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LINES OF CONDUCT FOR CHILD SAFEGUARDING
AND PROTECTION

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Child Safeguarding and Protection Policy (CSPP)

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The scope and purpose of a CSPP

The overall scope of this Child Safeguarding and Protection Policy (from here on CSPP) is to promote and guarantee the rights of children and adolescents towards protection from all forms of abuse, neglect, exploitation and violence¹ as well as to encourage active listening of their ideas and opinions.

The Policy is vital to protect:

- ✓ children and adolescents in order to minimise the risks to which they are exposed;
- ✓ CIAI staff and volunteers, who must know how to behave and how to manage concerns relating to their safety;
- ✓ the organisation itself and its partners so as to reduce their vulnerability to unfounded accusations.

This Policy is an integrative part of the following internal policies:

- Safeguarding Policy (SP)
- Code of Conduct (CoC)
- Whistleblowing Policy (WP)
- Policy on Conflict of interest (PCol)

Policy addressees

CIAI commits to ensure a child-safe environment through an active and participatory process of all stakeholders involved in its activities and projects.

The Policy is addressed to employees, staff and contributors in the following categories (whom from hereafter represent the "Policy addressees"):

- ✓ Board of directors and supervisory bodies;
- ✓ All employees, collaborators and volunteers;
- ✓ Partners and entities with a signed partnership agreement;
- ✓ Consultants and service providers;
- ✓ Contractors/subcontractors;
- ✓ Other individuals who have signed a contract with CIAI.

The Policy addressees agree to it by signing the Declaration of Commitment (Annex 3) and are called to respect its principles at all times, both during working hours and in their personal life.

- ✓ **All Staff, Volunteers and Board of Directors.** CIAI provides a guide (Annex 1) to all members of CIAI staff, volunteers and Board of Directors as to what harm and abuse is, on potential risks, preventive strategies expected behaviour and appropriate boundaries to be respected when working with children and adolescents. It aims to reduce the risk of violence and assist in creating a respectful and

¹ VIOLENCE: any non-accidental behaviour carried out by parents, guardians, other adults or other children, which results in potential or actual harm of the health, development or dignity of a child or adolescent. Such behaviours can be intentional or unintentional and include both acts of omission (e.g. negligence) and commission (e.g. abuse).

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safe environment. The Policy also serves to protect the rights and welfare of the listed Policy addressees providing clear guidance in their interactions with children and adolescents. It is expected that all CIAI personnel comply with the Policy, in particular with the Code of Conduct.

- ✓ **Partners and organisations with a signed agreement.** Partners are called to respect the terms of the Policy and to give their active support and cooperation for its fulfilment. In the event that the partner does not have an operational CPP (Child Protection Policy) that complies with the minimum standards, the CIAI CSPP and CoC must be shared with the partner and signed by its Legal Representative.
- ✓ **Consultants, service providers and contractors/sub-contractors.** Key principles are applicable to suppliers in direct contact with beneficiaries. CIAI CSPP and CoC must be shared with and signed by these individuals.

Responsibility

CIAI is committed to respecting, disseminating and monitoring the application of the Convention on the Rights of the Child. CIAI expresses great concern around the high prevalence grave of violations of Children's rights, often victim of physical and psychological abuse, physical punishment, sexual abuse and sexual and economic exploitation, as well as negligence and the lack of alternative measures for children care when families are unable to guarantee such responsibility.

CIAI's commitment to protect children is founded on four main principles:

- ✓ **Awareness:** to ensure that the Policy addressees and all other individuals involved (the community, the children) are aware of child abuse and the risks associated with working with children;
- ✓ **Prevention:** to ensure that through awareness, good practices, a safe environment and the active participation of children risk will be minimised;
- ✓ **Reporting:** to ensure that the Policy addressees and all other individuals involved (the community, the children) are aware of the steps to be undertaken in case concerns emerge in regard to the safety of children;
- ✓ **Response:** to ensure that action is taken to support and protect children and assist staff and volunteers in case concerns should emerge.

In case the Policy addressees do not comply with the principles of this Policy, CIAI reserves the right to withdraw funding and/or terminate any existing agreement or contract.

Severe or repeated violations of the Policy may require strict disciplinary measures, such as the termination of the employee's contract. Further measures may be taken, such as reporting to the Authorities according to the terms established by the Italian Law.

