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**CHILD  
SAFEGUARDING  
POLICY**





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# **Child Safeguarding Policy**



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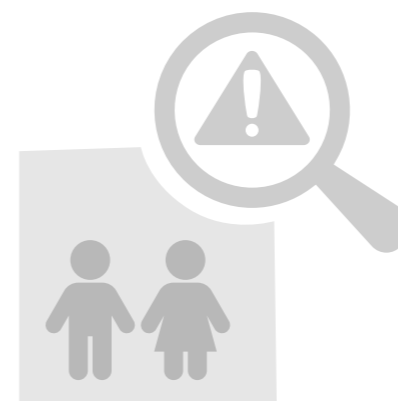
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PH. GIANFRANCO FERRARO

## Foreword

For more than 30 years, Cesvi has been working worldwide to support the most vulnerable populations affected by poverty, wars, natural calamities and environmental disasters. Our experience taught us that even though children are an extraordinary resource for those communities recovering from crisis and poverty, at the same time they are among the most at risk and vulnerable individuals.

As development cooperation and humanitarian workers, we must be able to recognize the risks children are exposed to. We must also be ready to take on our own responsibilities to protect them in emergencies as well as in long-term interventions. That's why we decided to revise and update our safeguarding provisions, starting from those concerning children, so as to comply with the international standards.

The adoption of a Child Safeguarding Policy is for Cesvi the first step to implement a process aiming at minimizing the risk that our intervention or a misbehavior from our staff might cause any episode of violence and abuse against children.

The present Policy comes after a long path started in 2017 when we joined the Keeping Children Safe international network and promoted a participatory process that involved all colleagues on the field and at HQs level. The entire process is strongly endorsed by our Board of Directors.

This document is not an arrival point. It is indeed a further step towards the creation of an organizational culture which states and demonstrates, with growing strength and coherence, that no form of violence against children can be tolerated.

**Daniela Bernacchi**  
*CEO & General Manager of Cesvi*



**Cesvi is an independent secular Italian humanitarian organization, founded in Bergamo in 1985. It operates throughout the world to face up to the worst humanitarian emergencies, fight against poverty and promote human rights and sustainable development by concretely involving the local communities. Cesvi reaches every year about 1 million people in 20 Countries.**

#### MISSION

Cesvi operates worldwide to support the most vulnerable populations in promoting human rights and achieving their ambitions, for sustainable development. Under the ideals of social justice and respect of human rights, Cesvi pursues the well-being of vulnerable populations in condition of poverty or struck by war, natural calamities and environmental disasters. This is achieved, at an international level too, through works of humanitarian aid, in the context of both emergency and development, in support of the weakest categories – children, women, elderly and social outcasts – supporting them in meeting their aims with the objective of promoting self-sufficiency in a sustainable future.

#### VISION

Cesvi believes that the recognition of human rights contributes to the well-being of everyone on the planet, a shared home to be safeguarded.

#### VALUE SYSTEM<sup>1</sup>

Cesvi's conduct is inspired by the maximum integrity and honesty in all circumstances and areas in which it intervenes, both in institutional relations, in relations

with donors and in the respect of beneficiaries' dignity. Furthermore the Foundation undertakes to respect the ethical principles of **legality, correctness, independence-neutrality** and **social responsibility**.

The principle of **legality** dictates compliance with regulations: Cesvi refuses all illicit behaviour even when put into practice with the intention to meet the interests of the Foundation.

The principle of **correctness** implies respect from the recipients of the Ethical Code of the rights of everyone in any way involved with the Foundation's activity. From this point of view the Foundation and all its agencies act in respect of the fundamental human rights avoiding in their relations with counterparts any discrimination based on age, gender, sexual orientation, state of health, race, nationality, political leanings and religious beliefs.

According to the principle of **independence-neutrality**, Cesvi is completely independent from private interests and acts autonomously from governmental policies, aware of its signature social role towards the beneficiaries and the community, preserving its neutrality in the fields of intervention.

## Terms and Definitions

■ **CHILD:** in line with Article 1 of the UN Convention on the Rights of the Child (1989), a child is defined as 'every human being below the age of 18 years'.

■ **SURVIVOR OR VICTIM:** a person who has abuse perpetrated against him/her or an attempt to perpetrate abuse against him/her. For the purposes of these policy persons who report an abuse committed against themselves are treated as survivors for the purposes of security and needs assessments.

■ **COMPLAINANT:** a person who brings an allegation of abuse in accordance with established procedures. This person may be an abuse survivor or another person who is aware of the wrongdoing. Both the survivor and the complainant, if different from the survivor, should be protected from retaliation for reporting abuse. Where there is any conflict of interest between the survivor and another interested party, the survivor's wishes must be the principle consideration in case handling, particularly when there is a risk of additional physical and/or emotional harm.

■ **CHILD SAFEGUARDING:** child safeguarding is the responsibility that organizations have to make sure their staff, operations, and programmes **do no harm**<sup>2</sup> to children, that is that they do not expose children to the risk of harm and abuse, and that any concerns the organization has about children's safety within the communities in which they work, are reported to the appropriate authorities.<sup>3</sup>

■ **VIOLENCE:** "the intentional use of physical force or power, threatened or actual, against oneself, another person, or against a group or community, that either

results in or has a high likelihood of resulting in injury, death, psychological harm, maldevelopment, or deprivation".<sup>4</sup>

■ **CHILD ABUSE:** according to the definition of the World Health Organization the term **child abuse**, sometimes referred also as child maltreatment, is used to describe "all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power".<sup>5</sup> In our understanding, within the broad definition of child abuse we can distinguish a list of subcategories (that is not to be considered exhaustive).

**Physical abuse:** is defined as "the intentional use of physical force against a child that results in – or has a high likelihood of resulting in – harm for the child's health, survival, development or dignity. This includes hitting, beating, kicking, shaking, biting, strangling, scalding, burning, poisoning and suffocating. Much physical violence against children at home is inflicted with the object of punishing".<sup>6</sup>

**Sexual abuse:** is defined as "the involvement of a child in sexual activity that he or she does not fully comprehend, is unable to give informed consent to, or for which the child is not developmentally prepared, or else that violates the laws or social taboos of society. Children can be sexually abused by both adults and other children who are – by virtue of their age or stage of development – in a position of responsibility, trust or power over the victim".<sup>7</sup>

<sup>1</sup> Cesvi (2017), *Ethical Code*, [https://www.cesvi.eu/wp-content/uploads/2018/01/Cesvi\\_Ethical\\_Code\\_2017.pdf](https://www.cesvi.eu/wp-content/uploads/2018/01/Cesvi_Ethical_Code_2017.pdf)

<sup>2</sup> 'Do no harm' refers to organizations' responsibility to 'do no harm' or minimize the harm they may be doing inadvertently as a result of inappropriate programming.

<sup>3</sup> See Keeping Children Safe coalition, <https://www.keepingchildrensafe.org.uk/>

<sup>4</sup> WHO (2002), *World report on violence and health*.

<sup>5</sup> WHO (2006), *Preventing child maltreatment: a guide to taking action and generating evidence*.

<sup>6</sup> *Ibidem*.

<sup>7</sup> *Ibidem*.

**Emotional and psychological abuse:** “it involves both isolated incidents, as well as a pattern of failure over time on the part of a parent or caregiver to provide a developmentally appropriate and supportive environment. Acts in this category may have a high probability of damaging the child’s physical or mental health, or its physical, mental, spiritual, moral or social development. Abuse of this type includes: the restriction of movement; patterns of belittling, blaming, threatening, frightening, discriminating against or ridiculing; and other non-physical forms of rejection or hostile treatment”.<sup>8</sup>

**Neglect:** “includes both isolated incidents, as well as a pattern of failure over time on the part of a parent or

other family member to provide for the development and well-being of the child – where the parent is in a position to do so – in one or more of the following areas:

- health;
- education;
- emotional development;
- nutrition;
- shelter and safe living conditions.”<sup>9</sup>

**Sexual exploitation:** a form of sexual abuse that involves children being engaged in any sexual activity in exchange of remuneration in cash or in kind: the abusive relationship between victim and perpetrator involves an imbalance of power where the victim’s options are limited.

