

Università degli Studi
"LINK CAMPUS UNIVERSITY"

Child Protection Policy

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1. INTRODUCTION AND DEFINITIONS:

1.1. Policy Statement

Università degli Studi "Link Campus University" (LCU) is committed to develop and practice an effective and holistic Child Protection Policy in order to prevent, support and protect children from any risk of violence and abuse. Staff and all the professor and advisors within the university accept and recognize our responsibilities to develop awareness of the issues which cause children harm. LCU is also committed to review the current Child Protection Policy and Procedures at a regular basis.

1.2. Basic Definitions

Child: LCU uses the definition of the United Nations Convention for the Rights of the Child, by which any person under 18 years of age is a child, even if a country's laws recognize an earlier coming of age.

Child protection: The term is used to describe the responsibilities and actions undertaken by LCU targeted to preventing and dealing with child abuse and/or neglect, and exposing a minor to danger.

Staff/ Personnel: The term refers to all personnel working and collaborating at LCU.

Partners: The term refers to all partners, members of the Board of Directors, professors, researchers and advisors working with LCU.

Child abuse: According to the World Health Organization, child abuse or maltreatment "includes all types of physical and/or emotional maltreatment, sexual abuse, neglect or negligence and commercial or other exploitation which results in actual or potential harm to a child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power".

Working with children: The term refers to an employment position that includes frequent contact with children, either as part of the employee's responsibilities, or because of the job description that brings the employee in frequent contact with children.

1.3. Definitions of Abuse ¹

Child abuse constitutes 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.

Harm cannot always be easily categorized as children can be abused in a number of ways, but some broad definitions of abuse can be identified:

1. Physical abuse: may involve hitting, shaking, throwing, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child who they are looking after.
2. Emotional abuse: is defined as the persistent emotional ill treatment of a child such as to cause severe and persistent effects on the child's emotional development. It may involve conveying to children that they are worthless and unloved, inadequate, or valued only so far as they meet the needs of another person. It may involve age or developmentally inappropriate expectations being imposed in children. It may involve causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of ill treatment of a child, though it may occur alone.
3. Sexual abuse: involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g., rape) or non-penetrative acts. They may include non contact activities, such as involving children in looking at, or in the production of, pornographic materials or watching sexual activities, or encouraging children to behave in sexually inappropriate ways
4. Neglect: is defined as the persistent failure to meet the child's basic physical and/ or psychological needs, likely to result in the serious impairment of the child's physical or cognitive development.
5. Bullying: may be defined as deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves. It can take many forms, but the three main types are physical (e.g. hitting, kicking, theft), verbal (e.g. racist or homophobic remarks, threats, name calling) and emotional (e.g. isolating an individual from the activities and social acceptance of their peer group).
6. Commercial sexual exploitation of children: comprises sexual abuse by the adult and remuneration in cash or kind to the child or a third person or persons. The child is

¹ Based on: "WHO definition, Report of the Consultation on Child Abuse Prevention WHO – 1999", "Child protection fact sheet, The definitions and signs of child abuse, NSPCC, 2009", "The UN Secretary General's Study on Violence, 2005"

treated as sexual object and as a commercial object. The commercial sexual exploitation of children constitutes a form of coercion and violence against children, and amounts to forced labour and a contemporary form of slavery.

7. Commercial exploitation: means exploiting a child in work or other activities for the benefit of others and to the detriment of the child's physical or mental health, education, moral or social- emotional development. It includes, but is not limited to, child labour.
8. Child pornography: means any representation, by whatever means, of a child engaged in real or simulated explicit sexual activities or any representation of the sexual parts of a child for primarily sexual purposes. This can include photographs, negatives, slides, magazines, books, drawings, movies, videotapes and computer disks or files. There are two categories of pornography: softcore which is not sexually explicit but involves naked and seductive images of children and hard core which relates to images of children engaged in sexual activity and use of children in the production of pornography is sexual exploitation.

1.4. Legislation and current child protection principles

LCU Child Protection Policy is based on the Convention of the Rights of the Child and on Italian legislation on child abuse.

LCU Child Protection Policy deals with the protection of children as defined by the UN Convention on the Rights of the Child. The UN CRC should be taken holistically, providing a comprehensive framework for the protection, provision and participation of all children. The European Commission is guided by the principles set out in the UN Convention on the rights of the child, ratified by all EU countries. Article 3(3) of the Treaty on European Union establishes the objective for the EU to promote protection of the rights of the child. The Charter of Fundamental Rights of the EU guarantees the protection of the rights of the child by the EU institutions and by EU countries when they implement EU law. Article 24 on the rights of the child and Article 31 on the prohibition of child labour specifically cover children's rights.

