CHILD PROTECTION POLICY

felcos

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1. POLICY

Keeping children safe represents a commitment for **FELCOS Associazione di Comuni e Enti Territoriali per lo Sviluppo Sostenibile e la Cooperazione Internazionale**, operating through territorial, multi-level and multi-actor approaches, that promotes sustainable development, good governance practices and social and economic growth, both locally and internationally, where children are potentially impacted. The main priority is to meet responsibilities set out either in the UN Convention on the Rights of the Child (1989) – to protect children from all forms of violence, exploitation, neglect and abuse – and in *Linee guida sull'infanzia e l'adolescenza nella cooperazione internazionale allo sviluppo* (AICS, 2022) issued by the Italian Agency for Development Cooperation. Moreover, FELCOS activities are fully guided by the principles underpinned by the UN 2030 Agenda for Sustainable Development and the implementation of its 17 Sustainable Development Goals, which guide its vision and values in planning and implementing any kind of activities. FELCOS activities are also aligned with the EU Strategy on the Rights of the Child (2021–2024) and with the Council Recommendation establishing a European Child Guarantee (2021).

2. COMMITMENT

FELCOS adopts a child safeguarding approach, recognizing safeguarding as an organizational responsibility to prevent harm, reduce risks, respond appropriately to concerns, and promote safe environments for all children participating in or affected by its activities. FELCOS is fully committed to ensuring children's right to be fully involved in the determination of their future, when talking about sustainable development and commitment to a better world. FELCOS engages children and adolescents directly and indirectly in its activities; hence, it has a legal and moral duty of care to do all it can to protect them from possible harm. FELCOS team is fully committed to safeguarding the well-being of all children and young people and to promoting their rights, including participation in matters that affect them. The main aim is to create a healthy and safe environment which enhances and improves ongoing and planned projects that seek children and young people's participation and contribution. All youth have the right to be protected.

The following policy refers to actions that address how the association's practices impact children's welfare and rights:

- ***Non-discrimination:*** FELCOS is fully committed to ensuring that each child is protected against all forms of discrimination or punishment on the basis of the status

activities, expressed opinions, or beliefs of the child's parents, legal guardians, or family members.

- ***Equal treatment:*** FELCOS shall ensure that no child shall be discriminated against because of their gender, origin, nationality, language, religion, skin color, disability, or political views.
- ***Child welfare:*** In all actions concerning children, the best interests of the child shall be a primary consideration as overarching principle of children's rights.
- ***Freedom of expression:*** FELCOS recognizes the child's right to freedom of expression; this right shall include freedom to seek, receive and impart information and ideas of all kinds, regardless of frontiers, either orally, in writing, in print, in the form of art, or through any other media of the child's choice.
- ***Freedom to manifest one's religion***: In the implementation of its activities and when involving children, FELCOS shall respect and uphold children's freedom of thought, conscience and religion.
- ***Child labor:*** FELCOS represents and warrants that neither it, its parent entities (if any), any of the organization's subsidiary or affiliated entities nor personnel are engaged in any practice inconsistent with the rights set forth in the UN Convention on the Rights of the Child, which, inter alia, requires that a child shall be protected from performing any work that is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical mental, spiritual, moral or social development;
- ***Sexual Exploitation***: FELCOS shall not engage in any conduct that would constitute sexual exploitation or sexual abuse. FELCOS shall take all appropriate measures to prevent sexual exploitation or abuse of anyone by the organization's Personnel. Sexual activity with any person less than eighteen years of age, regardless of national laws relating to consent, shall constitute sexual exploitation and abuse. FELCOS shall prohibit any exchange of money, goods, services, or other advantages for sexual favors or activities and prevent any conduct that is exploitative or degrading to any person minori (*Presidenza del Consiglio dei Ministri –*

Dipartimento per le Politiche della Famiglia, 2022), ensuring full compliance with measures aimed at preventing all forms of violence, exploitation, and abuse.