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Awareness

Understanding children and adolescents and recognizing the forms of violence and the harm tied to it, is the foundation of a child-safe environment. In *Annex 1 - Terminology* you can find definitions and useful examples to aid identification of the possible forms of abuse and exploitation.

This Policy is shared with:

- **Children.** Children participate in the implementation of the Policy. In order to create an active and reactive culture of safety it is required that children:
 - ✓ are listened to
 - ✓ have the right to express their opinions and to have them heard
 - ✓ understand child abuse and are knowledgeable about preventative behaviours
 - ✓ learn about their rights and protective strategies in order to take an active role in the protecting and safeguarding of themselves and other children.
- **Families and caregivers.** The real strength of a child-safe organisation lies in the capacity and willingness of its members - including the children and their families and caregivers - to bring the Policy to life through a clear understanding of children's rights.
- **The community and all other relevant stakeholders** (donors, government officials and networking partners). CIAI communicates its commitment to child safety to all stakeholders and involved parties.

For every action and/or project the principles of this Policy will be shared with all children targeted by CIAI, with their families and guardians, and with the community **in a way that is understandable to them.**

Prevention

A. HUMAN RESOURCES

To ensure child safety, it is fundamental to select staff, collaborators and volunteers who respect and reflect CIAI's commitment to child protection.

When recruiting new staff CIAI assesses:

- motivation to work with issues regarding children
- attitude and ability to respect towards children's rights
- understanding of children's physical and emotional needs within their local context
- knowledge on discussions generated at the international level on sensitive subjects such as international adoption
- values such as honesty, non-discrimination, reliability and integrity
- references received from previous employers
- Criminal record. All CIAI staff are required to undergo a criminal record inspection. In the case this is not possible the individuals must provide a self-declaration of absence of penalties (Annex 3)

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The Board of Directors presents responsibilities the staff must undertake according to their role within CIAI with regard to the application of the Policy:

- **All staff and volunteers:** must comply with the Policy, Code of Conduct and other Policies signed by them.
- **All program, project and action managers:**
 - must ensure that the addressees and the community are informed about the Policy and the means of reporting.
 - are required to ensure that partners have a Policy or sign the CIAI CSPP.
- **The CEO, sector managers and office managers:** must ensure that new hires and volunteers undergo training on the Policy and that all staff under their responsibility are kept up-to-date on possible changes.
- The CEO appoints a **Child Protection Officer** working at the headquarters, who coordinates and assists the staff (also in other offices) in the application of the Policy (Annex 2: Child Protection Officer (CPO) and Focal Point (FP)).

B. SELECTION OF PARTNERS

Selecting suitable partners is essential to ensure children's safety.

When selecting partners CIAI assesses:

- understanding of children's physical and emotional needs within their local context
- shared missions, values and strategies
- sharing and signing of both the Policy and the CIAI CoC: in the event that the partner does not have a CPP and a CoC which reach the minimum standard, the Legal Representative of the partner organisation must sign the CIAI Policy and CoC.

In addition, agreements with partners includes:

- constant and sustained discussion related to child protection and the approaches tied to it
- if necessary, support in developing a child policy
- involving partner organisations in CIAI Child Protection Policy reviews (See section 'Response')

C. PROJECTS AND ACTIVITIES

A **risk assessment** is carried out for each project and activity. It is conducted using a participatory approach, evaluating the potential impact on the children and adolescents involved and identifies appropriate strategies to reduce risks to a minimum. Allocation can happen in 3 risk categories:

- ✓ **LOW RISK:** projects and activities which do not require any contact with children
- ✓ **MEDIUM RISK:** projects and activities which foresee contact with children (such as visits, surveys, class activities, etc.)
- ✓ **HIGH RISK:** projects and actions which foresee frequent and continuous contact and work with children such as within educational centres, campuses, during tutoring (on-site and online), orientation activities, etc. This is of high importance when activities are carried out one-to-one.

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In case risk assessment is not carried out or, the risks cannot be reduced or mitigated, the project or activity will not be approved by Management.

Each project must realise a Guide on proper ethical behaviour in relationships between adults and children, which responds and reflects the identified risks and needs.

