
CHILD PROTECTION POLICY

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1. Foreword

The Psychoanalytic Institute for Social Research (Istituto Psicoanalitico per le Ricerche Sociali, IPRS E.T.S.) by leveraging the tools of psychoanalysis, is engaged in the study of social phenomena, such as distress, marginality, deviance, discrimination, racism and vulnerability.

Alongside its analytical activities, the Institute also participates in a multiplicity of projects at the national and European levels, many of which directly involve minors.

The protection of the rights of the person, and in particular of minors, represents for IPRS E.T.S. the core criterion that guides its entire activity. In projects involving persons of minor age, this principle translates into the creation of an environment of openness to listening, promoting the expression of problems, the detection of signs of distress in minors, and the prevention of all forms of abuse, violence and exploitation without any discrimination of racial, religious, political, cultural or gender nature.

Thus, IPRS E.T.S. deems it essential to formally adopt this document, which constitutes the Policy for the Protection of Children and Adolescents (henceforth the Policy) and imposes shared principles, rules and operational practices.

The Policy complies with the principles and values underlying the main International Treaties that concern the rights of children and adolescents, such as the *Universal Declaration of Human Rights* (1948); the *UN Convention on the Rights of the Child* (1989); the *European Convention on the Exercise of Children's Rights* (1996); the *Charter of Fundamental Rights of the European Union* (2000); the *Constitutional Charter of the Italian Republic* (in particular Article 3). In addition, the Policy takes into account the European document "*The International Child Safeguarding Standard*" and adopts the principle of full recognition of the subjectivity of the minor as a subject of rights, which is the basis of the current national legislation.

2. Objectives and principles of the Policy

The purpose of this document is to protect the rights, freedom, dignity, and interests of minors involved in research and projects carried out by the Institute by establishing ethical criteria and guarantee procedures.

The Policy protects all minors regardless of age, sex, gender, presence of disabilities, geographical origin, ethnicity, socio-economic background, or religious faith. The Institute is also committed to the removal of any barriers to the minor's communication of his or her needs and/or wants.

The Policy pursues the following objectives:

- To establish rules of conduct to protect minors involved in projects or research;
- To identify the activities and circumstances from which harm to persons under age may result (so-called risk areas or risk activities);
- To promote, including through training activities, the awareness of the Institute's employees and collaborators on how to protect minors.

The Policy is to be considered effective in the context of all projects involving the Institute, including in collaboration with other entities or third parties in which minors are involved it is to be considered an integral part of the documentation for individual projects. Adherence to the requirements of the Policy must be accepted in writing by project partners and counterparts. Therefore, Partner organizations shall adopt this Policy or have developed their own having a similar approach and standards.

3. Definitions and general principles

A **minor**, in accordance with Article 1 of the Convention on the Rights of the Child and Adolescent, is defined as a human being below the age of eighteen years.

All activities involving persons underage must be guided by principles of dignity, responsibility and respect.

In carrying out projects involving meaningful and sustained interaction with minors, the ethics of the relationship is of fundamental importance, which must be centered on listening and dialogue with the minor, as well as respect for his or her wishes for interaction with the adult. In particular, the consideration to be given to the will of the minor should be paramount to his or her intellectual, sensory, linguistic and motor abilities, in relation to his or her different developmental stages and social environment.

Respect for the different cultural identities of the people with whom the Institute comes into contact is of fundamental importance.

4. Conduct

The Board of Directors, President, employees, collaborators, interns, and all staff of Partner Institutions:

- Will act at all times with respect for persons of minor age, promoting and protecting their mental and physical well-being and fundamental rights, and respecting their right of expression and manifestation of will;
- In project-related activities, they will protect minors from possible prejudice and exploitation through appropriate prevention methods;
- They will foster the emergence of prejudice suffered by the minor maliciously or due to negligence or inexperience;
- They will take up reports about the prejudice suffered by the minor with the utmost promptness, involving individuals inside and outside the Institute who can be helpful in order to better protect the minor's position;
- They will act in order to protect the confidentiality of those involved in the report. The requirements of confidentiality will not in any case override the duty to inform the competent authorities in the case of suspected crimes;
- They will refrain from conduct that could put the minor in danger;
- They will refrain from conduct that sets a negative example for persons of minor age;
- They should never discriminate against a minor, including avoiding the occurrence of situations that could lead to discrimination;
- They shall treat minors without distinction based on gender, language, religion, political views of the minor, his or her parents or legal representatives, national origin, ethnic or social situation;
- They shall not tolerate or participate in conduct of minors that is illegal, abusive or endangers their safety;
- They will avoid psychological pressure or conditioning in conducting interviews, administering questionnaires or psychological tests that may make the minor feel inadequate or coerced to participate in the project;

- They will use listening modes that respect the different adaptation times of minors and the need for an emotionally peaceful environment. Prior to the start of the activities, they will establish a relationship of trust, in accordance with principles of sensitivity and discretion for the emotional or affective content that may be expressed by the person of minor age and will refrain from manipulative conduct or undue inducements, the proposition of insistent or misleading questions, and suggestive modes of communication;
- They will refrain from collecting data beyond what is strictly essential for the project and for which the minor and parents have given consent;
- They will conduct activities with minors with the consent of the parents or legal guardian.

This list is neither intended to be exhaustive nor exclusive. The principle underlying it is that all recipients of these specifications should refrain from any statement or act that may constitute malpractice or behavior that is potentially abusive or detrimental to the rights of the persons of minor age.

Recipients of the Policy are strictly prohibited from:

- 1) Resorting to corporal punishment of minors;
- 2) Humiliating, discriminating against minors or having a derogatory behavior towards them;
- 3) Having attitudes with minors that may be considered inappropriate;
- 4) Organizing activities that may expose underage persons to risks of abuse;
- 5) Establishing a relationship with minors that may constitute abuse or exploitation;
- 6) Adopting provocative language or behavior towards minors;
- 7) Infringing upon the privacy of minors;
- 8) Taking photos or recording videos that may cause harm to minors;

Recipients of the document are expected to abide by the principles of this Child Protection Policy even outside the Institute.

5. Consent

The minor and the parent or legal guardian must be enabled to give a knowledgeable and informed consent to participate in the project or research. To this end, the Project Manager shall provide all the information necessary for the assessment in a form that is clear and easily understood even by the person of minor age. In dealing with the minor, in particular, the Project Manager must ensure the use of a simple, straightforward language, appropriate to the minor's ability to understand.

The minor's contrary will must be considered as overriding the favorable will of the parent or legal guardian.

The consent form should lay down explicitly the benefits and potential risks of participation in the project for the minor, the person responsible for processing collected data, the use of the data being processed, the measures taken to protect the confidentiality of the data, and the purpose of the project.

In long-term projects, there should be arrangements for reviewing or withdrawing consent in order to consider the minor's evolving capacity to understand and to confirm consent if the minor reaches the age of majority.

6. Sanctions

Violation of this Policy and failure to comply with the responsibilities arising from it may result in disciplinary action being taken against employees, as well as the termination of any professional or business relationship with collaborators or project partners.

The Institute may also take legal action for violations of this Policy in order to protect its image and the minor persons harmed by the offending conduct.

7. Selection and recruitment of personnel

The recruitment and selection of personnel reflects the Institute's commitment to the protection of persons of minor age, ensuring that communications, controls, and procedures are in place to exclude anyone unsuitable to work with minors.

Applicants for positions involving direct contact with minors are selected on the basis of specific skills and prior experience and are advised of the binding nature of this Policy.

At the hiring stage, it is verified that their status is free of criminal convictions or pending charges for crimes against minors. The resumes of selected candidates are kept by the Personnel Office together with the documentation concerning the employee.

At the time of hiring employees or upon collaboration agreement for trainees or external collaborators, a copy of this Policy is provided and a specific clause referring to child protection policies is included and must be accepted signed and underwritten for acknowledgment.

8. Risk assessment and identification

All projects involving persons of minor age must be assessed in advance in order to identify any risks to them and provide appropriate countermeasures and protection for the minor.