<sup>8</sup> *Ibidem.*

<sup>9</sup> *Ibidem.*

# Introduction

## SCOPE AND RESPONSIBILITIES

A number of Cesvi activities directly or indirectly involve children and young people in different parts of the world. As organization working or in contact with children, Cesvi has the responsibility to make sure that its staff, operations, programmes do no harm to children, and that they do not expose them to the risk of harm and abuse. According to this commitment, Cesvi firmly believes that a Child Safeguarding Policy is necessary to ensure that:

- **Children are protected:** no policy, procedure or standard can offer a complete protection but they can help to minimize the risk of harm for children.
- **Organization staff is protected:** implementing the policy and standards the staff will be clear about how they are expected to behave with children and what to do if there are concerns about the safety of children.
- **The organization and its reputation is protected:** implementing the policy and the standards the organization makes clear its commitment to keeping children safe and it is less vulnerable to false or unfounded accusations related to child protection concerns.

The Policy is principally addressed to all Cesvi employees and personnel included in the following categories:

- board of Directors and Cesvi Management;
- all employees and collaborators working in all Cesvi structures and projects in Italy and abroad;
- non Cesvi entities and their employees and individuals who have entered into a partnership, sub-grant and/or sub-recipients agreement with Cesvi, committees, associations of any sort – including their members and staff – supported, financially or otherwise, by Cesvi in Italy and abroad;
- consultants and other freelances who act on behalf of Cesvi on the basis of service contracts (understood as consultants and providers of intellectual services);

- all persons acting voluntarily on behalf of Cesvi;
- suppliers of any sort of goods, services, or works, including current and potential suppliers;
- all other people not included in the above mentioned categories who have signed a contract with Cesvi.

Hereafter, these are designed as the Policy addressees.

### *Responsibilities*

- Policy addressees must accept and commit to this Child Safeguarding Policy as condition to collaborate with Cesvi. The commitment to adhere to the Policy passes through the signature of the Declaration Form (Annex 1). Cesvi Child Safeguarding Policy shall be made available to all Policy addressees;
- Policy addressees are required to respect this Policy throughout the daily conduct of the Foundation. Violations of the provisions contained in the present Policy by the addressees are considered grave shortcoming on the recipients part and might constitute reason for dissolution of the contractual relationship. In any case, the decision will be determined by an internal analysis, case by case, during which the compliance with the regulations concerning the employment relationship, the provisions of national law and the criteria of privacy and confidentiality will always be ensured. In the event that a complaint to the judicial authorities is necessary, the terms of the law in force will be applied;
- Cesvi Management, among the others, is expected to create and maintain an environment that promotes child safeguarding. The members of Cesvi Management must be familiar with and enforce this Policy, being proactive in overseeing their teams;



- Control of the application of the Child Safeguarding Policy is entrusted to the Child Safeguarding Focal Point HQ-based, i.e. Child Protection Officer.

Humanitarian workers are expected to uphold the highest standards of personal and professional conduct at all times to protect beneficiaries. **The principles set forth in this policy apply all times, during and outside the office hours and during the periods of leave, with no exceptions.**

## POLICY STATEMENT

Violence against children is a violation of Cesvi Ethical Code and Cesvi Code of Conduct.

Cesvi strongly condemns all forms of violence against children and states that no violence against children is justifiable in any circumstance.

Cesvi commits to do all the needful for preventing programmes having any negative effect on children. Cesvi takes all the complaints and concerns about violence against children seriously and it initiates rigorous investigation of complaints indicating a possible violation of this Policy as well as of Cesvi Code of Conduct and of Cesvi Ethical Code.

This policy complements, without replacing:

- Cesvi Ethical Code
- Cesvi Staff Code of Conduct
- Cesvi PSEA Policy
- Cesvi Policy on the Use of Images of Children and Young People
- Human Resources Policy

## PRINCIPLES UNDERPINNING SAFEGUARDING POLICY

Cesvi Child Safeguarding Policy is based on the International Convention of the Rights of the Child (UNCRC) and its 4 funding principles - non-discrimination (art. 2), best interest of the child (art. 3), life, survival and development (art. 6), participation (art.12) – and CRC optional protocols.

Thus, Cesvi Safeguarding Policy is ruled by the following principles:<sup>10</sup>

- All children have equal rights to protection from harm, regardless of their gender, nationality, age,

religious or political beliefs, family background, economic status, legal status, ability, physical or mental health;

- All actions on child safeguarding are taken in the best interests of the child, which is paramount. A best interest assessment has always to be made by the staff in charge of the evaluation of the child protection concerns;
- The point of view of the children must be always taken seriously into account because effective protection can be achieved through listening to the children and creating the conditions for the child to be informed about his/her right to be heard and to freely express his/her point of view;
- Everybody has the responsibility to support the protection of children according to their role and responsibilities within the organization;
- All child protection concerns shall be addressed ensuring transparency and confidentiality. These are guaranteed by standardised case management procedures and by protecting the privacy and the personal data of the people involved, unless data transfer is necessary to protect children.

This document is also based on the following documents:

- Cesvi Ethical Code which specifies the mission, values and ethical code of the organization;
- Keeping Children Safe – *International Child Safeguarding Standards*;
- the *Core Humanitarian Standards*, together with the *Child Protection Minimum Standards*;
- all child-related UN conventions and declarations;
- 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, 25th April 2007;
- Italian national child protection legislation;
- General Data Protection Regulation (EU) 2016/679 ("GDPR").

## COMMITMENTS

Cesvi Child Safeguarding Policy represents the commitment of Cesvi toward the protection and the pro-

motion of the well-being of children that come into contact with the organization, directly or indirectly.

The Policy is meant to:

- strengthen the capacity of the organization to prevent and respond to any child protection concerns with concrete actions;
- increase the awareness and understanding among its own staff and related personnel and the communities in which it operates about all child safeguarding concerns.

The creation of a safe organization for children goes far beyond the development of policies and procedures. Therefore, Cesvi commits to mainstream child safeguarding in its organizational culture and practice. Prevention therefore becomes inherent in our way of working, stimulating debate on the topic, providing training, actively involving stakeholders – above all children – and constantly monitoring and evaluating

our processes.

The Policy defines the highest standards of professional behaviour and procedure to ensure that no children can be harmed while implementing programmes and activities.

Cesvi commitment to child safeguarding is defined through 4 main areas:

**Awareness:** we ensure that all staff and associates, as well as communities and children are aware of the problem of child abuse;

**Prevention:** we ensure to minimize the risk for children through safe recruitment, education and training of staff and of associates;

**Reporting:** we ensure that reporting procedures are clear and all staff and associates know how to deal with concerns related to child safeguarding;

**Responding:** we ensure that all the necessary action to support and protect children in case of presume, proved or attempted abuse are taken.

<sup>10</sup> For further details see Keeping Children Safe coalition, <https://www.keepingchildrensafe.org.uk/>

# I. Awareness raising

Fostering dialogue and debate on children's rights and child safeguarding both inside and outside the organization is essential for establishing a child safeguarding culture.

Cesvi commits to increase awareness of its employees and collaborators – including volunteers, partners, suppliers and contractors – and communities on child protection related issues in general, and specifically on the present Policy and related procedures.

As far as the Policy dissemination is concerned, Cesvi commits to provide induction on the Policy to all new staff, according to what is described in part *Induction and training*.

Proper dissemination of the Policy shall be ensured also to communities and people served by Cesvi projects, including children. Thus, according to available human and financial resources, Cesvi shall make the Policy available by translating it into local languages. Policy contents shall be disseminated using proper communication languages, formats and media that are easily understood, respectful and culturally appropriate for different communities and members of community, especially vulnerable and marginalized groups. Children too, shall be made aware about child protection concerns and Policy provisions as well. Thus, a child-friendly version of the Policy and information material on children's rights should be made available and shared with children belonging to communities where Cesvi operates.





## II. Prevention

### 1. HUMAN RESOURCES

#### A. SAFE RECRUITING

Cesvi ensures to apply the highest standards in its recruitment across the organization. Recruiting and selection principles and procedures are detailed in Cesvi Human Resources Policy.<sup>11</sup>

As to ensure that all candidates and staff having direct or indirect contact with children are checked for their suitability for working with children, through its Child Safeguarding Policy Cesvi commits :

- to make sure that in all vacancy advertisements Cesvi commitment toward child safeguarding and a reference to the present Policy is included;
- to make sure staff, consultants and volunteers are recruited with clear job or role descriptions that include a statement on child safeguarding responsibilities assigned;
- to make sure all interviews include a discussion on child safeguarding, to guarantee the candidate's understanding of this and of the organization's commitment;
- to make sure that references taken from previous employers include questions on the candidate's conduct and behaviour;
- to make sure that the organization is not employing a convicted abuser and deter those with previous convictions from applying, protection checks, such as criminal records or check disclosure of previous convictions are performed. If criminal record checks are not possible, all new staff shall provide a self-certification of absence of penalties (Annex 2);
- to make sure that new employees sign contracts including Child Safeguarding Policy and the organization's Code of Conduct.

