administrations in the design of specific interventions for households and individuals in housing difficulty.

## **WORK**

Through the accreditations of Employment Services, Higher Education and Continuing Education with the Veneto Region, La Esse has used its experience to develop specific projects of orientation and accompaniment to job placement. Intended for different targets such as young people, women, people with marginalized profiles, NEETs and migrants.

## **SCHOOL**

Interventions in schools have historically represented an area of strong investment for the Cooperative. This sector has continued to modulate and differentiate its operational practice according to the emerging needs of students, teachers and parents, remaining adherent to its vision of intervention in the school: not so much a specialized service, but an opportunity to build new opportunities for the entire educating community, structuring educational moments that concern relationships, learning processes, and expectations towards education. In this sense, the work was oriented towards co-constructing motivational contexts capable of supporting the development of "cognitive and non-cognitive skills" of the minor, an integral part of the broader socio-educational context and to promote the collaboration of the school with Local Authorities, the Third Sector and civil society. We also intervene in the classroom with training and awareness-raising courses on the issues of affectivity-sexuality, equal opportunities and non-discrimination, orientation to choice, and the conscious use of the web.

## **SUPPORT FOR MINORS AND FAMILIES**

The Cooperative has always operated in the design and management of services for children, adolescents and families. We work to ensure the presence in the territories of educational and support spaces for families and minors in their life context, contributing with other institutional and local community subjects to the fight against all forms of educational poverty.

## **YOUTH POLICIES**

The Cooperative is committed to activating projects aimed at promoting youth autonomy through the creation of active citizenship paths in the various territories of reference. We meet children and young people in informal contexts, on the street, in laboratories or in aggregative spaces to develop meaningful contacts and relationships, increase opportunities for knowledge and experimentation around common passions.

## **TRAINING AND CONSULTING**

Training is understood as a learning process that is activated with the people involved and where the group dimension plays a key role in defining training objectives and contents, in a logic of participation, self-promotion, collaboration, shared responsibility and in line with a co-constructive conception of skills and knowledge.

## **2. PURPOSE AND SCOPE OF THE CHILD PROTECTION POLICY**

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### **PURPOSE**

- protect children and young people who receive the services of La Esse Social Cooperative from potential harm, including the children of adults who use our services;
- provide La Esse staff and any volunteers, as well as children and young people and their families, with the general principles that guide the approach to child protection.

This policy applies:

- to minors involved in any activity and project;
- to staff, hired with contracts of any kind (managers, member and non-member workers, trainees) and any volunteers;
- to the staff and representatives of the partner organizations and to any other individual, group or organization that has a formal/contractual relationship with La Esse s.c.s. and that involves direct contact with minors;
- consultants and suppliers.

### **LEGAL FRAMEWORK**

This document has been prepared in accordance with the principles of the UN Convention on the Rights of the Child (CRC) and the International Conventions concerning minors transposed into law by the Italian Republic.

La Esse s.c.s. is committed to guaranteeing the right of minors to protection and also recalls the four cardinal principles expressed in the same: the right to non-discrimination (art.2), respect for the best interests of the child (art.3), the right to life, survival and proper development (art.6) and the right to be heard (art.12).

As far as the protection of personal data is concerned, the regulatory framework of reference is the European Regulation EU 2016/679 and Legislative Decree 30 June 2003 n.196 as amended by Legislative Decree 101/2018. With regard to health and safety in the workplace, Legislative Decree 81/2008.

Finally, the guiding legislation in the management of the Organizational Model in which this document is included is Legislative Decree no. 231 of 8 June 2001.

### **ORGANIZATIONAL CONTEXT OF REFERENCE AND SUPPORTING DOCUMENTATION**

This document has been drawn up within the framework of the Organizational Model pursuant to Legislative Decree 231/01 adopted by La Esse s.c.s. and, therefore, is integrated with the content of all the other documents and procedures drawn up, in particular:

- The procedure for the Protection of Users, of which it is an Annex and an integral part;
- The Code of Ethics;
- The descriptive document of MOG 231, with the respective annexes: crime risk analysis documents; Disciplinary Code; Vademecum of relations with the contracting authority and with public officials;
- The Disciplinary and Sanctioning Regulations.

Finally, with regard to the procedures for the protection of personal data, the Privacy Manual and Register of Processing Operations should be considered.

### **3. BASICS**

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#### **WE BELIEVE THAT:**

- Children and young people should never be abused of any kind;
- We have a responsibility to promote the well-being of all children and young people, to keep them safe and to work in a way that protects them.

