

PARSEC CHILD SAFEGUARDING POLICY

PARSEC Cooperativa Sociale was founded in June 1996. Since that date, our constant commitment has been to promote interventions and services able to respond, where possible with innovative proposals, to the complexity of emerging social needs, both locally and nationally.

The Cooperative is inspired by a system of interventions, focusing on the principle of subsidiarity and within an investment conception of welfare, expressed through its actions, its character and the public status of its mission.

PARSEC intends to promote the activation of policies to promote well-being and social inclusion, according to universalistic principles and within a conception belonging to local welfare

The actions implemented provide for a multidisciplinary approach that favors the dialogue between the person, his networks of reference, and the cultural and relational context in which he lives and acts.

The interventions that concern minors and their families are also framed in a territorial and generative welfare model, in which every care is shared with the various stakeholders and every educational project is strongly rooted in the territories.

The main areas of intervention are: Residential reception for minors outside the family, MNSA and minors under criminal law; the fight against educational poverty; the promotion of leisure for adolescents and pre-adolescents; associative and business development in the youth sector; support for parenting. In all cases, we mean actions that constantly focus on the development and defense of rights, on social inclusion and the protection of the psycho-physical health of young people and minors.

The fundamental objective of our interventions is to work to ensure that minors have the possibility of full development and well-being while safeguarding their physical, mental and social health.

Ensuring the well-being of children means creating opportunities for a dignified, full and rewarding life: thus offering the opportunity to feed themselves properly, be cared for, receive medical care, carry out recreational, sports and socializing activities appropriate to their age, cultivate their aspirations freely.

It is in consideration of this mandate that Parsec wants to be an organization that protects and respects, in all its actions, the rights of child and young people.

The purpose of this policy statement is:

- to protect children and young people who receive Parsec's service from harm. (This includes the children of adults who use our services);
- to provide staff and volunteers, as well as children and young people and their families, with the general principles that guide our approach child protection.

This policy applies to:

- · minors involved in any activity and project;
- Parsec Staff, hired under any kind of contract (managers, worker members and non-members, volunteers, trainees) at work and in private life;
- the staff and representatives of partner organizations and to any other individual, group or organization that has a formal / contractual relationship with Parsec and that involves direct contact with minors:
- · consultants and suppliers;

This document was drawn up in accordance with the principles of the UN Convention on the Rights of the Child (CRC) and the international conventions concerning child implemented by law by the Italian Republic. For the drafting, all the development areas of the cooperative were consulted.

Parsec undertakes to guarantee the right of minors to protection (art.19 CRC) and also recalls the four key principles expressed in the same: non-discrimination (art.2), protection for the best interests of the minor (art.3), the right to life, survival and development (Article 6), the right to freely express one's opinions (Article 12).

This document is complementary to a series of rules of conduct that all Parsec personnel are required to respect: the Code of Ethics and Conduct, the Anti-Fraud and Anti-Corruption Policy and the procedures of the Model pursuant to Legislative Decree 231/01 adopted by the our organization.

POLICY

We believe that:

- children and young people should never experience abuse 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 recognize that:

- the well-being of children is fundamental in all the work we do and in all the decisions we take:
- working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's well-being;
- all children, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation, have an equal right to protection from any kind of harm or abuse;
- some children are more vulnerable because of the impact of previous experiences. Due to their level of addiction, communication needs or other problems, additional safeguards may be needed to keep them safe from abuse.