The communication of the projects and activities must always be respectful of the dignity of children:

- ✓ their stories and images must be selected in compliance with their best interest in mind and published only after receiving consent from the child and the parent/legal guardian
- ✓ all images must portray the children in a rightful and respectful manner and not as victims
- ✓ project titles must highlight the objectives and results in positive light rather than through the problems and vulnerabilities of the project context
- ✓ images portraying the children must consider their clothing and attitudes

Furthermore, **project supporters, visitors and/or other individuals who interact with the addressees** within an action promoted by CIAI must follow and respect the following rules:

- ✓ provide their personal identification data
- ✓ agree to and carefully follow the instructions of the staff who guides the visits or activities
- ✓ donations must be agreed in advance
- ✓ the use of language or behaviour that is disrespectful, sexually suggestive, humiliating or culturally inappropriate towards minors are forbidden
- ✓ smoking, substance use or consumption of alcoholic beverages is forbidden in all CIAI places and spaces
- ✓ photographing and/or filming is forbidden without prior authorization
- ✓ Personal data exchange with any minor participant in CIAI projects is prohibited
- ✓ Meetings with a child must be organised with the mandatory the presence of at least two adults (one part of the CIAI Staff): meetings one to one between a minor and an adult must be kept to a minimum
- ✓ during online meetings/video conferences with minor addressees, sessions must be recorded, foresee the co-presence of a CIAI authorised person and/or have another form of control method. It is recommended that children under the age of 14 are attended by a trusted adult nearby (nominated by the child itself).

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D. A CHILD-FRIENDLY ENVIRONMENT

At the centre of all efforts in eliminating violence against children are the children themselves. They must be involved at all levels in tackling this issue head on. This involvement ensures that children grow conscious of their rights and responsibilities. A welcoming, safe and child-friendly environment secures the fulfilment of these processes.

An environment is child-friendly when:

- ✓ children's opinions and needs are considered and included
- ✓ peace and gender equity are upheld and respected; discrimination and prejudice are not accepted
- ✓ children are listened to and encouraged to participate
- ✓ healthy lifestyles and life skills (cognitive, relational and emotional) are promoted
- ✓ the space is accessible to all, including those with special needs and disabilities
- ✓ the space is decorated with child-friendly colours and their ideas and suggestions
- ✓ children have an active role in the learning process
- ✓ in the case of educational centres, where children spend time and complete activities, a code of conduct, for children made by the children, should be put in place
- ✓ it is safe and secure: free from violence, abuse, exploitation and trafficking meaning all staff should apply the Policy and Code of Conduct at all times.

Reporting and response

To guarantee the right of children to protection, it is fundamental to provide a simple and transparent procedure for reporting any suspects of abuse or mistreatment.

Who can file a report? All children, parent(s), relatives(s), staff member(s), volunteer(s), member(s) of the Board of Directors, partner(s), the community.

What can be reported? Any suspicion regarding inappropriate behaviour detrimental to the rights of children to protection, and any concern regarding child-safety and violation of the Code of Conduct.

How to file a report? By means of, but not limited to, a verbal report, written report, phone call, email, meeting, a letter.

To whom to report? To the project responsible (Focal Point), to the Child Protection Officer (CPO) or, alternatively, to the sector manager, office manager or general management. Upon reporting, the case management procedure is initiated.

The Management appoints a Child Protection Officer (CPO) who is entrusted with the coordination of activities directed to the staff for correct Policy application and use (Annex 2). In addition to the CPO, the CEO appoints the Project coordinators (Focal Point - FP) who must ensure that the project addressees and the community are informed about the Policy and on how to file reports (Annex 2: Child Safeguarding and Protection Officer (CPO) and Focal Point (FP)).