#### **WE ACKNOWLEDGE THAT:**

- The well-being of children is fundamental in all the work we do and in all the decisions we make;
- Working in partnership with children, young people, their parents, guardians is essential to promote the well-being of young people;
- All children, regardless of age, disability, gender, race, religion or belief, sex or sexual orientation, have an equal right to protection from harm or abuse;
- Some children are more vulnerable due to the impact of previous experiences.

#### **WE PROTECT CHILDREN AND YOUNG PEOPLE:**

- valuing them, listening to them and respecting them;
- appointing a designated person responsible for the protection of children and adolescents;
- adopting defined procedures and a code of conduct for staff and volunteers;
- providing effective management of staff and volunteers through supervision, support, training measures;
- recruiting and selecting staff and volunteers with adequate attention;
- recording, storing and using information in a professional and secure manner, in line with legislation and data protection guidelines;
- sharing information on safeguarding and good practices with children and their families through social media communication, group work and individual discussions;
- making sure that children, young people and their families know where to turn for help in case of concern;
- creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure that will help us deal effectively with any incidents;
- ensuring that we have effective reporting measures in place;
- ensuring a safe physical environment for children, young people, staff and volunteers, through legally required health and safety measures;
- building a culture of safeguarding in which staff and volunteers, children, young people and their families, treat each other with respect and feel comfortable sharing concerns.

## **4. IMPLEMENTATION OF THE POLICY**

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### **DISSEMINATION AND AWARENESS RAISING**

This Policy is published on the company website and drive; the principles that compose it are shared by the Management, Coordinations and operators and are applied in the services and requested as a quality standard from the partners. The collective and participatory context of the team is a guarantee of exchange and comparison in the face of problematic situations on the subject, which can be addressed jointly and on which it is possible to activate special supervision.

The staff implements the most appropriate educational methods so that minors are aware of their rights and know that they can count on relationships of trust with the operators, if they experience situations of hardship or particular problems.

### **SELECTION AND MONITORING OF PERSONNEL TO BE ASSIGNED TO PROJECTS IN CONTACT WITH MINORS**

The staff to be assigned to projects in contact with minors is carefully selected by the Human Resources Office, both from among the staff in force and externally for the purpose of a new recruitment.

In particular, the following are evaluated: the motivation to work on issues related to childhood and adolescence; the attitude to respect the rights of children and adolescents; understanding the material and emotional needs of children and adolescents in local contexts; the willingness to comply with the policy to protect minors. Before assigning staff to projects with minors, it is verified that their status is free from criminal convictions or pending charges, through the request for the "Criminal Record" Certificate as required by current legislation.

During the project, the professional activity carried out by each worker is monitored by the Project Coordinator and the Human Resources Office. The Coordinator assessed the goodness of the activity carried out also through the feedback of users and institutional interlocutors relating to the project.

Failure to comply with this Policy constitutes a disciplinary violation and will result in the opening of the relevant proceedings.

### **INFORMATION, TRAINING AND SUPERVISION ACTIVITIES**

Through coordination and teamwork, we are constantly informed and updated on the good practices to be followed in working with families and minors, with particular attention to fragile contexts. We are working in this sense with the institutional network, first and foremost the territorial social services. There is the possibility of being supervised by professionals in the field.

In addition, training and awareness-raising meetings relating to work with minors are periodically organised, with the aim of increasingly implementing the intentions and actions set out in this Policy in day-to-day operations.

### **DATA, COMMUNICATIONS AND IMAGES RELATING TO MINORS**

La Esse staff has received instructions through special Vademecum and Disciplinary so that communications and the creation of images relating to minors do not violate their dignity and do not put them at risk.

In particular, it is provided that:

- the parent, or guardian, and the minor himself receive specific information about the processing of data and images concerning the minor;
- any form of dissemination of images from which minors in charge of the services are identifiable as victims of violence, exploitation, abuse or who, in any case, are in some way, particularly vulnerable, are avoided;
- it must be respectful of the dignity of boys and girls portrayed in photos and videos, which must always and in any case be appropriate to the context and age of the minor;
- data and images relating to minors should be stored exclusively in the company drive;
- data and images must be processed in compliance with all the appropriate security rules provided by the organization, and described in the Privacy Manual and Register of Processing.

La Esse shares these rules with its project partners.

### **CHILD AND ADOLESCENT PROTECTION OFFICER**

La Esse appoints a Child and Adolescent Protection Officer to ensure compliance with this Policy.

The Child and Adolescent Protection Officer must be chosen from within the organization from among those who possess the professional skills to ensure the application and compliance with the principles expressed in this document, as well as the supervision of the correct implementation of the contents of the same. This figure is the point of reference for collecting and managing reports and critical issues in this field, in order to safeguard minors from any risk of exploitation, abuse or harassment.