We will seek to keep children and young people safe by:

- valuing, listening to and respecting them;
- appointing a nominated child protection lead for children and young people;
- adopting defined procedures and code of conduct for staff and volunteers;
- developing and implementing an effective online security policy and related procedures;
- providing effective management for staff and volunteers through supervision, support, training and quality assurance measures, so that everyone knows and follows our policies, procedures and behaviour codes confidently and competently;
- recruiting and selecting staff and volunteers with the necessary checks;
- recording, storing and using information professionally and securely, in line with data protection legislation and guidelines;
- sharing information on protection and good practices with children and their families through communication on social media, group work and one-to-one discussions;
- making sure that children, young people and their families know where to go for help in case of concern;
- using our procedures to manage any allegations against staff and volunteers appropriately;
- creating and maintaining an anti-bullying environment and making sure we have a policy and procedure to help us deal effectively with an incident that arise;

- making sure we have effective reporting measures;
- Ensuring a safe physical environment for our children, young people, staff and volunteers by applying health and safety measures in accordance with the law;
- 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.

FUNDAMENTAL PRINCIPLES

ZERO TOLERANCE FOR CHILD ABUSE

Parsec does not tolerate any form of child abuse and will not knowingly involve anyone, in any capacity, who may pose a threat to children or adolescents.

NON-DISCRIMINATION

Parsec is committed to safeguarding minors in carrying out their activities, regardless of their nationality, culture, ethnicity, sex, sexual orientation, religious or political belief, socioeconomic status, family or criminal background, state of physical or mental health.

'DO NOT HARM'

Parsec incorporates and maximizes the Do No Harm principle in carrying out its activities. The "Do No Harm" principle requires humanitarian organizations to undertake to minimize, and eliminate when possible, the damage that they may inadvertently cause when providing aid, as well as any damage that may possibly be caused by failure to provide aid.

PARTICIPATION OF MINORS

Every child should be empowered to understand their rights, responsibilities and what to do if they have concerns. Children should be encouraged to make their voices heard to report violations of their rights, without being intimidated.

ACCOUNTABILITY AND TRANSPARENCY

Parsec guarantees the implementation and compliance with the principles expressed in this document, the implementation of which is constantly monitored, the document is therefore reviewed regularly on the basis of the feedback received.

In the event of a report of alleged abuse, Parsec undertakes to promptly take the necessary measures, in compliance with the reporting procedures, and taking care to trace the necessary information. Each complaint is handled with the utmost seriousness and confidentiality.

SHARING OF RESPONSIBILITIES

In the event that the projects or services are carried out by Parsec in collaboration with partner institutions or organizations, which do not have their own policy for the protection of minors, Parsec will ensure that they adhere to this document, respecting the rules expressed here, for all the duration of the intervention.

DATA PROTECTION AND CONFIDENTIALITY

All Parsec personnel are required to maintain confidentiality and to respect the data management processes, such as the collection, storage, transmission and destruction of data as regular by the GDPR 670/2016. The sharing of information may still be necessary if it is in the interest of the individual or if it is required by the law.

STRENGTHENING CAPABILITIES

In day-to-day work Parsec actively works to strengthen the capacities of families and communities, teachers, health and social workers, medical staff and others in contact with vulnerable children and adults, including capacity building for a timely recognition of abusive behavior, and the implementation of appropriate responses.

STAFF CODE OF CONDUCT

The Cooperative adopts a Code of Conduct that describes the appropriate behavior that its collaborators and partners must adopt. The Code of Conduct is strategic to ensure the well-being and safety of child and joung people that Parsec welcomes in its services. Compliance with this Code of Conduct is required of workers in work contexts and in all other contexts in which incompatibility with the culture and policies (Policy) of which Parsec is the bearer may be highlighted. Therefore all workers must avoid:

- 1. Hitting, physically assaulting or physically or psychologically abusing a minor;
- 2. Having attitudes towards minors who (also from a psychological point of view) they can negatively influence their harmonic and socio-relational development;
- 3. To act with behaviors that are a negative example for minors;
- 4. Having relations with minors that can in some way be considered as exploitation, mistreatment or abuse, even if only in implicit or merely evocative forms;
- 5. Engaging in sexual activities (of any type and intensity, even in purely virtual or evocative forms) or having sexual intercourse with individuals under the age of 18 (or with adults who are not consenting and able to express full consent) regardless of the definition of the age of majority or the methods of consent legally recognized in the various countries. An erroneous belief regarding the age of a minor is not to be considered an acceptable defense;
- 6. Acting in ways that may be inadequate, harmful or that may constitute abuse or that may put minors at risk of exploitation, mistreatment or abuse, including work or other services that involve their exploitation, or even simple degradation of image, including begging or sexual solicitation even if only in purely evocative forms;
- 7. Use unfair, vulgar, offensive language with minors, give inappropriate, offensive or abusive suggestions or advice;
- 8. Behaving in an inappropriate or sexually provocative way or in a way that can be improperly interpreted in that sense;
- 9. Directly or indirectly create, distribute, disseminate or advertise by any means, including telematically, pornographic material, implicit or explicit, even if only virtual; hold child pornography material on a non-professional basis or act in such a way as to induce or encourage the involvement of minors in the creation of such images;
- 10. Establish or maintain contacts with minors who are beneficiaries of professional activities, or in the context of another official mandate, if not for purposes related to the same activities, using personal online communication tools (e-mail, chat, social network, etc.). Only online tools and environments of which the organization is aware will be used, preferably a fixed telephone line and mobile phone service for telephone contacts;
- 11. Allow one or more minors with whom you have professional contacts to sleep in your home without supervision and prior authorization from your direct manager, or from the judicial authority, except in exceptional circumstances;
- 12. Sleeping in the same room or in the same bed with a minor with whom you work in the reception facilities, except for needs arising from the organization of work authorized by the

managers, or other documented exceptional circumstances, while still ensuring visibility with respect to third parties as possible;

- 13. Adopt care behaviors (eg hygiene practices) that do not respect the levels of autonomy and integrity of the minor;
- 14. Giving money or goods or other benefits to a minor outside the parameters and purposes established by the project activities or without the direct manager of the work being aware of it;
- 15. Tolerate or participate in behavior with minors that is illegal or offensive or that jeopardizes their safety;
- 16. Acting in a way that shames, humiliates, belittles or despises a minor or perpetrates any other form of emotional abuse;
- 17. Discriminate, or vice versa, privilege or favor some minors while excluding others for reasons of prejudice.

This list is not exhaustive or exclusive. The basic principle is that behaviors and actions that could be inappropriate or potentially abusive towards minors must be avoided.

It is also required that all workers:

- 18. They are vigilant in identifying situations that may cause dangers or damage to minors and know how to anticipate and manage them, in the forms and methods permitted by law;
- 19. Report any information of reasonable suspicion about a possible abuse or mistreatment of a minor pertaining to their professional activities to the competent judicial authorities and / or competent institutions in the cases provided for by the Law and, in the remaining cases, by activating the procedures provided for in this document of Child Safeguarding Policy;
- 20. Organize the work and the workplace in such a way as to cancel and / or minimize foreseeable dangers or damages of any nature for operators and users, with scrupulous application of the regulations in force regarding safety in the workplace;
- 21. Are as far as possible visible or accessible to other adults, while working with minors;
- 22. Ensure the dissemination and maintenance of a culture of openness that allows staff, volunteers, minors and those who take care of them to raise and discuss all kinds of issues and concerns with ease;
- 23. Ensure that staff members develop a sense of responsibility for their actions so that inappropriate or abusive actions and behaviors towards minors do not go unnoticed or tolerated;
- 24. Communicate to minors what kind of relationship they should expect to have with staff or whoever represents them and facilitate the reporting of any kind of concern or discomfort;
- 25. Enhance the skills and competences of minors and discuss with them their rights, what is acceptable and what is not and what they can do if any problem arises;
- 27. Respect the rights of minors and treat them fairly, honestly and with dignity and respect;
- 28. Promote the participation of minors so as to develop their capacity for self-protection.

THE PROTECTION OF MINORS

The Policy is based on internationally recognized fundamental elements, described below.