- To make sure that Child Safeguarding responsibilities are written into job descriptions and are included in performance management/appraisal discussions.

#### B. BEHAVIOUR PROTOCOLS

Humanitarian workers are expected to uphold the highest standards of personal and professional conduct at all times to protect beneficiaries. Violence against children directly contradicts the principles upon which humanitarian action is based, represents a protection failure on the part of the aid community and jeopardizes the credibility of all assistance agencies.

All Cesvi employees and related personnel are required to behave irreproachably with the project beneficiaries or members of the community, using particular care with children.<sup>12</sup> Guidance on ethical and proper standards of behaviour of adults towards children are specified in Appendix 1.

Cesvi Senior Management takes responsibilities for ensuring child safeguarding measures are implemented. The Senior Management:

- appoints the Child Protection Officer as Focal Point on Children Safeguarding at HQ level. The Focal Point assists HQ and Countries' teams in the Policy implementation. Duties, skills and responsibilities of the Focal Point are detailed in Appendix 2; at country level, the responsibility lies in the Head of Mission who can further appoint, after consulting with the HQ FP, the most suitable member of the staff as Focal Point;
- assigns responsibilities to all other staff, as relevant according to their role.<sup>13</sup> These are typically:

<sup>11</sup> Cesvi (2007), *Human Resources Policy and other staff policies and codes*, <https://www.cesvi.org/wp-content/uploads/2016/12/Policy-risorse-umane.pdf>

<sup>12</sup> Cesvi (2017), *Ethical Code*, [https://www.cesvi.eu/wp-content/uploads/2018/01/Cesvi\\_Ethical\\_Code\\_2017.pdf](https://www.cesvi.eu/wp-content/uploads/2018/01/Cesvi_Ethical_Code_2017.pdf)

<sup>13</sup> Built on table for PSEA responsibility in Davey D., Haven Taylor L. (2017), *PSEA implementation quick reference handbook*, CHS Alliance, GCPS Consulting UK.

ROLE	RESPONSIBILITY
All staff	<ul style="list-style-type: none"> <li>Adhere to Child Safeguarding Policy and Code of Conduct and report concerns.<sup>14</sup></li> </ul>
All Managers	<ul style="list-style-type: none"> <li>Ensure all new employees receive the CS Policy training as part of their induction;</li> <li>Ensure CS measures are implemented within their area of responsibility;</li> <li>Ensure child safeguarding measures are integrated with existing processes and systems (strategic planning, budgeting, recruitment, programme cycle management, performance management, procurement, partner agreements etc.);</li> <li>Follow up and address CS issues appropriately.</li> </ul>
HR staff	<ul style="list-style-type: none"> <li>Implement necessary measures when recruiting new staff and volunteers;</li> <li>Document who has signed the CS Policy and who has received training on child safeguarding;</li> <li>Ensure all new employees receive a copy of CSP prior to – or at the time of – issuing an employment contract. A signed copy of Declaration Form (Annex 1) must be placed in their personal file.</li> </ul>
Programme staff	<ul style="list-style-type: none"> <li>Ensure that the communities are aware of the CSP and how to report concerns.</li> </ul>

### C. INDUCTION AND TRAININGS

Induction and training are needed to ensure that Policy addressees understand and work in accordance with CS requirements.

All Policy addressees sign the CS Policy and receive induction that help them understand why it is necessary to safeguard and protect children and which are the obligations arising from the CSP – among the others, the obligation to report CS concerns<sup>15</sup> and reporting channels – and the implications of breaching Policy provisions.

According to their role, Policy addressees can be provided with different learning supports. These could be in-classroom training, webinar, e-learning, leaflets etc.

Staff with particular responsibilities relating to child safeguarding shall be provided with a more in-depth training within 6 months from their engagement – both in HQ or locally, according to the resources available. Procedures such as performance review, annual appraisal and so on, shall include a section on adherence to the Code of Conduct and the CS Policy provisions.

### D. PARTNERS, SUPPLIERS AND CONTRACTORS

Partners, suppliers and contractors are among Policy addressees.

As far as partners<sup>16</sup> are concerned, Cesvi assesses the CS measures that partner organizations have in place. For this purpose, a specific section is added to the Partner Assessment Form. When partners are involved in project directly targeting children, their suitability in working with child should be prioritized, as to guarantee the safeguarding of the beneficiaries as much as possible. Partner organizations working with Cesvi must have their own written Child Safeguarding Policy, or – in case this is not available – must abide by Cesvi's one throughout the duration of the partnership. In this case, the adoption of Cesvi CS measures is ensured by signing the MoU that makes explicit reference to Cesvi CS Policy.

Cesvi encourages all the partners having massive components of work with children to equip themselves with a Child Safeguarding Policy also by providing support and training to partners – according to resources available.

In case of Consortia, when Cesvi is the Consortium Leader, Cesvi CS Policy applies to all Consortium members, if no different agreement is reached by partners. If Cesvi is not the Leading Agency then, attempts should be made to include safeguarding provisions within the agreement, trying to reach the highest protection standards. Within its partnership Cesvi will also promote the adoption and implementation of Keeping Children Safe standards on child safeguarding.

The non-fulfilment of CS Policy provisions by the partners could lead to the end of the partnership.

As far as suppliers and contractors are concerned, the acceptance of the CS Policy by signing a declaration form (Annex 3) is a condition to undertake any contractual relation with Cesvi.

### E. VOLUNTEERS

Cesvi volunteers must be aware and adhere to the Cesvi Volunteers Guidelines and to the Cesvi Value Chart.

Volunteers providing support to Cesvi activities with children must be aware and adhere to Child Safeguarding Policy and shall receive induction to safeguarding measures. These volunteers must be always accompanied during their staying in Cesvi or partners structures or activities and in no circumstances they should be left unattended with children.

### 2. COMMUNITY ENGAGEMENT

Communities and children Cesvi works with shall be fully aware about organizational commitment to child safeguarding and how to complain if these commitments are not met.

It is particularly important to ensure children are made aware about their right to be heard (as per Article 12 UNCRC).

As previously mentioned, Cesvi shall communicate in languages, formats and media that are easily understood, respectful and culturally appropriate for different members of the community, ensuring representation of vulnerable and marginalized groups. The involvement of the community is strongly recommended throughout the process of developing key messages from CS Policy that communities need to know.

### 3. SAFE PROGRAMME DESIGN

Cesvi is committed to design and deliver programmes that are safe for children. Thus child safeguarding shall be considered at every stage of programme or project design, even in those programmes that are not child-protection targeted.

Key actions for guaranteeing child-safe programming are the following:

- Projects are assessed with relation to potential risks for children, determined by the nature of the activity (working with children) or the design of the activity (design of the activity introduces risks to children). Risk is scored as per the table on the following page.
  - In case of medium or high score a specific risk assessment is performed at design/development stage to identify risks and dangers for children, including through consultation with communities and children, to better understand protection concerns and perceived risks. Assessment focuses on relevant data on childhood conditions in the country/area, including existing community child-protection mechanisms; stakeholders involved in child protection (both as source of information and coordination/complementarity); legal, social welfare and child protection arrangements; organizational capacity etc.
- According to the results of risk assessment, risk management strategies shall be developed as to minimize the risk that the delivery of programmes or projects could harm children.
- In case at the end of the assessment too many risks are identified and in case such risks can't be reduced or mitigated, the project should not proceed.
- Specific activities needed for child protection mainstreaming to be effective, as and if these are identified in the risk assessment, are incorporated in project's Action Plan – including referral systems for unmet needs. Needed human and financial resources are also guaranteed.
  - Before activities are conducted, the written permission of parents/caregivers and, if available, children must be obtained.

<sup>14</sup> See Cesvi (2018), *Whistleblowing Policy*, [https://www.cesvi.org/wp-content/uploads/2018/04/Cesvi\\_Policy\\_Whistleblowing.pdf](https://www.cesvi.org/wp-content/uploads/2018/04/Cesvi_Policy_Whistleblowing.pdf)

<sup>15</sup> Policy recipients shall also be aware of their right to be protected from retaliation as foreseen by the Whistleblowing Policy (2018).