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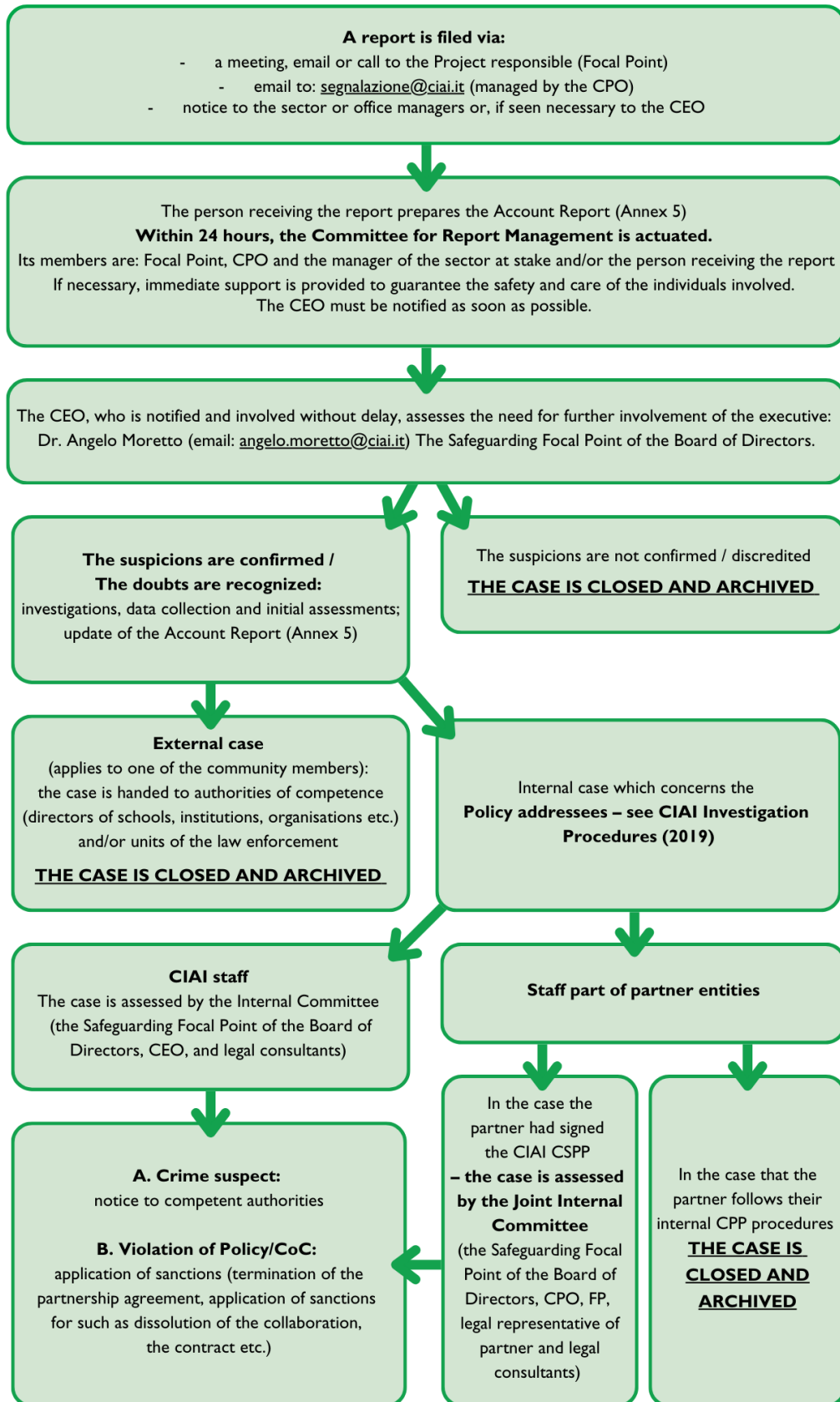
The reporting procedure for all projects and activities must be clear, accessible and must advance the best interests of the children and must process the following two key values:

1. **Confidentiality:** the identity of anyone reporting a case of abuse and the reason for filing the complaint must remain secret. This is possible up until the person may be called to testify in trial.
2. **Fairness:** the accused individual, if a Policy addressee, will be supported to the best of CIAI's ability in virtue of the legal principle of presumption of innocence and will be presumed innocent until proven guilty.

In order to ensure appropriate support, projects and actions must present a risk and assistance fund, in addition to the resources that CIAI can/could promptly mobilise.

The procedure for **cases reporting and response** to potential high-risk situations is the following:

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Monitoring

Annual Audit of the Policy: the CPO will assess annually (by March 31st of each year) the implementation of the Policy through self-assessment questionnaires (Annex 4) and will prepare a report to submit to the CEO and the Board of Directors.

The Policy is updated by the CPO at least once every 3 years. The changes are submitted for approval to the CEO and the Board of Directors.

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Annex 1. Terms and definitions

Understanding children and knowing the forms of violence tied to them is the starting point for the creation of a safe environment.

VIOLENCE means any non-accidental behaviour carried out by parents, guardians, other adults or other children, which results in potential or actual harm of the health, development or dignity of a child or adolescent. Such behaviours can be intentional or unintentional and include both acts of omission (e.g. negligence) and commission (e.g. abuse).