Moreover, in adherence to the Sustainable Development Goals, FELCOS is inspired by its guiding principles when running activities involving children and youth, primarily in:

- **Goal 3. Ensure healthy lives and promote well-being for all at all ages;**
- **Goal 4. Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all;**
    - o **4.5 by 2030, eliminate gender disparities in education and ensure equal access to all levels of education and vocational training for the vulnerable, including persons with disabilities, indigenous peoples and children in vulnerable situations**
- **Goal 10. Reduce inequality within and among countries;**
    - o 10.2 By 2030, **empower** and **promote** the **social, economic and political inclusion of all**, irrespective of age, **sex**, **disability**, race, ethnicity, origin, religion or economic or other status
- **Goal 16. Promote peaceful and inclusive societies, provide access to justice for all, and build effective, accountable, and inclusive institutions at all levels**;
    - o 16.2 **End abuse, exploitation, trafficking** and all **forms of violence against** and **torture of children**;
    - o 16.7 Ensure **responsive, inclusive, participatory and representative decision- making at all levels**;
    - o **16.7.1 Proportions of positions in national and local institutions,** including (a) the legislatures; (b) the public service; and (c) the judiciary, compared to national distributions, by sex, age, persons with disabilities and population groups.

3. CHILD PROTECTION IMPLEMENTATION PLAN

The definition of the implementation Plan is in charge of the Board of Directors, that validate and approves the document stating the commitment and indicating the modality and procedures for the implementation of the CPP. To this purpose, a Child Safeguarding Committee is appointed, which is in charge of the definition of the procedures and of the identification of a focal point responsible for the implementation of the CPP internally and externally. The Plan foresees the publicization of the Policy in an appropriate manner, together with its promotion and distribution among the network of stakeholders participating or involved in the implementation of FELCOS activities.

Whenever this Policy is substantially revised, all relevant staff and collaborators shall receive updated safeguarding information and, where appropriate, refresher training.

4. GOVERNANCE AND RESPONSIBILITIES

The effective implementation of this Child Protection Policy is a shared responsibility across the governance, management and operational structures of FELCOS. In accordance with the Statute of the Association, child safeguarding is embedded in the organisation's governance, management, programme implementation and partnerships, ensuring that the protection and well-being of children are systematically integrated into all relevant activities.

4.1. Board of Directors

The Board of Directors is responsible for:

- approving and periodically reviewing the Child Protection Policy and related procedures;
- ensuring that adequate organizational, human and financial resources are allocated for the effective implementation of child safeguarding measures;
- promoting a culture of safeguarding, accountability and continuous improvement throughout the organisation;
- monitoring the overall implementation of the Policy and ensuring compliance with applicable legislation and donor requirements.

4.2. Director

The Director is responsible for the operational implementation of the Policy throughout the organisation and shall:

- ensure that safeguarding requirements are integrated into organisational procedures and project management;
- appoint and supervise the Child Safeguarding Focal Point;
- ensure that staff, collaborators and partners receive appropriate guidance and training;
- ensure that safeguarding concerns are managed promptly, appropriately and confidentially;
- report significant safeguarding issues to the Board of Directors where appropriate.

4.3. Child Safeguarding Focal Point

FELCOS designates a Child Safeguarding Focal Point responsible for coordinating the implementation of this Policy.

The Focal Point shall:

- provide guidance and advice on safeguarding matters;
- receive safeguarding concerns, allegations or complaints;
- maintain confidential safeguarding records;
- coordinate the initial assessment of reported concerns;
- support project teams in carrying out safeguarding risk assessments;
- coordinate referrals to competent authorities where required by law or organisational procedures;
- promote awareness of safeguarding responsibilities across the organisation;
- contribute to the periodic review of the Policy.

4.4. Project Managers

Project Managers are responsible for ensuring that safeguarding measures are integrated throughout the project cycle.

In particular they shall:

- identify safeguarding risks during project design;
- implement appropriate mitigation measures;
- ensure that staff and partners involved in project activities understand and comply with this Policy;
- promptly report safeguarding concerns to the Child Safeguarding Focal Point;
- monitor safeguarding measures during project implementation.

4.5. Staff, Consultants and Volunteers

All employees, consultants, interns, volunteers and external experts working on behalf of FELCOS shall:

- comply with this Policy and the Code of Conduct;
- contribute to maintaining safe environments for children;
- participate in safeguarding training where required;
- immediately report any safeguarding concern, suspicion or allegation;
- cooperate fully with safeguarding procedures and investigations.
- Failure to comply with this Policy may result in disciplinary measures or, where appropriate, termination of contractual relationships.