<sup>16</sup> Partners are commonly defined as those organizations which are contracted to deliver programmes and projects or providing funding (CHS Alliance, *PSEA Implementation quick reference handbook*, p. 21).

<sup>17</sup> See CHS Alliance, *Verification Framework*, requirements 4.2 and 4.3, [https://www.chsalliance.org/files/files/CHS\\_Verification\\_Framework.pdf](https://www.chsalliance.org/files/files/CHS_Verification_Framework.pdf)

<b>LOW 1</b>	<b>No contact with children</b>	
<b>MEDIUM 2</b>	<b>Contact with children</b>	Contact with children means being engaged in an activity or in a position that involves or may involve contact with children, either under the position description or due to the nature of the work environment. This means physical contact, face-to-face contact, oral communication, written communication or electronic communication.
	<b>Examples</b>	<ul style="list-style-type: none"> <li>▪ Oral and written communication (including electronic communication) relating to a child</li> <li>▪ Visiting premises e.g. schools, health or residential facilities, that provide services to children</li> <li>▪ Any community consultation (data collection, surveying, training) involving children</li> <li>▪ Health Sector Programs</li> </ul>
<b>HIGH 3</b>	<b>Working with children</b>	Working with children means being engaged in an activity with a child where the contact would reasonably be expected as a normal part of the activity and the contact is not incidental to the activity. The risks of child exploitation and abuse generally increase with the frequency of contact, meaning that working with children is a higher risk than the simple contact with children.
	<b>Examples</b>	<p>Activities or services for children:</p> <ul style="list-style-type: none"> <li>▪ Residential care - Child accommodation services</li> <li>▪ Child protection services</li> <li>▪ Disability service</li> <li>▪ Justice facilities for children</li> <li>▪ Childcare services</li> <li>▪ Child education services, children in sports</li> <li>▪ Health services, access to Sexual &amp; Reproductive Health</li> <li>▪ Counselling and support services for children</li> <li>▪ Emergency response, humanitarian assistance to children and families</li> </ul>

- A reporting and responding process for incidents and concerns which is locally appropriate – feedback and complaint handling mechanism - is developed.
- Relevant technical standards and good practices employed across child-protection sector are adopted by the project.
- Staff with particular responsibilities relating to child safeguarding is supervised on a regular basis, and given the opportunity to participate in discussions about safeguarding issues – for example in meetings, informal discussions and/or through considering case studies.
- Periodic review of programmes and projects is conducted to identify new or potential risk and child protection concerns.

#### 4. COMMUNICATION AND MEDIA

The use/abuse of images of children has become overwhelming both on traditional and social media. It powerfully invades our everyday life and our individual and private imagination. Children are objects of interest for the mass media at many different levels. Children are often presented in a stereotyped form, as impotent victims of abuse, conflicts, and poverty. Particularly vulnerable children, like street children, child workers, poor and malnourished children, refugees etc. are frequently represented through news reporting that does not give due consideration to their dignity as individuals.

Cesvi’s communication strategies, including those used for fundraising, abide to the principles of the ethical and respectful communication, according to which children and young people belonging to socially vulnerable groups and their problems are given space in the communications media and are presented as dignified human beings.

#### Cesvi commits to:

- 1. GET PERMISSION:**  
communication materials shall always be collected in respect of the culture, community or environment. Permission shall always be sought before taking photos or video footage of children, and in general of individuals, as well as before requesting them personal information. No pictures or video shall be taken if people do not allow us to do that. Guidelines on Consent are detailed in Annex 4.
- 2. SUPERVISE MEDIA VISITORS AND CHILDREN’S INTERVIEW:**  
international and local staff commit to adopt adequate conduct while interviewing children. Specific guidelines are detailed in Appendix 3. The same indications apply to third parties, such as journalists, film crews, celebrity supporters etc. who may visit the field projects under Cesvi responsibility.
- 3. DEPICT CHILDREN RESPECTFULLY:**  
portray children always as valuable individuals and not as objects. Pay special attention to the most vulnerable categories: disable children, sick children, refugees, children belonging to minorities etc.
- 4. PRIVACY:**  
any information that could be used to identify a child or put them at risk will not be used.
- 5. SHOW CHILDREN IN A DIGNIFIED MANNER:**  
avoid taking pictures/making videos of children who are completely naked or in poses that might be seen as sexually suggestive. Refuse all pornographic, erotic and obscene images.
- 6. USE THE IMAGES IN A TRUSTFUL AND CONTEXTUALIZED WAY:**  
when documenting a situation, provide the public with elements of the wider context in order to make people understand the complexity behind the image. Never distort or manipulate the reality, for example through misleading postproduction or misleading cropping, or asking people to do things that are unusual to them, or representing exceptional situations as if they were common.
- 7. REPRESENT DIVERSITY:**  
try to show the diversity of people by including in the photos/videos not only children, but also men, women, elder people, people from different ethnic groups etc. Take into consideration the advice of local staff and local partners when concerns arise.
- 8. USE A “BALANCED” APPROACH:**  
when possible, make any effort to find a “balance” between positive and negative images in order to portray the different sides of a situation. Do not forget to show how much local people work to help themselves also in tough situations.
- 9. CREATE A PROPER PHOTO/VIDEO ARCHIVE:**  
all images/videos will be digitally stored at HQs level in a proper archive. Information about a child/ children’s life and photographs of children (including information stored on the computer) will be kept in secure files. Access to these files should be limited to those that need to use them for their work.



# III. Reporting and responding

Cesvi CS Policy sets minimum standards for guaranteeing child safeguarding. Country specific procedures – approved by the HQ and periodically updated by Country offices according to the evolution of Cesvi operations in the country and applicable child protection national legislation – shall define the specific flowcharts for the reporting, investigation and response process.

## 1. REPORTING

In accordance to its Whistleblowing policy - establishing the right and duty of every Cesvi staff member to report any known or suspected violation of Cesvi Code of Conduct, key values and policies - Cesvi CS Policy regulates the reporting process of child protection concerns.

Policy addressees have the duty to report any violation of Cesvi CS Policy or any situation in which children may be or are at risk of abuse and actions that they become aware of work during their job activities and/or during the execution of their duties and/or during their relationships with Cesvi.

It is also responsibility of Cesvi to set up and duly communicate, in all Countries where it operates, proper feedback and complaint handling mechanisms to allow communities involved in Cesvi's activities/projects and programmes to report child safeguarding concerns.

Country procedures shall set the following::

- define reporters: staff, beneficiaries and other specified stakeholders having the duty/right to file a complaint and their right to confidentiality and non-retaliation;
- specify purpose, parameters and limitation of the procedure (see *Terms and Definitions* section for guidance on what constitutes abuse);

- define reporting timeframe, to guarantee the rapid activation of responsible persons and the prompt start of investigation aimed at securing the child. Reporting shall be done within 24 hours from the moment the incidents happens or the concern arises, or from when the reporter becomes aware of it;
- define reporting mechanisms, including formats and entry points accessible both by external and internal reports. For external reporters, multiple entry points (free-toll phone, complaints boxes, info points, mail etc.) shall be planned to ensure complaining is appropriate for, accessible to and understood by all relevant groups of adults and children;
- define reporting flowchart: child safeguarding roles and responsibilities are assigned to all staff according to HQ/Country office/projects organizational charts (see *Behaviour protocols* section). As general rule, the first line reporting is the person in charge of the local Child Safeguarding Focal Point (CSFP). If the CSFP is out of office, the line manager is the first reporting line, unless he/she is the alleged perpetrator. Any local CSFP who receives a report of any allegation of a violation of the Policy or child abuse must immediately forward the Incident Report (Annex 5) to the HQ CSFP;
- define procedures to properly store all documentation to ensure protection of data. Exact copy of the whole documentation shall be sent to HQ.

HQ CSFP shall inform Cesvi Supervisory Body and the Foundation's Internal Audit as per Cesvi's Whistleblowing Policy.

## HOW TO DEAL WITH DISCLOSURE FROM CHILDREN

Children can directly report concerns, abusive behaviour or threatening situations they found themselves involved into. Any person getting in contact with a child disclosing such feelings and information shall take such disclosure seriously and behave to avoid further stress on the child. He/she shall:

- listen to the child without pushing him/her during his/her report with the aim of obtaining information. It is important to let the child take his/her time;
- as soon as possible, seek the support of internal/external experts specialized in providing psychological or psychosocial support to children, with particular attention to gender;
- inform the child about the procedure that will be followed – including who is the people the information will be shared with - in a simple and transparent way. Tell the child when he/she is expected to receive a feedback and how;
- report carefully in the Incident Report form what reported by the child, carefully avoiding bias;
- take immediate action if a reasonable doubt raises that the situation poses a threat to children security and safety, also involving other services to whom refer the case.