All children involved in LCU activities, projects and programmes have the right to have their health, safety and well - being, and their best interests considered as top priority.

To this end, the following guiding principles are considered:

- Every child is recognised, respected and protected by the organisation as a rights holder, with non-negotiable rights to protection.
- Every child is treated with dignity and as a unique and valuable human being with an individual personality, distinct needs, interests, and privacy, with due regard to the child's right to participation.
- All children, regardless of their sex, race, colour, ethnic or social origin, genetic

features, language, religion or belief, political or any other opinion, membership of a national minority, property, birth, disability, age or sexual orientation or gender identity have access to and benefit services provided on an equal basis.

- LCU recognises the role of families as primary caregiver.
- Professionals, practitioners, and volunteers working for and with children receive training and guidance on the rights of the child, on child protection law and procedures, on identification of risks and more generally on child development. They are screened appropriately in line with practices available at national level. The necessary protocols and processes are in place to facilitate the role of staff working in the organisation and responses to violence against children are inter- or multi- disciplinary.
- Standards, indicators, tools and systems of monitoring and evaluation are in place, as well as reporting mechanisms.

1.5. Who to contact

LCU has designated a senior member of staff to take specific responsibility for child protection matters within LCU.

LCU child protection policy applies to:

- All staff; Management Board members; Professors and Advisors of LCU;
- All those acting on behalf of LCU such as members, consultants or professors;
- All those adults accompanying children to events and activities organized by LCU;
- All those who participate in LCU events and meetings involving children, including journalists, sponsors, professors, researchers, policy makers, etc.

All cases of alleged or suspected abuse should be immediately reported to your designated Child Protection Representative or to the Director in their absence.

The appropriate external contacts are:

- The respective Local Police Stations
- The respective Local Social Services Offices

1.6. Who does this affect

These documents are designed for the guidance of all staff members, professors, teaching staff, partners and associates of LCU, as well as all children and their families and carers who working at LCU. The policy and procedures will be made available to all of the above mentioned individuals/groups.

A child is defined as any individual under the age of 18 years. The policy and procedures may also be relevant for use in the case of any vulnerable young person over the age of 18

years who is utilizing the services of LCU.

LCU's Child Protection policy and procedures apply to all children and young people regardless of their sex, race, colour, ethnic or social origin, genetic features, language, religion or belief, political or any other opinion, membership of a national minority, property, birth, disability, age or sexual orientation or gender identity.

2. RECOGNISING AND RESPONDING TO ABUSE

2.1. Awareness of Abuse

Awareness is the key issue in both the detection and prevention of abuse. A staff member, volunteer, parent or carer may become aware or suspicious of abuse of a child by:

- i) being told in confidence by the individual child
- ii) being told by another person as hearsay or as a witness
- iii) observing symptomatic behavior
- iv) observing outward signs of physical abuse/injury
- v) The abuse may:
 - took place a long time ago – even in early childhood and the child may still be suffering the consequences
 - be an on-going form of abuse which takes place outside LCU, for example typically at home
 - be a current or very recent abuse that has taken place within LCU

2.2. How to recognize signs of Abuse

Possible indicators may include:

- **Physical Abuse:** Any visible injuries particularly not normal child-like bumps and scrapes. Children who find it painful to walk, sit down, to move their jaws or demonstrate other pain. Being furtive or secretive, or displaying uncharacteristic aggression or withdrawn behavior. Compulsive eating or sudden loss of appetite. Having difficulty in staying awake or suddenly becoming un-coordinated Giving confused or conflicting explanations of injuries
- **Emotional Abuse:** Poor attachment relationship between the child and parent/carer. Parent/carer displaying unresponsive or neglectful behavior towards the child or making negative comments about the child. The child may be demonstrating emotional indicators such as low self esteem, unhappiness, fear, distress or anxiety and demonstrating behavioral indicators such as attention seeking, opposing, withdrawing or insecurity.
- **Sexual Abuse indications:** Awkwardness in walking or sitting down, tummy pains, tiredness, extreme variations in behavior; such as anxiety, aggression or withdrawal, sexually provocative behavior or knowledge that is incompatible with the child's age and

understanding, drawings and/or written work which are sexually explicit, direct disclosure – it is important to recognize that children have neither the experience nor the understanding to be able to make up stories about sexual assault.

- **Neglect indications:** Underweight or obese, unkempt dirty appearance; inadequate/unwashed clothes, hunger, listlessness, indiscriminate friendliness or poor social relationships, poor concentration, low self esteem.