Within this broad definition, five main categories of mistreatment can be identified: physical abuse, sexual abuse, psychological abuse, neglect and negligent treatment, and exploitation. Although there is broad consensus about the existence of such categories of mistreatment, there is no unanimity of opinion on their definitions.

CIAI uses the definitions accepted by most of the International Agencies, by the United Nations and by other organisations working with child protection.

1. Child abuse

Any act deliberately carried out by a parent or a person in a position of power and authority, which can harm or is likely to cause harm to the safety, well-being, dignity and development of a child. Child abuse includes all forms of physical and psychological discrimination, abuse of power and the betrayal of trust of with respect to the child.

- ✓ *Peer-on-peer abuse* - Peer abuse occurs when a child is exploited, bullied and/or is harmed by their peers or other children within the same age range. It can manifest in different forms: sexual harassment, *sexting*, the use of hate speech, bullying, *body shaming*, etc. (see Annex 6: Management of peer-on-peer abuse)

Activity. What do you think of the famous phrase "never take sweets from a stranger"?

- a. in the vast majority of cases the person who commits abuse is not an unknown individual, but a person the child knows well.
- b. in the vast majority of cases the person who commits abuse is an unfamiliar person.

Unfortunately, statistics demonstrate in most cases the people closest to us are the ones abusing children.

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Physical abuse

Physical abuse refers to any action that causes actual or possible physical harm to the child. It can occur from adult to child, and from child to child. Physical mistreatment can be distinguished from the other form of abuse by the presence of the following elements:

- **Unpredictability.** The child does not know what can trigger the anger and aggression of the aggressor. There are no clear boundaries or rules. The child is constantly walking on eggshells, never sure what behaviour will trigger a physical assault.
- **Anger lash outs.** The physical abuser acts out of anger and desire to exert control over the child. The more intense the anger, the more intense the abuse.
- **Using fear to control behaviour.** The abusers may believe that children need to fear them in order to behave, and thus opt for physical abuse to gain respect and achieve obedience. However, in this way the child does not learn to behave appropriately and to grow up rather to avoid being hit

Psychological abuse

Psychological abuse is behaviour repeated and persistent over time which harms the affective, cognitive and relational development of the child and the perception of themselves. Can take different forms and often coexists with other types of abuse. In this form of abuse, physical injury does not normally occur and hence, it may be difficult to demonstrate its occurrence and may sometimes require the intervention of the authorities.

Examples of psychological child abuse include:

- constant belittling, shaming, and humiliating a child
- calling names and ridiculing in order to belittle his personality, physical appearance and abilities
- making him feel inadequate and unloved
- frequent yelling, threatening, or bullying
- exposing the child to violence or the abuse of others, whether it be the abuse of a parent, a sibling, or even a pet

Additional forms of abuse are:

- ✓ *Body shaming or derision of the body:* the act of mocking/discriminating against the physical appearance of a person.
- ✓ *Bullying (and cyberbullying):* a form of violent and intentional behaviour, of physical and psychological nature, repeated over time and implemented towards people perceived as more frail.

For further information on peer-to-peer activities, please refer to Annex 6: Managing peer-on-peer abuse

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2. Sexual abuse

Sexual abuse is described as interactions, with or without physical contact, between an adult, peer or another young person, where the child is being used as an object of sexual gratification for the abuser. Sexual abuse means the involvement of a child in sexual activities as objects of gratification. It can occur with or without physical contact, by an adult or a peer. Some examples of sexual abuse: fondling of the child's genitals; masturbation; oral sex; vaginal or anal penetration; exposure of the child to pornography, etc. Abuse can occur through force, threats, bribes, trickery or pressure.

- ✓ *Sexting* - neologism used to indicate the act of sending sexually explicit messages, texts and/or images, mainly via mobile phone or via the internet. *Sexting* can have serious consequences linked to diffusion of the content on the web and social media (revenge porn, sextortion and cyberbullying), emotional and developmental consequences and also legal consequences (crimes related to child pornography).

3. Neglect

Neglect is the failure of parents or caregivers to meet a child's physical and emotional needs when they have the means, the knowledge, and the access to services to do so; the failure to protect her or him from exposure to danger; failure to provide for the development in the areas of health, education, emotional development, nutrition, shelter or safe living conditions can amount to neglect. Neglect occurs when caregivers deny children their basic needs such as medical supervision, education and emotional growth often to the point where children are exposed to physical and psychological harm.