In case further investigation is needed, avoid asking the child to tell about the incident again and again. The best thing is to identify a person who has the right tools to collect the complete information from the child at once. This person will then report to the others involved in the case management.

## 2. RESPONDING

Cesvi shall ensure that each child protection concern or allegation of abuse is taken in due consideration without delays and is appropriately investigated until the case is closed. Complainants and survivors have the right to receive feedback on the development and outcome of their case.

Cesvi guarantees that a multi-disciplinary team (Case Management Team) - duly trained and mandated - manages child protection concerns and that investigation and decisions responsibilities are shared by more than one person. Whenever necessary in order to guarantee proper case management, assistance is sought from externals. In case of suspicion of a criminal offence the team will activate the Crisis Management Unit (see box on page 24).

Cesvi guarantees that confidentiality is maintained at all stages of the investigation and that information is shared on a need-to-know basis only.

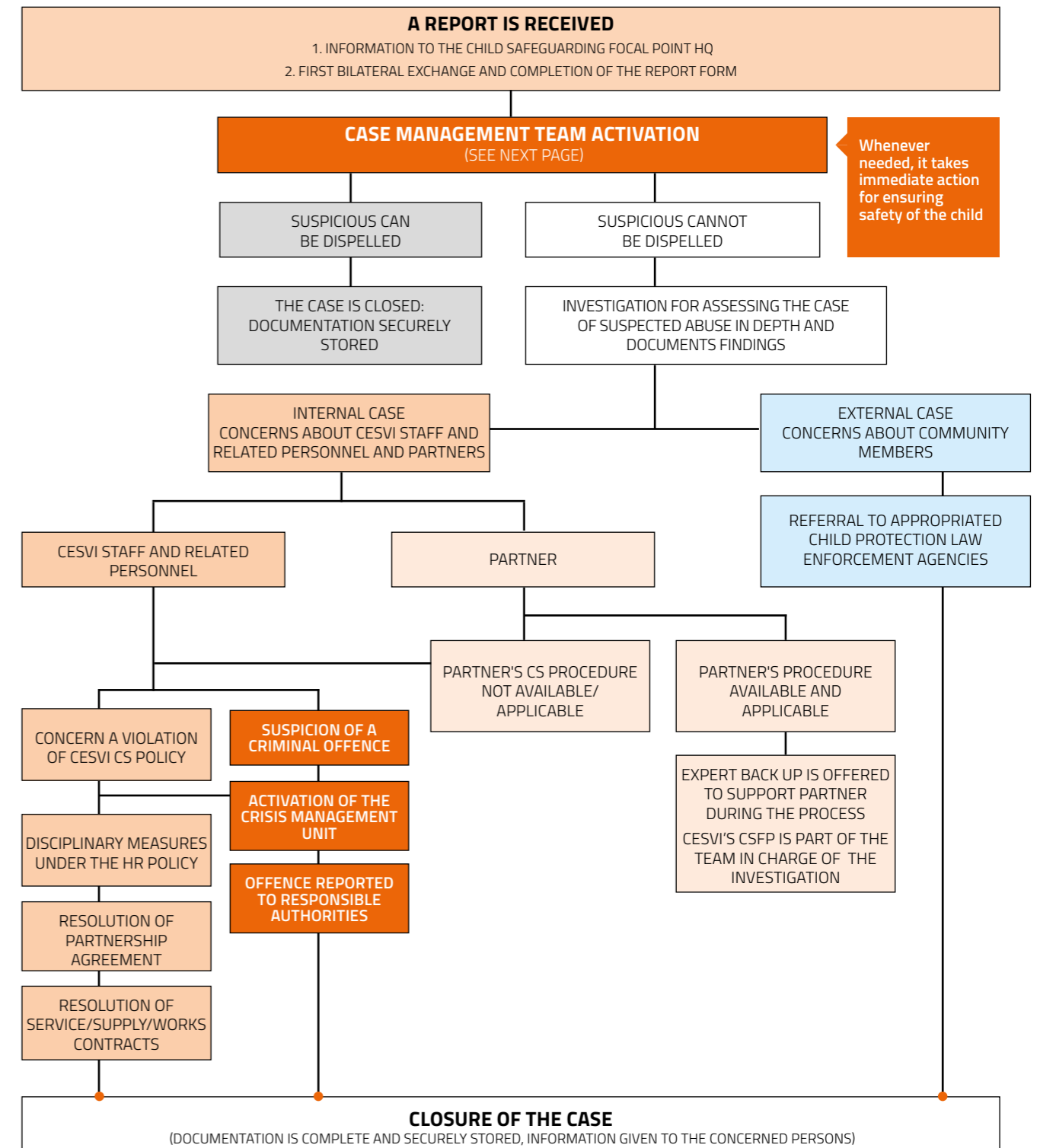
Children protection and security shall be ensured during the entire case management process and the best interest of the child has to be of paramount consideration in deciding about a suspected, alleged or proven case. Cesvi shall ensure that risks incurred by children are assessed in a timely manner, and decisions and acting are undertaken without unnecessary delay. To the most possible extent, investigation shall be closed in the shortest time

possible after the concern has been arisen. The individual alleged to have violated this Policy should have the opportunity to present his or her view of the events in question. Should allegation be confirmed, Cesvi ensures to take appropriate disciplinary actions including immediate termination of employment and referral for criminal prosecution and legal action, where appropriate, against the person who abused, in accordance with the applicable law.

Should, at the end of the preliminary inquiry, the report be shown to have been self-serving or intentionally false, the disciplinary steps indicated in the Human Resources Policy will be taken against the person who presented the report, and a crime complaint will be made to appropriate authorities, in case of crime. Cesvi commits to ensure that psychosocial counselling, medical treatment and legal assistance are provided to any child victim of violence - if identified as not specious, unfounded or false – if perpetrated by one of its staff members or associated personnel. Such assistance will be determined on a case by case basis and considering the extent of the violation.

Complete documentation about cases shall be stored in safe and protected archives, both in Country offices and HQ. The HQ CSFP maintains a database with all cases and prepares a report on child safeguarding violations to be shared with the General Manager on a yearly basis.

## 3. PROCEDURE FOR MANAGING CASES OF CHILD SAFEGUARDING VIOLATION



**CASE MANAGEMENT TEAM CONSISTS OF:**

- Child Safeguarding Focal Point HQ
- Desk Officer
- Head of Mission/Child Safeguarding Focal Point
- Head of Human Resources
- Head of Legal
- Security Advisor
- Internal Auditor

When necessary, other external professionals relevant to the case are involved. In case a suspected abuse involves a partner organization, also the member of the partner could be contacted to participate in the investigation.

Within the framework of the procedure the team consults internally:

- to evaluate the reasons for suspicion;
- to evaluate the severity of the incident;
- to confirm the degree of urgency;
- to reach decision on whether an investigation should be undertaken or not;
- to elaborate an action plan with timing, role and responsibilities to deal with the case.

The team is also in charge of leading the investigation on suspected cases of abuse. Based on this investigation it will decide whether the suspicion is dispelled, whether a violation of the Policy has been found or whether the suspicion of a criminal offence is founded or not. Further measures are taken according to these steps.

If the allegation are made overseas the CM Team will conduct the investigation in direct collaboration with Cesvi local staff and according the national legislation and procedures. In any case the Team will maintain the leadership of the investigation.

Shall the Case Management Team's investigation confirm the responsibilities of the alleged person, disciplinary measures can be resorted to solely when the CEO authorizes.

In case of suspicion of a criminal offence the team will activate the Crisis Management Unit.

**CRISIS MANAGEMENT UNIT CONSISTS OF:**

- CEO
- Chief Operation Officer
- Head of Programme
- Head of Communication
- Head of Human Resources
- Head of Legal
- Security Advisor
- Child Safeguarding Focal Point

The Unit is activated by the Case Management Team when in-depth investigation of a suspicion of criminal offence goes into substance.

The Unit has four principal tasks:

- it will be responsible to contact, according with the Board of Directors, the police and/or other authorities in order to report the incident;
- check the obligations on informing relevant bodies on the incident. For example donors, networks, Statutory bodies;
- activate the Crisis Communication Strategy of the organization;
- report to the Board of Directors.