As part of the Organisational Model referred to in Legislative Decree 231/2001, the Manager must also discuss reports and critical issues with the Supervisory Body (SB) set up in the Cooperative.

In the internal organisational context, the Manager is considered to coincide with the figure already established internally by the CSR, Head of the Integrated Security and Privacy System and Internal Contact for MOG 231, since this figure already contributes to the assessment of risks from crime, health and safety, data protection and already maintains the flow of communication with the Supervisory Body and with the other significant figures of the cooperative: Board of Directors, Human Resources and Utilities Office, Coordinators and operators.

### **REPORTING SITUATIONS OF RISK FOR MINORS**

In cases where in the performance of his or her work, a La Esse operator identifies a risk of prejudice to the child (physical or emotional neglect, failure to respond to needs, mistreatment, abuse, etc.), he or she must report what he or she has observed to the Coordinator without delay. The Coordinator promptly connects to the Head of Child and Adolescent Protection (RSI within La Esse) in order to involve any public client and the Supervisory Body in the management of the case, which may lead to the activation of various tools, such as the intervention of the Public Security authorities (Carabinieri and Police), reporting to the Juvenile Court, the summons of the family by social services.

In those particularly dangerous situations that require timely intervention, the operator contacts the Public Security authorities directly.

In the report on the incident, prepared for the public services in charge, it is necessary to tell the facts objectively and as circumstantially and in detail as possible, avoiding personal assessments.

It is possible that the operator is called upon to report on the facts of which he is aware or to which he has

witnessed directly, even during the investigations and in the trial phase. In any case, the operator has the obligation to declare the truth.

## **CODE OF CONDUCT**

La Esse staff, collaborators, volunteers/trainees, staff of partner organizations and their representatives must comply with La Esse's Code of Ethics and **the Procedure for the Protection of Users Who Benefit from the Services, their Family Members and Third Parties, to which this Policy is attached.**

It is clear from the above-mentioned documents that adequate, professional, respectful and protective conduct must be maintained towards minors and that inappropriate or potentially abusive behaviour and actions must be avoided.

By way of example and not exhaustively, the prohibitions of:

1. Hit, physically assault, or physically or psychologically abuse a minor;
2. Have attitudes towards minors that (also from a psychological point of view) may negatively affect their harmonious and socio-relational development;
3. Engage individuals under the age of 18 in sexual activity or sexual intercourse or behave in a sexually provocative manner or in a manner that could be improperly interpreted as such;
4. Act in ways that may put minors at risk of exploitation, mistreatment or abuse, including work or other services that involve exploitation, or even a simple degradation of image, including begging;
5. Use incorrect, vulgar, offensive language with minors;
6. Directly or indirectly create, distribute, disseminate or advertise pornographic material by any means, including electronically; possess, on a non-professional basis, child pornography material or act in such a way as to induce or encourage the involvement of minors in the creation of such images;
7. Establish or maintain contacts with minors who are beneficiaries of the services, except for objectives related to the projects, using communication tools and online environments of which the organization is not aware;
8. Giving money, goods or other benefits to a minor, outside the parameters and purposes established by the project activities in place;
9. Tolerate or participate in behavior by minors that is illegal, abusive, or endangers their safety;
10. Discrediting or discriminating against minors in relation to specific physical, cognitive or sex-related characteristics, ethnicity of origin, religious beliefs.

On the contrary, again by way of example and not exhaustively, it is required that the staff of the Cooperative, collaborators, volunteers/trainees, staff of partner organizations and their representatives in contact with minors:

1. respect the rights of minors and treat them fairly, honestly and with dignity and respect;
2. are careful in identifying situations that may involve danger or harm to minors and report them;
3. organize work and the workplace in such a way as to eliminate and/or minimize dangers or damage of any kind to minors;
4. guarantee within the services a climate of listening, acceptance and self-expression that allows any issue and problem to be expressed and shared.



5. enhance the skills and competences of minors in acquiring awareness about their rights, so that they can exercise their capacity for self-determination and self-protection.

## **5. CONTACT DETAILS**

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**Designated Child Protection Officer of La Esse:**

For the above assessments, the Head of Child and Adolescent Protection coincides with the Head of the Integrated Security and Privacy System and MOG 231 Contact Person of La Esse s.c.s., i.e.

**Name: Agata Daniela**

**Surname: Porto**

**Phone: 3929676792**

**Mail: [aporto@laesse.org](mailto:aporto@laesse.org); [sicurezza@laesse.org](mailto:sicurezza@laesse.org); [privacy@laesse.org](mailto:privacy@laesse.org)**

It is also possible to contact, for reports, the Supervisory Body referred to in Legislative Decree 231/2001 at the email address: [organodivigilanza@laesse.org](mailto:organodivigilanza@laesse.org)