- ✓ Pathology of care, in other words, the conditions in which parents or persons legally responsible for the child do not adequately provide for their physical and mental needs, in relation to their age and developmental stage.
 - **Negligence:** occurs when there is lack of care
 - **Care inappropriate at time:** occurs when care is provided in a distorted way, not appropriate in relation to the developmental stage and needs of the child
 - **Overcare:** occurs when care is administered in excess.

4. Harm

Harm is the consequence of exploitation, violence, abuse and neglect of children. It can undertake many forms, including impacts on children's psycho-physical, emotional and behavioural development, their general health, their family and social relationships, their self-esteem, their educational attainment and their aspirations.

Children's Rights to Protection from Abuse, Neglect, Exploitation and Violence.

Key child articles of the UN Convention on the Rights of the Child in relation to child protection are: Article 9 (family separation), 10 (family reunification across borders), 11 (illicit transfer of children), 16 (right to privacy, honour and reputation), 19 (protection from violence, injury, abuse, neglect, mistreatment or exploitation), 20 (alternative care), 21 (adoption), 22 (refugee children), 23 (disabled children), 24 (right to health, care and assistance), 25 (periodic review of alternative care), 32 (economic exploitation), 34 (sexual abuse and exploitation), 35 (abduction, sale or trafficking of children), 37 (juvenile justice and protection from inhuman or degrading torture and denial of freedom), 38 (protection in armed conflict), 39 (social recovery and reintegration) and 40 (children in conflict with the law).

Articles not directly related to protection, but which constitute essential complements to guarantee the protection of the rights of children include: Article 2 (non-discrimination), 3 (the best interest of the child), 4 (accountability), 5 (development of abilities of the child and support for the parent, extended family and community), 6 (survival and development), 7 (birth registration – name and nationality), 8 (protection of identity), 18 (parental responsibility), 26 (social security), 27 (adequate standard of living and social protection), 28 & 29 (education), and 31 (play and leisure).

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Annex 2: Child Safeguarding and Protection Officer (CPO) and Focal Point (FP)

Both figures are appointed by the CIAI Management.

Responsibilities to be included in the job description (JD) of assigned personnel:

A. Child Safeguarding and Protection Officer (Responsible for the safeguarding and protection of children - CPO)

The CPO will support the Focal Point taking on the following responsibilities:

- monitors the implementation of the CSPP
- ensures the training and updating of the staff
- ensures that all reported events are recorded correctly
- takes the lead role in raising awareness and providing support to the Policy addressees
- guarantees the follow up of reported cases
- manages the email inbox for reports
- prepare the annual audit/report

B. Focal Point (or the office, program, project and/or activity contact person)

- monitors the implementation of preventive measures for the office, program, project and/or activity
- carries out the risk analysis and prepares the Guide to proper ethical and appropriate behaviour in relationships between adults and children (Project Code of Conduct)
- prepares appropriate tools to facilitate reporting
- ensures that all incidents are correctly recorded and reported to the CPO
- takes a leading role in raising awareness and providing support to the children and adolescents, to the community and to the partners
- executes the annual audit

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Annex 3: DECLARATION OF COMMITMENT AND SELF-DECLARATION OF ABSENCE OF PENALTIES

CIAI Child Protection Policy

DECLARATION OF COMMITMENT

I, *Name and Surname*, declare that I have read and understood the CIAI Child safeguarding and Protection Policy, with the general aim to promote and guarantee the rights of children to protection from all forms of mistreatment, neglect, exploitation and violence. The Policy defines the procedures which CIAI abides to, to increase its ability to manage and reduce the risks of mistreatment or abuse when carrying out activities of the organisation.

I agree with the principles contained therein, I accept the importance of implementing the Policy and practices of child protection while working with CIAI.

Full name:

Identity card number:

Qualification / title:

Signature and date

SELF-DECLARATION OF ABSENCE OF CRIMINAL CONVICTIONS

I, *Name and Surname*, declare that I have never been indicted for any crime relating to crime against children (Legislative Decree no. 39/2014 implementing Directive 2011/93/EU relating to the fight against sexual abuse and exploitation of children and child pornography).