The Project Manager shall prepare a form concerning the above assessment, that will be kept together with the documentation related to the project itself.

9. Confidentiality of information and privacy

Every activity of IPRS E.T.S. is carried out in full compliance with the principles of confidentiality and protection of data and information related to persons of minor age. The institute has taken the necessary, appropriate and suitable measures for the best protection of data of minors according to Reg. Decree 2016/679 on privacy, and the recipients of this Policy are required to fully comply with the directives issued by the Institute on the processing of personal data (IPRS E.T.S. Privacy Regulations available on www.iprs.it at the following address <https://www.iprs.it/wp-content/uploads/2018/10/Informativa-sulla-privacy-DEF.pdf>).

Confidential information of which the recipients of this document should become aware, in the course of carrying out their activities, shall not be disclosed externally, nor shall it be used to achieve positions of privilege, obtain benefits, or for other personal purposes.

10. Dissemination and awareness. Staff training.

IPRS E.T.S shall ensure wide dissemination of the Policy among all Board members, employees, collaborators, organizations and entities with which the institution deals as a project partner, as well as minors.

In disseminating the Policy, IPRS E.T.S. shall ensure that it is fully understandable to all; to this end it may provide for the use of translations into the language of the beneficiaries and the production of child-friendly materials.

The principles of the Policy must be included in the initial and ongoing training of staff.

At the beginning of each new employment relationship, IPRS E.T.S. shall provide a copy of the Child Protection Policy as well as all information necessary to prevent and identify any form of risk present in the projects they oversee. All staff of IPRS E.T.S. must state that they have received and are familiar with this Policy.

IPRS E.T.S. is committed to ensuring support, supervision, and periodic training that is appropriate to the knowledge of the staff and shared in a participatory manner, so as to encourage employees to express any problems and critical issues.

In particular, for each new employee or collaborator, the Institute undertakes to carry out an appropriate training involving the basic principles of this Policy; definitions of possible forms of mistreatment and exploitation and signs to recognize them; as well as reporting procedures in case of suspected violation of the Policy.

IPRS E.T.S. ensures wide dissemination of the Child Protection Policy among all employees, collaborators, minors and their parents/guardians involved in activities and projects.

In particular:

- The Policy is published on the Institute's website (www.iprs.it);
- The principles of the Policy are referred to in specific clauses that are included in all contracts and partnership agreements. By signing the contract or agreement, acknowledgment and acceptance of these clauses is declared from the date of its approval forward;
- A copy of the Policy is distributed to all employees and contractors of IPRS E.T.S;
- The basic principles of the Policy are referred to in communication and presentation materials of IPRS E.T.S. to funders and project partners;

- To ensure that the Policy is fully understood, IPRS E.T.S. is committed to implementing child-friendly versions of the Policy.

11. Information and communication technologies

In the use of communication media such as the Internet, websites, and social networking sites, IPRS E.T.S. takes the utmost care to ensure that persons of minor age are not exposed to any possible risk.

The Institute's communications must be respectful of the dignity of minors. Their images should be selected with respect for their person and published only after receiving the consent of their parent or legal guardian.

The Manager in charge of the project in which minors are involved:

- a) Before recording, photographing, or filming a minor must seek his or her consent and that of his or her parent or guardian. The Manager shall also inform and explain how the material collected will be used and handled;
- b) In recording, photographing, or filming a minor, he or she must respect the minor's cultural and religious traditions and avoid potentially stereotypical, discriminatory, and sensationalist messages;
- c) May post videos or photographs only if they are respectful of the minor's dignity and free of sexual references. Photographs must not exploit images of pain or suffering or be offensive;
- d) Minor's details may be published only where absolutely necessary and, in any case, publication must be limited to name, age and country of origin. Additional references must be agreed to and authorized by the subject.

The handling of children's data must be done in compliance with European Regulation 679/16 and only with the consent of the parents or guardian.

12. Internal reporting system

IPRS E.T.S. has adopted the **procedure for reporting violations** published at the end of this document (*ATTACHMENT A*).