The CEO, if no objection is raised by the Board of Directors, shall take all relevant decisions and measures.

## IV. Monitoring and review

The Policy is updated at least once every three years by the Child Protection Officer and the Compliance Officer.

On an annual basis, Cesvi shall perform a self-assessment on the implementation of the Policy to track the process about ensuring safeguarding and identifying areas for improvement. Specific improvement plan is therefore prepared on the basis of the self-assessment.

By the 31st March every year, the CP Officer or the person in charge drafts an annual CS Report for the General Manager. General contents of the Annual CS Report include:

- report on child safeguarding cases of concern managed during the last year;
- report on effected and planned training activities updates on checks and assessments performed, also together with external bodies (e.g. Keeping Children Safe);
- results of self-assessment and improvement plan;
- forecast and analysis of resources available to implement the improvement plan.



# Appendices and annexures



## Guidance on ethical and proper standards of behaviour of adults towards children

This guidance is for all Policy recipients as meant in this document. In general for those activities where children are involved a regular rule should be followed, that is to say the co-presence of two or more adults (the so called 'two-adults rule').

### IT'S IMPORTANT FOR ALL STAFF AND OTHER IN CONTACT WITH CHILDREN TO:

- be aware of situations which may present risks and constitute child abuse or exploitation;
- be sure to know who is the Child Safeguarding Focal Point or the person to refer to, in case of need;
- treat all children equally: be inclusive and involve all children without discrimination;
- be visible to others when working with children whenever possible;
- be aware of the use of language, action or how relation with children could be perceived;
- use non-violent and positive behaviour with children;
- encourage children's voice and views;
- inform children and communities about their rights to report concerns;
- obtain children and parents permission before taking photos, making videos or record any part of their stories;
- be aware of possible risk in peer relations (including bullying or peer abuse).

### DON'T:

- spend excessive time alone with children away from others;
- promote any action or behaviour that could be construed as poor practice or potentially abusive;
- perform activities for children that they can do themselves;
- act in any way that may be abusive or place others at risk of abuse;
- discriminate, shame, humiliate, belittle, or degrade children;
- hit or otherwise physically assault children;
- have a child with whom you are working to stay overnight at your home unsupervised;
- publish any stories that can put children in danger;
- engage in any type of sexual activities with person under the age of 18;
- condone or un-report any concern or suspected violation.

Adapted from Eurochild Child protection Policy

## Role and responsibilities of Child Safeguarding Focal Point

A Child Safeguarding Focal Point is a designated person who is responsible of making sure that the Child Safeguarding Policy is implemented and followed. This role should reflect the nature and structure of the organisation and the person should have enough support to carry out the role.

At each appropriate level or setting there should be an appointed person/s who everybody can talk to about child safeguarding matters. Everyone should know how to contact this person(s). Other people in the organisation can then go to them if they have concerns about child safeguarding or abuse.

The designated Child Safeguarding Focal Point is responsible of hearing any child-abuse concerns in an organisation, and then dealing with those concerns.

Focal Points should be appointed so that children can have access to a trusted adult, so they can have the opportunity to be listened to if they want to make a complaint.

### THE ROLE OF THE DESIGNATED CHILD SAFEGUARDING FOCAL POINT IS TO:

- take a lead role in raising awareness about the organization's child safeguarding measures including the Code of Conduct and if necessary provide training and advice to staff and volunteers on these measures;
- work with managers/staff to ensure that programmes and operations are integrating CS measures in all activities;
- promote the participation of the beneficiaries of the project so they are aware of the organisation's CS measures and Code of Conduct and of their right to protection. They also have to be aware of how they would raise a concern about child safeguarding;
- act as a focal point to receive information about the child safeguarding concerns;
- work with programme managers to establish community-level complaints mechanisms that facilitate reporting of concerns made by beneficiaries;
- ensure that all information is recorded on the child safeguarding incident form and referred to the Case Management Team (HQ);
- plan and participate in any investigation regarding an incident;
- maintain the child safeguarding incident tracker;
- provide overall support to a wider implementation of policies and procedures in order to safeguard children;
- assess child safeguarding risks within the organisation, including in its programs and projects;

- consult with local agencies whenever necessary and gather up-to-date information about service provision;
- ensure that referral pathways for child safeguarding responses are updated;
- in consultation with the Crisis Management Unit, make a formal referral to a statutory agency (e.g. police) or other organisation, if appropriate.

### SKILLS

- Have knowledge and experience about child protection;
- Capacity to maintain confidentiality in information management and communication, as appropriate;
- Good communication and relationship skills;
- Skilled in analysing capacity building needs and designing and delivering a range of capacity building interventions;
- Oral and written communication ability to suit target audience and deliver messages effectively.

## Interviews to children and photojournalistic visits

Our international and local staff commits to respect Cesvi's communication guidelines and Child Safeguarding Policy when interviewing children. The same indications listed below apply to third parties, such as journalists, film crews, celebrity supporters etc. who may visit the on-field projects under Cesvi responsibility.

- Prior to the beginning of the interview, explain the child the topics you want to "cover" and discuss with him/her if necessary.
- Take into account the peculiarity of male/female sensitivity: for example, in some contexts it may be appropriate that girls are interviewed by women, and not by men. Try to avoid questions that can make boys/girls feel uncomfortable.
- Be sure that during the interview the child is supported by an adult that he/she trusts. Ask the child to indicate the person(s) he/she wants to be present.
- Remember that the child can stop the interview and deny his/her consent at any point.
- Check if you can reveal the first name of the child in the captions/texts, as well as the name of the place where he/she lives and other personal details. If necessary, replace the real name with an alias name. We recommend you not to publish in any case those details that could make the audience identify the child (e.g. family name, address, name of the school he/she attends, etc.)

When working with photographers, video makers, journalists and/or celebrities on the field, please make sure that:

- they are briefed on Cesvi Child Safeguarding Policy and commit to respecting all principles expressed in the related communications policy and guidelines;
- they do not spend time alone with children and/or have access to children without supervision;
- they spread the images/footage/information of children only in accordance with the Communications Department of Cesvi, respecting the following principles: protection and best interest of the child, respect, participation, non-discrimination and justice.

# Annex 1

## DECLARATION FORM (Staff)

The undersigned

*[please identify your full name and position at Cesvi]*

born in \_\_\_\_\_ on \_\_\_\_\_

### DECLARES TO HAVE READ:

1. Cesvi Ethical Code;
2. Cesvi Staff Code of Conduct;
3. Cesvi Protection from sexual exploitation and abuse (PSEA) Policy;
4. Cesvi Policy to prevent corruption and fraud;
5. Child Safeguarding Policy.

The undersigned also declares to have fully understood and to agree with the documents mentioned above.

Hereby the undersigned declares and guarantees to be aware of the obligation to act in a manner which promotes the best interests of Cesvi and to commit to avoid any violations when taking decisions and acting on behalf of Cesvi.

Should a violation occur, the undersigned recognizes his/her obligation to inform, according to his/her position, the reference person in accordance with the policies and procedures in place or to report in other relevant manner as described in the above listed documents and related policies.

Any variation to the information and declarations provided in this form must be communicated by the undersigned in written form to the line manager or other authorized person in Cesvi.

Signature \_\_\_\_\_ Date \_\_\_\_\_

# Annex 2

## SELF-CERTIFICATION OF ABSENCE OF PENALTIES

I undersigned

born in \_\_\_\_\_ on \_\_\_\_\_

with ID/PASSPORT N. \_\_\_\_\_

### HEREBY DECLARE THAT:

- I have never been charged with any crime, including, but not limited to the child related offenses.
- I will undertake to provide Cesvi Fondazione Onlus (hereinafter "Cesvi") with the maximum relevant information regarding my criminal history.
- I have read Cesvi's Child Safeguarding Policy, Cesvi's Ethical Code and Cesvi's Code of Conduct, I understand them in full and I commit to adhere to them unconditionally.
- I understand that if any of my background checks disclose a record of criminal activity or abuse that would violate the standards set forth in Cesvi's Child Safeguarding Policy and Cesvi's Ethical Code, then I will be immediately disqualified from employment/engagement with Cesvi as indicated in the abovementioned documents.
- If in future, I am charged with any child related offence, I will immediately inform Cesvi. I am fully aware of the fact that such occurrence is a reason for immediate termination of my contract/engagement with Cesvi. Cesvi could ask to provide the original or certified copy of official documents - Extract from the Criminal Record (Criminal History Record) - of my home country or any other country with the closest connection in order to reflect my true criminal history and I will send it within 30 (thirty) days from the date of the possible request\*.
- I am aware that if any information in self-certification would otherwise be false, it will be cause to an immediate termination of my contract with Cesvi and Cesvi will be entitled to pursue further legal actions and claim the damages.