2.3. Responding to Suspected Abuse

No member of teaching staff and employees, professors, tutors or carer should investigate reports of physical or sexual abuse him/herself. Alleged victims, perpetrators, those reporting abuse and others involved should not be interviewed beyond the point at which it is clear that there is an allegation. Medical attention should be sought immediately for the child if required.

Any individual to whom an allegation of child abuse is made should then:

Step 1: Limit any questioning to the minimum necessary to seek clarification only, strictly avoiding “leading” the child by making suggestions or asking questions that introduce their own ideas about what may have happened.

Step 2: After the child disclosed that something abusive has happened to him/her or someone else, collect only necessary information (Appendix 1) in order to ensure that there is a reasonable doubt and to be able to report to Child Protection Representative. Stop asking any more questions as soon as the child has disclosed that he/she believes that something abusive has happened to him/her or to someone else.

Step 3: Tell the child that the relevant designated Child Protection Representative or Authority will now be made aware of the issue.

Step 4: Depending on the age of the child, ask the child what steps he/she would like taken to protect him/her now that an allegation has been made and assure him/her that LCU will try to follow those wishes.

Step 5: Report the information immediately to the designated Child Protection Representative for that area (or to HR or Director at Head Office). If the allegation or suspicion is about the designated person, the report should be made to Head Office. If the volunteer or member of staff would prefer to speak to someone other than designated persons within LCU, he/she should contact Social Services directly.

Step 6: Complete a Record of Concern form and pass this to the designated Child Protection Representative, or relevant Authority if required. Records of Concern must be stored confidentially, in a secure place accessed only by a designated Child Protection Representative.

Step 7: If the report has been made to a staff member or volunteer, inform the child's parents/carers unless there is a suspicion of their involvement.

Additionally, any staff member, volunteer, parent or carer who is told indirectly of any incident or witnesses or suspects any form of child abuse must report the information immediately, as detailed in Step 5.

2.4. Do's and Don'ts

Treat any allegation seriously. Make no promises you can't keep. Display belief in what the child is telling you. Interrogate the child; make questions and try to make him/her talk to you - open up to you. Tell the child he/she is right to tell you. Reassure that he/she is not to blame. Be honest about who you have to tell and why. Write down everything said and what was done. Seek medical attention immediately if necessary. Inform parents/carers unless there is suspicion of their involvement

Don't cast doubt on what the child tells you. Don't interrupt or change the subject. Don't say anything that makes the child feel responsible for the abuse.

2.5. Confidentiality and Personal Data Protection

Staff members, professors, parents or carers and advisors should never give absolute guarantees of confidentiality to children or other colleagues wishing to tell them something serious. They are obligated to clearly define situations in which they need to breach confidentiality. They should, however, guarantee that they will only pass on information to the minimum number of people who must be told to ensure proper action is taken. They should guarantee that they will not tell anyone who does not have a clear "need to know" and that confidentiality will be respected within the designated team. If any staff member, volunteer, parent or carer has any suspicion, allegation or disclosure that a child is suffering or is likely to suffer significant harm, then this must always be referred to the relevant Child Protection Representative or Social Services.

Personal data of children will be collected, processed and protected in a lawful and fair manner, in accordance with the EU General Data Protection Regulation 2016/679 (GDPR), as regulated in the Privacy Policy to be delivered and signed by the child's parent or guardian.

3. CODE OF ETHICS AND CONDUCT

3.1. Basic principles

The basic principles and ethics that govern LCU are listed below:

- Every action needs to be in the best interest of the child;
- Continuous promotion and protection of children's best interest;
- Zero tolerance for child abuse – mandatory reporting of child abuse incidents or suspicions of child abuse;
- Children's protection constitutes a common responsibility within the LCU, its partners and the communities in which LCU operates;
- Every action needs to be aimed at protection of children, ensuring its development;
- In every situation that includes direct work with children it is crucial to respect its differences such as culture, religion etc.
- Children's opinions and aspects are noted and carefully considered in order to maintain the policy of children protection up to date and to develop relevant programs and actions.
- Every child need to be heard and his opinion needs to be taken when deciding about his life or wellbeing.