4.6. Partners and Contractors

FELCOS expects all implementing partners, contractors, service providers and collaborating organizations involved in activities concerning children to uphold safeguarding standards equivalent to those contained in this Policy. Where appropriate, partnership agreements shall include safeguarding clauses requiring partners to:

- adopt or adhere to a Child Protection Policy;
- ensure their personnel receive appropriate safeguarding information;
- promptly report safeguarding concerns affecting FELCOS activities;
- cooperate with safeguarding investigations and corrective measures.

5. SAFE RECRUITMENT

FELCOS recognizes that safe recruitment and selection procedures are essential elements of preventing harm to children and creating safe organizational environments.

Whenever personnel may have direct or indirect contact with children through FELCOS activities, appropriate safeguarding considerations shall form part of recruitment, selection and engagement procedures.

Depending on the nature of the role and applicable national legislation, recruitment procedures may include:

- assessment of the candidate's suitability for working with children;
- verification of relevant qualifications and professional experience;
- verification of professional references where appropriate;

- consideration of previous safeguarding-related concerns where legally permissible;
- discussion of safeguarding responsibilities during interviews for relevant positions.

Before commencing activities involving children, all relevant personnel shall:

- receive a copy of FELCOS Child Protection Policy;
- formally acknowledge their understanding of the Policy;
- sign any safeguarding declarations required by the organization;
- receive an introductory safeguarding briefing appropriate to their role.

Where safeguarding responsibilities are significant, additional induction or role-specific training shall be provided before the individual begins activities involving children. FELCOS reserves the right not to appoint, engage or continue collaborating with any individual whose behavior, professional conduct or previous experience raises reasonable safeguarding concerns, in accordance with applicable legislation and organizational procedures.

6. PROCEDURES

6.1. CHILD RISK ASSESSMENT AND MITIGATION STRATEGY

FELCOS creates a child-safe environment through implementing child safeguarding procedures applied across the organization. Child safeguarding measures need to be incorporated throughout FELCOS' system, actions, processes and operations to ensure that the environment is child safe. How to avoid risk is a major part of the association's working strategy: risk assessment involves stages such as contextualizing, identifying the potential impact on or contact with children, evaluating risks (in terms of likelihood and seriousness of the impact), implementing strategies to minimize and prevent risk, communicating, confronting and consulting.

Risk assessment will integrate identification and management of the risks, and the identification of the measures of mitigation and the responsible for activating them.

Operating in different international contexts, FELCOS will ensure that Child safeguarding measures shall be sensitive to the local culture. The organization partners shall be risk assessed in each locality and strategies developed for integrating child safeguarding where relevant. Organizations also need to be prepared to act locally when concerns arise or to report to the FELCOS focal person to adopt mitigation measures or interventions to remove the causes of potential risk. **Every FELCOS project involving children shall include a documented Child Safeguarding Risk Assessment before implementation.**

7. PUBLICIZING THE POLICY

The policy should be made available to all staff and associates, partners, children and communities.

To this extent, FELCOS will distribute and inform all partners and stakeholders about the policy of the Implementation Plan; will diffuse the identity of the focal point and its contact, will inform about the risk management and mitigation procedure and will provide basic training to staff and experts involved in activities with children. Collaborators involved in activities with children will sign a commitment letter, annexed to the letter of contract/of engagement, declaring their knowledge and understanding FELCOS Child Protection Policy and committing to its respect.

8. DATA PROTECTION, CONFIDENTIALITY AND INFORMED CONSENT

FELCOS is committed to protecting the privacy and personal data of all children participating in its activities, in accordance with Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR) and applicable Italian legislation.

Personal data relating to children shall be collected and processed only where necessary for legitimate project purposes and in accordance with the principles of lawfulness, fairness, transparency, data minimisation and confidentiality. Access to such information shall be restricted to authorised personnel only, and records shall be securely stored and retained only for the period necessary to fulfil legal and operational requirements.