I, signed below, hereby confirm that all the above-mentioned information is correct and exhaustive.

Signature \_\_\_\_\_ Date \_\_\_\_\_

*\*All data will be treated by Cesvi following the rules as indicated by Data Protection EU Regulation 679/2016 (GDPR).*



# Annex 3

## DECLARATION FORM FOR PARTNERS AND SUPPLIERS

The undersigned \_\_\_\_\_  
*[please identify your full name and position]*

born in \_\_\_\_\_ on \_\_\_\_\_

on behalf of \_\_\_\_\_ with registered office in \_\_\_\_\_  
*[please identify your Organization/Entity full name]*

### DECLARES TO HAVE READ:

1. Cesvi Ethical Code;
2. Cesvi Protection from sexual exploitation and abuse (PSEA) Policy;
3. Cesvi Policy to prevent corruption and fraud;
4. Cesvi Child Safeguarding Policy.

The undersigned also declares to have fully understood and to agree with the documents mentioned above.

Hereby the undersigned declares and guarantees to be aware of the obligation to act in a manner which promotes the best interests of Cesvi and to commit to avoid any violations when making decisions and on behalf of Cesvi.

Should a violation occur, the undersigned recognizes his/her obligation to inform, according to his/her position, the reference person in accordance with the policies and procedures in place or to report in other relevant manner as described in the above listed documents and related policies.

Any variation to the information and declarations provided in this form must be communicated by the undersigned in written form to the line manager or other authorized person in Cesvi.

Signature \_\_\_\_\_ Date \_\_\_\_\_

# Annex 4

## CONSENT FORMS

We will always seek the permission before taking photos or video footage of children, and in general of individuals, as well as before requesting their personal information.

The first step is explaining to the local community, with the help of the local staff, the objective of our communication work, and inform them about where and how their images/data will be used. The local staff will act as facilitator and/or interpreter to ensure that children and communities are fully aware of the scope of our work, and give us their (written or verbal) consent to proceed.

We will never take pictures/make videos of people who do not allow us to do that.

### REGARDING CONSENT FORMS, WE WILL ACT AS FOLLOWS:

- Whenever possible, we will seek written permission: as for minors, we will ask their parents or those who have parental responsibility, or legal guardians, to sign.
- If it is not possible to identify an adult who legally represents the child, and the child attends or live in a structure managed by Cesvi, such as the Houses of Smiles, on a regular basis, the international or local representative of Cesvi may sign the consent form.
- If it is not possible to obtain a written consent because such document may have little or no meaning to people of low literacy, or who live in cultu-

res where photographs and publications are not common, we will seek their verbal consent. In this case, a local representative of Cesvi will sign a declaration where he/she states that he/she has properly informed the community about the scope of collecting images and information and about their circulation, and that he/she has obtained a verbal expression of consent.

- In situations of public interest or of large groups or crowds, where individuals cannot be recognized (e.g. concerts, demonstrations, distributions of items, etc.), consent is not needed.
- In war/conflict situations, where it could be dangerous to seek permission, consent is not needed.

## INFORMATION TO DATA SUBJECT FOR THE COLLECTION OF CONSENT FOR USING PHOTO AND VIDEOS

Surname \_\_\_\_\_ Name \_\_\_\_\_ Born/in \_\_\_\_\_  
 Prov. \_\_\_\_\_ on \_\_\_\_\_ at \_\_\_\_\_  
 Prov. \_\_\_\_\_ Street \_\_\_\_\_ n. \_\_\_\_\_

Surname \_\_\_\_\_ Name \_\_\_\_\_ Born/in \_\_\_\_\_  
 Prov. \_\_\_\_\_ on \_\_\_\_\_ at \_\_\_\_\_  
 Prov. \_\_\_\_\_ Street \_\_\_\_\_ n. \_\_\_\_\_

### EXERCISING HIS/HER PARENTAL RESPONSIBILITY / LEGAL GUARDIANSHIP TOWARD THE MINOR

Surname \_\_\_\_\_ Name \_\_\_\_\_ Born/in \_\_\_\_\_  
 Prov. \_\_\_\_\_ on \_\_\_\_\_ at \_\_\_\_\_  
 Prov. \_\_\_\_\_ Street \_\_\_\_\_ n. \_\_\_\_\_

### HEREBY AUTHORIZES

the Italian NGO Cesvi to publish and/or disseminate in any form the images of the above-mentioned minor on the websites, on social media, in print and/or on any other means of dissemination of Cesvi and of other subjects, such as newspapers, with whom the NGO works, as indicated in the EU Regulation 679/16 and to art. 96 and 97 of the Law 22.4.1941, n. 633 (Law on the Protection of Copyright and Neighbouring Rights). Furthermore, the undersigned allows Cesvi to keep the same photographs in its archives and declares that he/she knows that the purpose of these publications is solely linked to the communication of Cesvi's humanitarian activity. Pursuant to art. 32 of EU Regulation 679/16, data processing will take place through the adoption of appropriate technical and organizational measures to ensure a level of security appropriate to the risk. This authorization may be revoked at any time by writing to Cesvi's staff.

### INFORMATION TO DATA SUBJECT FOR THE PUBLICATIONS OF DATA (ART.13 OF THE GDPR 679/16)

With this authorization, the personal data will be processed using paper and electronic methods in compliance with current legislation and the principles of correctness, lawfulness, transparency and confidentiality; for this purpose, the data provided, including the portrait contained in the above photographs, will be used exclusively for purposes strictly connected and instrumental to Cesvi's humanitarian activities as indicated in the extended authorization. The provision of consent to the processing of personal data for the aforementioned purpose is optional. Under the EU Regulation 679/16, from article 15 to 21, the owner of the data shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay, in particular the request to delete the photographic image. This right can be exercised by sending a written communication to Cesvi. The Data Controller is Cesvi NGO, based in Bergamo, Via Broseta 68/a, 24128 - Italy. The Data Processor is (Head of Mission of the Cesvi Country). The Person in charge of the processing is (indicate Cesvi's staff member who is in charge of this activity; it may be a local PM or an employee of Cesvi HQ, such as a Communications Officer visiting the projects). Pursuant to art. 37 of the EU Regulation 679/16, the Data Protection Officer is the lawyer Claudia Testa.

### INFORMED CONSENT TO THE PROCESSING OF DATA (EU Regulation 679/16)

The undersigned Mrs/Mr \_\_\_\_\_

after having read this document and understood its content, CONSENTS to the processing of the personal data of the minor in accordance with EU Regulation 679/16.

City, (date) \_\_\_\_\_ Signature \_\_\_\_\_

## Annex 5

### INCIDENT REPORT FORM

All Incident Reports must be stored securely

INCIDENT REPORT					
<b>Name and position of the person making the report</b>					
<b>Report Date</b>					
<b>Country</b>					
Please categorize the incident					
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Physical injure	Physical violence	Sexual offence	Emotional or psychological abuse	Serious neglect	Other (please specify) _____ _____ _____
Incident details					
Date of incident					
Time of incident					
Location of incident					
Name(s) of child/children involved					
Name(s) of staff/volunteer involved (please specify if belonging to a partner organization)					
Referral details					
Date of referral					
Time of referral					
Location					
Name(s) of the referrer					
Address of the referrer					
Contact of the referrer					
Relationship with child					
Child details (if available)					
Name					
Date of birth/age					
Gender					
Address					
Language spoken					
Any disability					
Status/whose legal responsibility					
Please describe the incident (including child's words if possible)					
When did it take place?					
Who was involved?					
Who was there?					

# Annex 6

## MAPPING LOCAL RESOURCES AND SUPPORT TEMPLATE

### DETAILS TO BE RECORDED SHALL INCLUDE:

#### 1. SUMMARY

Summary of main protection risks and issues children face locally, including details of commonplace/culturally accepted practices that may be harmful.

#### 2. STATUTORY CHILD PROTECTION - GOVERNMENT MINISTRIES ETC.

- Details of any government bodies or agencies with statutory authority for the protection of children – include names and contact details of Senior Officers at national and local level.
- Summary of key points of legislation governing welfare/protection of children and/or national frameworks that describe policy/practice on child protection.
- Brief analysis of implementation/enforcement of legislation as far as this is known.