Full name:

Identity card number:

Qualification / title:

Signature and date

Annex 4: Annual Audit of the CSPP

LOCATION/PROGECT: _____

Focal Point: _____

Date: 31/12/202__

Answer all questions	YES / NO / PARTIAL n/a	If NO or PARTIAL, briefly explain
Responsibility		
1. Have all the Policy addressees signed the Declaration?		
2. Have all the new Policy addressees received training?		
3. Have all the Policy addressees been updated?		
4. Have the children been informed?		
5. Have the families and the members of the community been informed?		
6. Have all the parties been informed and signed the Policy?		
Prevention		
7. HUMAN RESOURCES – Have the preventive measures for the selection and recruitment of new human resources been applied?		
8. SELECTION OF PARTNERS - Have the preventive measures for the selection of partners been applied?		
9. PROJECTS AND ACTIVITIES – Are Focal Points currently appointed?		
10. PROJECTS AND ACTIVITIES – Has risk analysis been carried out?		
11. PROJECTS AND ACTIVITIES – Has the Project Code of Conduct been laid out and shared with the Policy addressees and recipients of the project activities?		
12. A CHILD-FRIENDLY ENVIRONMENT – Have the necessary measures for a child-friendly environment been applied?		

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Reporting		
13. During the year n. ___ cases have been reported?		Number=
14. Have the CASE MANAGEMENT procedures always respected the two key values: confidentiality and fairness?		
15. Have the children reported cases directly? (YES, if at least 1 case)		
16. Have the expected timeframe and modality for reporting been respected?		
17. Has action been taken to support and follow up on all the reported cases?		

Notes:

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Annex 5: Incident report form

Please fill in this form if you believe an incident in violation of the CSPP Policy or CIAI Code of Conduct may have occurred.

Safeguarding concerns must be reported immediately or within 24 hours.

The report must be treated with the highest degree of confidentiality.

Name of the alleged victim:		Date and time (of the case report):	
Date of birth / age:		Sex:	
Place of residence:		Need for immediate support?	

Name and position of the person filling in the form			
Name of the person filing the report (if not the same as the victim)			
Internal case (the infringement concerns the Policy addressees: staff, volunteers, partners, etc.) <input type="checkbox"/>	External case (the subject of the complaint is a member of the community) <input type="checkbox"/>		

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1. Time and date of the incident:
2. Describe the concerns, suspicion and/or events of the incident:
 - What are you worried about?
 - Of whom?
 - For what? (in the case of a verbal record by a child, state in your own words)
 - Where?
3. Any witnesses or people who have been informed:
4. Has the person been wounded or suffered physical or psychological harm? Report any other relevant information:
5. Is the person at risk of imminent danger? How come?
6. Has the case been reported to the competent authorities? If not, why? Is there intent to do so?
7. Have parents and/or guardians been informed? In both cases indicate the reasons:
8. Actions taken (return to home, in hospital, etc.) and related reasons:
9. Further measures to be taken:

Annotate all times, dates, names, individuals with whom the information was shared with and when, etc.

Signature of the person who handled the report.

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Annex 6: Management of peer-on-peer abuse

Preamble – The online peer-to-peer tutoring activities, between minors, part of the TOP program, have surfaced new risks that need to be further explored and which have led the CIAI to draft this annex.

Responsibility

When applying the Lines of Conduct for Child Safeguarding and Protection, CIAI also commits to preventing, identifying early and adequately managing peer-on-peer violence and abuse. Peer-on-peer is defined as any form of physical, sexual, emotional or coercive control abuse exercised among children both online and offline.

Zero tolerance – CIAI recognizes that abuse is abuse and should never be diminished or downplayed. For example, disregarding peer-to-peer sexual harassment or emotional bullying as “*just jokes*”, “*it's just for laughs*”, “*it's part of growing up*” or “*boys will be boys*” can lead to a culture which normalizes abuse and creates unsafe environments². The Policy addressees must always be minded, non-judgmental, respectful and responsible in dealing with such sensitive issues such as peer-on-peer abuse. These can have long-lasting and traumatic consequences for minors.

Awareness

Ensure that all Policy addressees and all people involved (community, children) are aware and conscious of the problem of abuse and its consequences (see Annex 1 – Child abuse).