On behalf of the Board of Directors, the President of IPRS E.T.S. serves as the Child Protection Officer, and is responsible for handling any *reports of child abuse*.

The role of the Child Protection Officer shall be publicized and disclosed within the Institute, including through the dissemination of this Policy, encouraging prompt reporting of suspected abuse or maltreatment. IPRS E.T.S. provides the necessary tools to report all forms of maltreatment, adopting reporting tools that are also suitable for use by the minor.

Reporting can be made by a minor, parent, guardian, family member, employee, or member of other partner organizations. Reports may relate to any suspected conduct detrimental to the minor's rights and violation of this Policy. Reports may be made in writing, by email, through a phone call, request for an interview, letter, or any other manner that allows anyone to exercise their right to self-advocacy.

IPRS E.T.S. guarantees the utmost confidentiality in the handling of reports. In handling reports, the Institute operates with respect for victims and witnesses, ensuring that their rights to confidentiality, equality and access to justice are respected.

13. External reporting system

The Child Protection Officer undertakes to report to the Judicial Authority violations of these regulations that may constitute criminal offenses.

14. Responsibilities in Policy implementation

Child protection is a responsibility shared by all members of the Institute.

The President and the staff of IPRS E.T.S., each according to his or her operational functions, are responsible for creating a work environment conducive to the implementation and development of the principles of this Policy.

The President in exercising the function of Child Protection Officer may appoint a delegate for the dissemination and updating of the Policy, selecting him or her from among staff members who do not carry out activities in direct contact with minors.

The Child Protection Officer is responsible for:

- Disseminating this Policy within IPRS E.T.S.;
- Collecting reports of suspected abuses to the rights of minors, notifying the Judicial Authority where necessary;
- Propose periodic updates to this Policy or appoint a delegate to update it. Specifically, every two years, the CPO will evaluate the effectiveness of the Policy and whether implementation procedures need to be implemented. The CPO will prepare a special report of the evaluation that will be retained by the Institute.

ANNEX A

A. PROCEDURE FOR REPORTING VIOLATIONS

The President of the Institute undertakes the functions of Child Protection Officer (CPO) and is responsible for the enforcement of the Child Protection Policy, receives and handles any reports of abuse and more generally of violations of the Child Policy.

A minor, a parent, guardian, family member, each employee or collaborator of IPRS and project partners are authorized to issue a report. The recipient of the report is the Child Protection Officer.

The subject of the report is any suspicion of harmful or improper behavior, as well as any violation of this Policy.

If the CPO receives a report, he/she will initiate a verification procedure to ascertain the actual existence of the reported violation. For this purpose, he or she may hear the minor involved, his or her parents or guardian as well as those working within the project in which the violation allegedly occurred. He or she shall draw up a record of such hearings. The Child Protection Officer may also collect documentation about the incident.

The CPO shall inform the person concerned of the reports that have been made against him or her so as to give the person an opportunity to present his or her version of the events in question.

The person who is the subject of the report may be temporarily suspended from his or her activities, if involving minors, during the course of the internal investigation.

The issuer of the report will be periodically informed about the progress of the activated procedure.

Any alleged violation of the Child Policy must be reported and investigated.

Violations of the Policy constitute a disciplinary offense that may also be sanctioned by termination of the employment contract.

In order to ensure an easily accessible reporting procedure for the minor, there are no special formalities in submitting the violation to the CPO. The violation may be reported in written form (emails, letters, communications of any kind) or in oral form.

The Manager will draft a minute of the reports received in oral form, signed by the whistleblower.

The reporting procedure guarantees the confidentiality of all persons

involved. The name of the persons who made the report, the subject of the report and the identity of the accused person will not be disclosed, without prejudice to legal obligations and communications to the Judicial Authority.

The accused person, by virtue of the legal principle of presumption of innocence, will be presumed innocent until proven guilty.

The Institute is committed to opposing any form of intimidation, retaliation or reprisal against the whistleblower or the person who provides input to the investigation.