#### 3. CRIMINAL INVESTIGATION/PROSECUTION – POLICE AND JUDICIARY

- Local police position on investigation of criminal assault against children and likelihood of prosecution of such offences.
- Legal age of consent in the country.
- Name and contact details of Senior Police Officer/s to whom referrals may be made.

#### 4. OTHER AGENCIES – HEALTH SERVICES, NGOS, INTERAGENCY FORUMS

- Details of health and other services that may be accessed as part of victim response at local level.
- Names and contact details of NGOs, other agencies (e.g. UNICEF, Save the Children), other relevant bodies and professional networks (e.g. paediatric or child psychology services, child care centres and any other agencies that might offer expert advice and assistance), including any local joint arrangements for dealing with child protection issues.

#### 5. COMMUNITY

Details of informal/community based justice and protection mechanisms and how these function.

What did you see?	
Why did it take place?	
Other information	
External reaction (local community, authorities, religious leaders, press...)	
Are you reporting your own concerns or responding to concerns raised by someone else? <input type="checkbox"/> Responding to my own concerns <input type="checkbox"/> Responding to concerns raised by someone else	
If responding to concerns raised by someone else, please provide further information below:	
Child quotes if available:	
<b>Alleged Perpetrator's details (if known)</b>	
Name	
Address	
Age	
Is he/she a Cesvi employee?	
Relationship, if any, with the child	
Current location of alleged perpetrator	
Other information	
<b>Office use</b>	
Date Incident Report received	
Staff member managing incident	
Measures adopted	
Follow-up date	
Current safety of child including location	
Has emergency medical attention been required? Provided by?	
Incident ref. number	
<b>Has the incident been reported, to whom and how?</b>	
Child Safeguarding Focal Point	
To Police. If not, why?	
Referral to local authority for child protection/welfare	
Referral for medical treatment/to meet health needs	
Another third party (please specify)	
<b>Notes and comments</b>	
<b>Attachments</b>	

Name and Signature

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## CHECKLIST FOR SAFE RECRUITMENT AND SELECTION

1. When you are designing the job description, analyse the role and think about the issues of child safeguarding and risk in that job:
  - a. What contact with children will the job involve?
  - b. Will the employee have unsupervised access to children, or hold a position of trust?
  - c. What other sort of contact may the person have with children (e.g. via email, telephone, letter, internet)?
2. Develop clear job descriptions, terms of reference/role briefs for all posts including where short-term contracts consultants are being recruited.
3. Make sure that the selection-criteria outline the relevant experience needed if the post involves direct work with children.
4. Make sure that the commitment to keeping children safe is included in details of any post sent to prospective job candidates.
5. Develop application forms that ask for consent to gain information on a person's past convictions/pending disciplinary proceedings.
6. Make sure you have a well-planned interview process and ensure the interviewers have the relevant experience of and knowledge about child safeguarding and best practice.
7. Include some specific questions in the interview that draw out people's attitudes and values in relation to the protection of children. Can they give examples of where they have acted to protect a child, what they learnt from this, what impact their current practice has had?
8. Take up to two references including some from previous employees or others who have knowledge of the candidate's experience and suitability to work with children.
 

*Adapted from Nolan P. (2004), The role of HR in Child Protection, People in Aid.*
9. Verify the referees.
10. Conduct as many background checks as possible.
11. Consider the use of probationary periods of employment to ensure suitability once in post.

Adapted by Keeping Children Safe

## EXAMPLE INVESTIGATION PLAN FORM CHS INVESTIGATION GUIDELINES

### What is/are the allegation/s? Is/are investigation/s needed?

ALLEGATION	IS AN INVESTIGATION NEEDED?	PRIORITY
1. e.g. sex with a child	Yes	1
2. e.g. marital infidelity	No	
3. e.g. sexual harassment of other staff member	Yes but not using SEA complaints mechanisms	2
4. ....	.....	.....

### What are the elements of the alleged breach?

ALLEGED VIOLATION	LAW	SPECIFIC ELEMENTS TO BE PROVEN
1. e.g. sex with a child	<ul style="list-style-type: none"> <li>▪ SG Bulletin</li> <li>▪ Staff Code of Conduct</li> </ul>	<ul style="list-style-type: none"> <li>▪ actual or threatened physical intrusion</li> <li>▪ sexual nature</li> <li>▪ by force or under unequal or coercive conditions</li> <li>▪ victim under 18 years of age</li> </ul>
.....	.....	.....

### Who will have to be interviewed?

NAME	ROLE IN COMPLAINT	AGE	LANGUAGE	INTERPRETER NEEDED?	HEALTH NEEDS	PROTECTION NEEDS	LOCATION	PRIORITY ORDER
John Smith	Victim	12 years	English	No	√	√	School Nairobi	2
.....	.....	.....	.....	.....	.....	.....	.....	.....



**What information do you have? What information do you need?**

INFORMATION ABOUT WITNESS	INFORMATION KNOWN:	
	Yes	No
1. Age		
2. Preferred name		
3. Race, culture, ethnicity, religion, and first language		
4. Gender and sexuality		
5. Disability and impairment, cognitive ability, linguistic ability		
6. Health needs		
7. Current emotional needs		

**Circumstances**

ADDITIONAL INFORMATION ON THE VICTIM	INFORMATION KNOWN:	
	Yes	No
1. Family members, care-takers and nature of relationships		
2. Routines (attendance at school, work, care for children)		
3. Aid provision (what they are receiving, who provides it, is it still accessible)		
4. Recent changes in circumstances contributing to vulnerability and/or reliance on others		
5. Previous allegations of abuse		
6. Whether witness is currently safe		

**Alleged incident**

	INFORMATION KNOWN:	
	Yes	No
1. What type of and how many alleged incident(s)?		
2. What happened immediately before incident?		
3. What happened during the incident?		
4. What happened immediately after incident?		
5. How did the Subject of complaint come into contact with the victim?		
6. How did the complaint come to the attention of investigators?		

**Details of exploitation/abuse**

	INFORMATION KNOWN:	
	Yes	No
1. Survivor's relationship with any protective adult (i.e. spouse, parent) and their reaction to complaint		
2. Frequency and duration of abuse		
3. Co-existence of different forms of abuse		
4. Single or multiple subjects of complaint		
5. Degree of violence and aggression used		
6. Level of threat to life (e.g. withholding of food, water or essential items from victim or others on behalf of victim)		
7. Form of coercion		
8. Whom the victim has told		

**Considerations**

	QUESTIONS ASKED:	
	Yes	No
1. Initial investigative findings (full record to be kept)		
2. Need for support and/or intermediary/interpreter		
3. Potential blocks to communication and methods for dealing with them		
4. Willingness to talk to investigators		
5. The witness is currently in a safe environment		

**Planning the interview**

SET OBJECTIVES FOR INTERVIEW AND DECIDE	DECISION MADE:	
	Yes	No
1. Has the objective of the interview been set?		
2. Who will participate in and who will lead the interview?		
3. Where the interview will take place		
4. When the interview will take place		
5. How long the interview will last and the need for breaks		

	QUESTIONS TO ASK BEFORE:	
	Yes	No
1. Does the witness have a physical/learning impairment?		
2. Does the witness have an identified mental health difficulty?		
3. What is the witness's current emotional state?		
4. What is the relationship between the witness and the Subject of complaint?		
5. How the nature of the offence (i.e. levels of violence and aggression) may impact on witness accounts		
6. Does the Subject of complaint have access to the witness?		
7. Is there evidence of previous intimidation by the Subject of complaint or any other party towards the witness?		
8. Is the witness also a victim?		



PH: ROGER LO GUARRO

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**CHS Alliance (2016), *Verification Framework***  
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**UN Committee on the Elimination of Discrimination against Women and Committee on the Rights of the Child, *Joint general recommendation No. 31 of the Committee on the Elimination of Discrimination against Women/ general comment No. 189 of the Committee on the Rights of the Child on harmful practices***  
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**United Nation Convention on the Rights of the Child**  
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## WEBSITES

**Keeping Children Safe International Standards**  
<https://www.keepingchildrensafe.org.uk/how-we-keep-children-safe/capacity-building/resource-library>

**Core Humanitarian Standard on Quality and Accountability (CHS)**  
<https://corehumanitarianstandard.org/the-standard>



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