Peer-on-peer abuse means abuse which happens between peers or children no more than 7-8 years of age-difference. Peer-on-peer violence and abuse can take various forms, including (but not limited to): severe bullying (including cyberbullying), relationship abuse, domestic violence and abuse, sexual exploitation of minors, youth violence, economic exploitation, illicit sexual behaviour and/or violence based on prejudice including, but not limited to, gender violence³.

Online peer-on-peer abuse is any form of abuse that involves the use of a digital component, for example *sexting*, coercion and exploitation, grooming, dissemination of threatening language, sexual content and harassment.

² <https://safeguarding.network/content/safeguarding-resources/peer-peer-abuse/>

³ Peer-on-Peer Abuse Toolkit; it will be renamed Addressing Child-On-Child Abuse. Farrer & Co. 2022.

https://www.farrer.co.uk/globalassets/brochures/safe_safeguarding-toolkit-2019-as-at-june-2022.pdf

Peer abuse can be motivated by perceived differences, for example, race, religion, gender, sexual orientation, disability or other differences. Peer abuse can lead to isolation, intimidation, violence or post-traumatic stress. It can cause lasting damage and trauma in the victim. It should not be forgotten that peer abuse is also harmful to the perpetrator (who is also a child).

Any young person can be affected by peer abuse, but some individuals are more vulnerable than others:

- peer abuse is experienced mainly by children aged 10 and over, and those who suffer abuse are generally slightly younger than those by whom they get abused;
- girls are more frequently victims of abuse by their peers;
- young people living with domestic abuse are more vulnerable to peer abuse. Many kids who exhibit harmful behaviour towards others are themselves vulnerable and might have been (or still are) victimised by peers, parents, or adults in the community before exerting peer abuse.

Prevention

In the case of projects which see the involvement of child and adolescent CIAI volunteers (Policy addressees who are minors), each must produce a **Guide to ethical and appropriate behaviour** which takes into account the specificity of the relationship between peers (or between children and adolescents when the age difference is more than 7-8 years) that responds to identified risks and needs.

All volunteers who are minors and who want to carry out peer-to-peer activities, for example one-to-one online tutoring, must provide parental consent and the presence of a teacher/educator (acting as points of reference). During the selection process the information provided will be used to deepen and determine the eligibility of volunteers to carry out activities with children younger than themselves.

Furthermore, as required by the Policy, in each project:

- a risk analysis must be conducted using a participatory approach which evaluates the potential impact on the children and adolescents involved and identifies appropriate strategies to reduce them to a minimum. Peer activities are considered, for example, online and offline peer-to-peer tutoring, peer education, role modelling activities among students, etc.
- the Policy principles and the Guidelines will be shared with all the child recipients of activities, with the families, guardians and with the community in a way that is understandable to them.

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Reporting

It is important to keep in mind that it is difficult to identify peer-on-peer abuse early and that it may happen at any time: even when no reports emerge, it does not mean that abuse is not taking place. For example, in the case of bullying "up to 50% of victims do not talk about it with their parents and up to 60% never talk about it, or rarely do so with teachers for fear of possible repercussions or for shame" (Istat survey 2019).

Conducting investigations on possible abuse is not the responsibility of the person making the report. However, it may be of importance to specify the following details (if already available), in addition to what is provided in Annex 5 - Account report:

- What is the age of the children involved?
- Where did the accident or accidents occur?
- What was the explanation of all the children involved in what happened?
- What is the understanding of each child of what happened?
- Was the behaviour repeated on more than one occasion

Response

In addition to what is already stated in the Policy, the Committee for Report Management and the Internal Committee will consider all children and adolescents involved as potentially at risk. All this to ensure that there is a protective response for both the child who has allegedly suffered the abuse, as well as for the child suspected responsible for the act.

Useful resources:

- Peer-on-peer abuse toolkit https://www.farrer.co.uk/globalassets/brochures/safe_safeguarding-toolkit-2019-as-at-june-2022.pdf
- Peer-on-peer abuse <https://safeguarding.network/content/safeguarding-resources/peer-peer-abuse/>
- Example of a Peer-on-Peer Abuse Policy (Balears International College) https://cdn2.assets-servd.host/empty-vicuna/production/documents/Peer-on-Peer-Abuse-policy-2021_2021-10-13-075303_dwfe.pdf
- UK - Keeping children safe in education. Statutory guidance for schools and colleges on safeguarding children and safer recruitment. <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

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