Awareness raising

All staff, volunteers, as well as suppliers, beneficiary communities and their representatives, are made aware of this document, and of the reporting procedures for any abuses perpetrated against minors. Each employee or collaborator receives this document at the time of signing the contract with the Organization.

Recruitment

In recruiting new personnel, Parsec evaluates:

- motivation to work on issues relating 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;
- knowledge of international debates on sensitive issues;
- values such as honesty, non-discrimination, reliability and loyalty;
- · references.

As required by Article 25 bis of Legislative Decree 39/2014, a criminal record is required for each new employee who works directly with minors. Interviews with candidates include appropriate questions about safeguarding children;

Job advertisements, job descriptions, terms of reference, guidance materials, contracts and employment agreements for new workers include the responsibility to comply with Parsec policies including the child protection policy.

Training and supervision

In order to adequately implement the Policy, all new staff and volunteers will be informed about the child protection policy and their responsibilities towards the protection of children.

Staff and volunteers also have the opportunity to have regular updates on child protection, both formally, for example through training or supervision, and more informally, for example through discussions during group meetings.

Each service is regularly supervised to support workers and to enable them to carry out their duties appropriately and professionally.

Child safety risk assessment and management

While it is not possible to completely eliminate all risks to minors, Parsec is committed to minimizing these risks and implementing best practices. Before starting and throughout their cycle, projects are evaluated and monitored to ensure that all activities are in line with the fundamental principles expressed in this document. Systematically identifying and assessing the risk associated with services, projects, and activities minimizes the chances of harm occurring. Parsec also adopts proactive measures at every stage of the

implementation of its projects to avoid causing damage inadvertently, while trying to maximize and disseminate the most virtuous practices.

Communication and media

It is important that the creation, collection and dissemination of images portraying minors take into consideration the protection of minors themselves, do not violate their dignity and do not put them in conditions of risk.

In order to minimize any possible risk situation, Parsec personnel are required to:

- respect the privacy of the boys and girls portrayed in photos and videos;
- inform the minor and the parent, or guardian, about the intended use of such images, through the appropriate form prepared by Parsec;
- obscure, do not make a face or in any case make unidentifiable boys and girls who have been subjected to violence, exploitation, who have been abused or are, in some way, particularly vulnerable. Also, their real names must be changed and the change reported. Geographical references of places, houses and streets, which can identify such boys and girls, must also be omitted;
- respect the dignity of boys and girls portrayed in photos and videos;
- do not take and do not use images of boys or girls naked or taken in poses that may appear inappropriate;
- pay particular attention to the use of images with vulnerable subjects (people with disabilities, refugee children, minorities), always ensuring respect for their dignity;
- archive the images and videos in the appropriate Parsec database, access to which is limited to the staff who use them for their work;
- ensure compliance with these behaviors in all work processes;
- be sure to share these rules with partners and ensure that they are respected in all activities for which Parsec is responsible.

Referent for the protection of children and adolescents (Child protection manager)

Parsec appoints a person referent for the protection of children and adolescents to supervise compliance with this document.

The child protection manager is a person appointed within the staff, in possession of the professional skills aimed at ensuring the application and compliance with the principles expressed in this document, as well as the supervision of the correct implementation of the contents of this document. He / she is also able to manage and analyze, in the most appropriate way, the problems relating to safeguarding, situations of exploitation, abuse or harassment, addressing and submitting them also to the "Organismo di vigilanza" (OdV) set up as a cooperative pursuant to L.321 / 01.

At the project level, the project manager will be responsible for ensuring the application of the safeguard policy and procedures. Consequently, the reports must be sent directly to the person in charge of child protection or to the project managers, in the event that it is not possible to contact the person in charge of child protection. However, it is the responsibility of the latter to inform the OdV of the report. If the report arrives first to the Odv, it will promptly inform the child protection officer.

The person in charge of child protection:

- establishes and maintains a centralized reporting system, ensuring management control of cases regarding alleged violations of the Policy;
- establishes and maintains contacts with the Managers of all Parsec projects and services for the Protection of Children and Adolescents;
- regularly checks and updates this Policy, at least every three years or in a shorter time, if deemed necessary.