The collection and use of photographs, videos or other audio-visual material depicting children shall require the prior informed consent of parents or legal guardians, unless otherwise permitted by applicable legislation. Any communication materials shall respect the dignity, privacy and best interests of the child and shall avoid any form of discrimination, exploitation or stigmatisation.

9. REPORTING PROCEDURES

Any member of staff, consultant, volunteer, partner or other person acting on behalf of FELCOS who becomes aware of, witnesses or suspects that a child may be at risk of harm has a duty to report the concern without delay.

Safeguarding concerns shall be managed according to the following procedure:

- Identification of the concern or disclosure by a child;
- Immediate action to ensure the child's safety where necessary;
- Reporting to the Child Safeguarding Focal Point as soon as possible;
- Confidential recording of the concern and preliminary assessment of the information received;
- Safeguarding risk assessment to determine the appropriate response;
- Referral to competent authorities or specialised services where required by law or organisational procedures;
- Follow-up and closure, ensuring appropriate documentation, monitoring and learning.

All reports shall be handled confidentially, respecting the privacy of those involved while ensuring that the child's best interests remain the primary consideration.

10. PEOPLE

Everybody connected with FELCOS must be informed and have appropriate knowledge and means to ensure a child's safe conduct.

Partners, including donors, local NGOs, government, contractors, and suppliers, all need to agree to a commitment to keep children safe that is appropriate to that partnership.

In any case, the key staff will inform and provide all necessary information and will require a formal commitment to the respect of the CPP adopted.

Key staff and personnel involved as focal points that might be involved in activities requiring the respect of the Child Protection Policy are those in the following areas:

- Development and cooperation area;
- Development education, awareness raising and social inclusion area;

- Project design area;
- Research and Innovation
- Strategic planning and SDGs localization area;
- Financial reporting and accounting area;
- Communication area.

Communications between the organization and parents/carers/community leaders should take account of language or communication differences. Make sure that parents, children and relevant others know about your child safeguarding commitments and measures. FELCOS, will also encourage parents/carers/community involvement as much as possible, through, for example, membership on committees or steering/planning groups as well as involvement in project activities.

11. COMPLAINTS AND SAFEGUARDING FEEDBACK MECHANISM

FELCOS provides accessible, safe and confidential mechanisms through which children, parents or legal guardians, staff, volunteers, consultants, partners and community members may raise safeguarding concerns, submit complaints or report inappropriate behaviour related to activities implemented by the organisation.

Complaints may be submitted verbally or in writing through the communication channels identified by FELCOS and shall be received by the Child Safeguarding Focal Point or another designated person where appropriate. All complaints shall be treated confidentially, assessed promptly and managed fairly, impartially and without discrimination. FELCOS is committed to protecting complainants and whistleblowers from retaliation or adverse consequences resulting from reports made in good faith.
Where appropriate, complainants shall receive information on the progress and outcome of the complaint, within the limits imposed by confidentiality and data protection obligations. If a complainant is dissatisfied with the outcome, they may request that the matter be reviewed by the Director, who shall ensure an impartial reassessment of the case in accordance with FELCOS procedures.

These three additions are proportionate to the size of the policy while substantially

strengthening its compliance with current European Commission safeguarding expectations. They also integrate well with the governance section by giving the **Child Safeguarding Focal Point** a clearly defined operational role.

12. ACCOUNTABILITY

12.1. REGULATORY MONITOR PROGRESS AND LESSONS LEARNED

Throughout FELCOS latest activities, both staff and personnel monitored and reviewed its safeguarding measures by:

- implementing safeguarding policies and procedures that are regularly monitored and updated;
- reporting progress and performance to key stakeholders and including safeguarding-related information in organisational and project reports;
- using lessons learned from practical case experience to inform policy reviews and strengthen child safeguarding measures;
- regularly reviewing safeguarding policies and practices across projects and subjecting them to periodic external evaluation.

All key staff, experts, trainers, service providers in contact with children in the implementation of activities coordinated or promoted by FELCOS, will be involved in the monitoring and reporting procedures.

Progress, performance and lessons learnt are reported to key stakeholders (management forums and external or independent bodies where relevant) and included in organizations' annual reports.

All partners and stakeholders are permanently informed about the results of the review reporting

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