3.2. Code of Ethics

The Code of ethics that govern LCU are listed below:

- Staff/ Personnel are obliged to respect the individual personalities of the children that are supported and protected by LCU and to ensure their best interest.
- Staff/ Personnel are obliged not to violate the rights of children under the protection or the supervision of LCU
- Staff/ Personnel are obliged when practicing their professional activities to preserve the children's privacy and of matters that concern them.
- Staff/ Personnel are obliged to deal with children as equals and with respect regardless of their race, skin color, sex, language, religion, origin, beliefs, legal status of their own or their family members, and respect their national, religious, cultural and social background.
- Staff/ Personnel are obliged to respect the human dignity of every child, their physical integrity and the right of the child not to be treated in a demeaning manner and not to be violently raised. Any and every kind/form of violence towards the children is strictly prohibited.
- Staff/ Personnel are obliged to inform immediately the relevant/appropriate people in charge regarding incidents of children being mistreated when it comes to their attention.
- Staff/ Personnel are obliged to contribute to the proper preparation of children for their role in society as active and responsible adults through games, sports,

- participation in teams, assignment of responsibilities, etc.
- Staff/ Personnel are obliged to provide and ensure high quality medical care, equal opportunities, access to all kinds of education and carer guidance for the children.
 - Staff/ Personnel are obliged to take into consideration, according to the age and maturity of the children, their right to participate in the decision making regarding their life and their living conditions.
 - Staff/ Personnel are obliged to respect the children's private life and their freedom of expression, on the condition that the other children's rights are not violated.
 - Staff/ Personnel are obliged to encourage children to speak up for matters that concern them.
 - Staff/ Personnel are obliged to provide, as much as possible, support and positive reinforcement measures in order to strengthen the relations and the functionality between each child and their family.

The violation of any of the above obligations constitutes a disciplinary offense and is presented to the BoD for evaluation, while the BoD is empowered to take measures of reprimand (oral or written), call for compliance and/or terminate the *employment contract without indemnification from the Organization*.

3.3. Appropriate Conduct and behaviour

Staff members, professors, parents and advisors should:

Be aware of a visually impaired child's need for physical contact, but ensure that contact is appropriate and given only with the consent of the child or young person – in the case of restraining a child to prevent injury or comforting a distressed child, ensure physical contact is ceased at the earliest possible moment. Avoid initiating physical expressions of emotion such as kissing or hugging, but remember that a visually impaired child or young person may need to physically express emotion in these ways – if a child initiates such expressions, cease it at the earliest possible moment without causing the child to feel rejected. Avoid intrusive forms of play (i.e. tickling, horseplay) – if physical contact is offered from a child, cease it at the earliest possible moment without causing the child to feel rejected.

Not allow children and young people to use inappropriate language unchallenged. Ensure that at least two adults are present when supervising children or young people. Not spend excessive amounts of time alone with children, away from others – meetings with individual children or young people should take place as openly as possible. If privacy is required, the door should be left open and other staff or volunteers informed of the meeting. Avoid taking individual children on car journeys, however short – where this is unavoidable, it should be with the full knowledge and consent of parents/carers and a member of management. Not meet with children outside organized activities, unless it is with the knowledge and consent

of parents and a member of management. Never do things of a personal nature for a child or young person that they can do themselves. Never let allegations a child or young person makes go without being addressed and recorded.

The following forms of behavior between staff members or volunteers and children or young people are not allowed under any circumstances: sexual conduct, lending or borrowing of money or property, giving or receiving gifts, exclusive or secretive relationships.

3.4. Following the procedures for safeguarding children on trips

Trips involving children and young people will normally also include parents and carers. However, it is important that the following procedures are adhered to in order to keep children and young people safe:

Ensure children and young people are aware of how they are expected to behave Gain written consent from parents/carers for children to participate in an outing, as well as a written statement of any specific needs or requirements for their child Ensure at least one staff member or volunteer participating in the outing is trained in first aid and has access to first aid equipment Ensure all those attending are aware of their roles and responsibilities and are appropriately qualified and experienced

If using an activity centre or other external provider:

Use reputable organizations which have in place any licenses or accreditation required (some adventure activities require specific licenses). Visit the centre beforehand wherever possible. Gain agreement from parents/carers and the children and young people on the trip on the activities to be undertaken. Ensure external providers have proper safety procedures in place (e.g. insurance, equipment/transport maintenance, health and safety policy, Child Protection Policy etc) Ensure the accommodation is suitable.

All planned activities and trips must be appropriate for the group of children and/or young people participating.

3.5. Sharing information about child protection and good practice with children, parents and staff members

It is essential that children and young people understand that any concerns they may have will be listened to and taken seriously. It is also essential that parents and carers are aware of and understand the procedures LCU has in place for maintaining the welfare of children and young people using its services.

LCU management is responsible for ensuring that relevant information is available to and exchanged between all those involved in the operation of LCU and its activities. Confidential

information should only be shared on a need to know basis.