The procedural actions taken by the person responsible for child protection are carried out, but are not limited to:

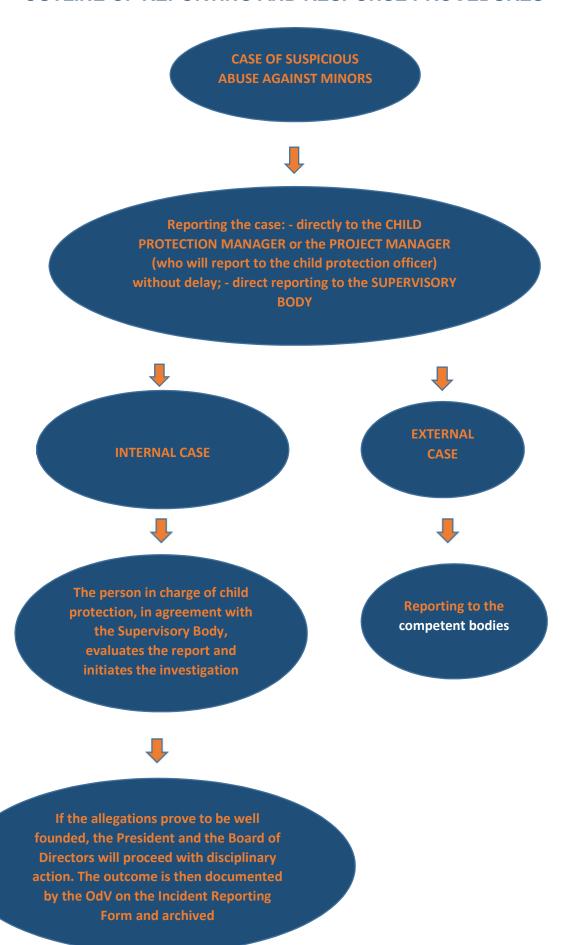
- 1. collect information and documentation on the incident;
- 2. carry out an internal investigation (including interviews with witnesses);
- 3. propose the temporary suspension of the person who is the subject of the report from his or her activities, if related to projects with minors and vulnerable adults, during the course of the investigation;
- 4. inform the person concerned of the reports brought against him;
- 5. give the suspect the opportunity to present his or her version of the events in question, before any determination of guilt or innocence is reached;
- 6. ensure that the victim receives psychological and socio-economic protection and support (if necessary and possibly proportionate);
- 7. ensure that whoever made the report is informed on the progress of the procedure activated:
- 8. where there is a hypothesis of a crime, report the report to the competent authority.

All subjects to whom this Policy applies are obliged to report abuse and no form of coercion, intimidation, retaliation or retaliation against them is tolerated, even in cases where information or assistance is provided in an investigation.

The OdV has general supervision over the implementation and monitoring for this document, for the "Organization, Management and Control Procedures, of the Model ex 231/01", and for the Code of Ethics and Conduct, pursuant to Legislative Decree 231/01.

Therefore, it is up to the OdV in agreement with the person in charge of child protection: to evaluate the reports and to instruct the person in charge of child protection to carry out indepth investigations; inform the Parsec President and the Board of Directors, who will carry out the formal disciplinary proceedings, if the facts reported in the reports are actually found.

OUTLINE OF REPORTING AND RESPONSE PROCEDURES



PARSEC Child Protection manager

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REVISION

The implementation of the safeguard measures and compliance with this policy are constantly monitored. Feedback from staff, communities and stakeholders is highly encouraged in order to improve and consolidate existing procedures.

Parsec Cooperativa sociale's child protection policy is subject to annual review.

CONTACTS

For any questions regarding this policy, please contact us forwarding your request to info@cooperativaparsec.it

Rome, 14/11/2022

The President

(Maura Muneretto)