Management and staff are responsible for:

Ensuring children and young people have information about how and with whom they can share their concerns, complaints and anxieties. This information must be shared in a manner appropriate to the age of the child/young person. Ensuring all information is available in multiple formats for the blind and visually impaired. Ensuring parents and carers are aware of the nature of relationships with adults with whom their children form friendships. Publicizing information to parents and careers about LCU's activities, its Child Protection Policy and Procedures, and the name of the person(s) to contact in the event of concerns or complaints. Ensuring all staff and volunteers have the information required to deal with emergencies and child protection issues.

3.6. Following carefully the procedures for recruitment and selection of staff

When a vacancy is identified, a job description or task/project brief must be drawn up which should identify the skills required for that post. The vacancy should be advertised as widely as possible through the most appropriate means.

All the staff, including temporary or casual workers, must be subject to LCU's selection and recruitment procedures as follows:

All candidates must complete an application form. The recruiting manager should verify the person's identity by his/her birth certificate, passport or other formal document, preferably something bearing their photograph. The recruiting manager should verify any qualifications stated on the application form. All suitable candidates must have an interview or meeting, with the recruiting manager and one other senior staff member. Any gaps in employment or inconsistencies in the candidate's history must be identified and reasons given. All candidates must declare that they have no pending criminal proceedings or convictions for crimes committed against children. Advice should be sought prior to recruiting someone with a criminal record or record of other offences. New members of staff must undergo a supervised probationary period including a comprehensive induction which must cover the Child Protection Policy and Procedures.

In order to ensure the implementation of Child Protection Policy every employee will be informed about the CPP or other procedures concerning direct work with children.

Every employee is obligated to cooperate with law enforcement and social welfare institution in order to ensure well being of the child.

3.7. Providing effective management for staff and volunteers through supervision, support and training

LCU will ensure that all employed and non-employed personnel are well informed and supported, by the following process:

Induction

As part of their general induction, new staff will be familiarized with this Policy and Procedures document, as well as other policies such as Health and Safety. This may include training in child protection issues.

Probationary Period

The development and suitability of the employee or volunteer will be reviewed during the first six months of taking up the post.

Supervision and Support

Regular meetings, whether individual or on a group basis, will provide an opportunity for staff/volunteers to share concerns, anxieties or worries about their work or the environment. Meetings should also be an opportunity to identify areas of concern and/or training needs. Specific training will be provided for all Designated Child Protection Representatives.

APPENDIX 1: RECORD OF CONCERN

Name of Child:

Age:

Child's Address:

Name of Parent/Carer:

Telephone no:

Is the person making this report expressing his/her own concerns or passing on those of someone else?

What is said to have happened or what was seen?

When and where did it occur?

Has the child been spoken to? If so, what was said?

Who else, if anyone, was involved and how?

What was said by those involved?

Were there any obvious signs, e.g. bruising, bleeding, changed behavior ?

Has anybody been alleged to be the abuser?

Have the child's parents been contacted?

Who else has been told about it and when?

Signed..... Date.....

NAME.....

APPENDIX 2: GUIDELINES FOR CHILD PROTECTION REPRESENTATIVES

The responsibilities of a designated Child Protection Representative are:

1. To ensure that LCU's Child Protection Policy and Procedures are followed
2. To undertake training in the recognition and investigation of child abuse
3. To develop knowledge of the procedures involved in reporting abuse
4. To make this knowledge available to all staff, volunteers, parents, carers and children as appropriate
5. To manage the process of referring cases or suspected cases of abuse to Social Services by:
 - i. Ensuring all staff, volunteers, parents, carers and children know who is the designated Child Protection (CP) Representative
 - ii. Ensuring that all staff, volunteers, parents, carers and children know that concerns about abuse or possible abuse must be brought to the designated CP Representative or in his/her absence, the most senior member of staff
 - iii. Deciding, after discussion with the relevant parties, if the case should be referred or not, or if further clarification should be sought from the parents/carers at any point
 - iv. Ensuring decisions and facts are recorded using a Record of Concern
 - v. Reporting the case to Social Services, confirming the referral in writing under confidential cover
6. To ensure all staff and volunteers undergo basic Child Protection awareness training as appropriate
7. To be a contact point for external agencies needing to contact LCU about child protection matters
8. To ensure written records are stored securely with access available to designated people only
9. To ensure LCU recruitment procedures are followed and a "statement of a clean criminal record" is obtained for all new staff
10. Identify the need for support that any employee or volunteer may have when involved in an abuse case and to liaise with necessary parties to establish how this support can be offered.