



Internal policy

**CHILD
PROTECTION
POLICY**

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Child Protection Policy

1. Introduction and Purpose

Centro Studi e Ricerca Impacto ETS ("Impacto") recognises that the protection and promotion of children's rights is both **a moral duty and a legal obligation**.

All children — defined, in line with Article 1 of the **United Nations Convention on the Rights of the Child (UNCRC, 1989)**, as persons under the age of 18 — have the right to grow up in a safe environment, free from violence, abuse, neglect, and exploitation. This Child Protection Policy establishes a clear framework to ensure that every activity carried out by Impacto, including research, training, events, networking, and EU-funded projects, is implemented in line with the highest safeguarding standards.

The Policy is grounded in key international and European legal instruments, including:

- **United Nations Convention on the Rights of the Child (UNCRC, 1989)**, ratified by Italy with Law no. 176/1991.
- **Lanzarote Convention** (Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse, 2007), ratified by Italy with Law no. 172/2012.
- **Charter of Fundamental Rights of the European Union (2000/C 364/01)**, Article 24: recognises the rights of the child, the right to protection and care, and the principle that the child's best interests must be a primary consideration in all actions.
- **EU Strategy on the Rights of the Child (2021–2024)**, establishing a comprehensive agenda for the protection, participation, and empowerment of children across the EU.
- **General Data Protection Regulation (GDPR, EU Regulation 2016/679)**, Article 8: requires parental consent for the processing of children's personal data under the age of 16 (with the possibility for Member States to set a lower age limit, not below 13). In Italy, this threshold is set at 14 years (Art. 2-quinquies, Legislative Decree no. 196/2003 as amended by Legislative Decree no. 101/2018).
- **Digital Services Act (Regulation (EU) 2022/2065)**, which obliges online platforms to assess and mitigate specific risks for minors (including exposure to harmful content, online abuse, and manipulation).

The Policy is grounded in key Italian national legal instruments, including:

- **Italian Constitution**, Articles 30–31: establish the duty of parents and the Republic to protect children's rights.
- **Law no. 184/1983** ("Right of the child to a family"), as amended, safeguarding children deprived of parental care.

- **Law no. 77/2017**, ratifying the Council of Europe Convention on preventing and combating violence against women and domestic violence (Istanbul Convention), with explicit protections for minors.
- **Legislative Decree no. 81/2008** and subsequent amendments, which include obligations for the protection of minors in training and work-related contexts.
- **National Guidelines of the Italian Data Protection Authority (Garante Privacy)** regarding the use of images and personal data of minors (2012, updated 2021).

The purpose of this policy for Impacto is to highlight its commitment to:

- **Prevention:** actively preventing any form of physical, emotional, or sexual abuse, neglect, exploitation, or discrimination against children involved in its activities.
- **Protection:** establishing procedures to identify, report, and respond promptly to safeguarding concerns, in cooperation with competent authorities (Tribunale per i Minorenni, Servizi Sociali, Autorità di Pubblica Sicurezza).
- **Participation:** ensuring that children have a voice in activities that affect them, consistent with Article 12 UNCRC, in forms appropriate to their age and maturity.
- **Accountability:** guaranteeing transparency, regular monitoring, and continuous improvement of safeguarding practices, in line with the **Keeping Children Safe Child Safeguarding Standards**.

2. Guiding Principles

The safeguarding approach of Impacto is grounded in a set of **fundamental principles that derive from international conventions, European Union frameworks, and Italian law**. These principles are not only ethical commitments but also binding legal standards that guide all of our activities and relationships whenever children are involved.

A first and overarching principle is the **best interests of the child**. According to Article 3 of the United Nations Convention on the Rights of the Child (UNCRC, 1989), ratified in Italy with Law no. 176/1991, and reaffirmed in Article 24 of the Charter of Fundamental Rights of the European Union, every action that affects children must place their best interests as a primary consideration. Italian law echoes this principle in Article 315-bis of the Civil Code, recognising the child's right to care, education, and moral development. For Impacto, this means that every project, training initiative, or research activity undergoes careful consideration to ensure that decisions strengthen, rather than endanger, the wellbeing of minors. The "*child impact*" dimension is an essential part of our organisational culture.

A second guiding principle is the **zero-tolerance approach to abuse and exploitation**. Impacto does not accept, under any circumstance, behaviours or practices that could harm children physically, psychologically, or emotionally. This principle is firmly rooted in the Council of Europe's Lanzarote Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse (ratified in Italy with Law no. 172/2012), in the Italian Penal Code provisions concerning child protection (Articles 600–609 on trafficking, slavery, sexual violence, and exploitation), and in the Istanbul Convention on preventing and combating violence against women and domestic violence (Law no. 77/2013), which explicitly addresses the protection of minors. Within Impacto, this translates into strict codes of conduct, mandatory training, and immediate disciplinary or legal action whenever a breach is suspected or confirmed.

Equally central is the principle of **non-discrimination and inclusion**. All children, without exception, are entitled to equal protection and opportunities, regardless of gender, ethnicity, religion, disability, sexual orientation, socio-economic background, or migration status. This principle finds its basis in Article 2 of the UNCRC, Article 21 of the EU Charter of Fundamental Rights, and Article 3 of the Italian Constitution, which proclaims equality before the law without distinction of sex, race, language, religion, political opinion, or personal and social conditions. For Impacto, inclusion is a practical commitment: our projects integrate accessibility measures, gender-sensitive methodologies, and communication strategies adapted to children with different needs, including those belonging to vulnerable or marginalised groups such as unaccompanied minors, Roma children, or children with disabilities.

The **right of the child to be heard and to participate** is another cornerstone of Impacto's safeguarding framework. Article 12 of the UNCRC enshrines the right of children to express their views freely in matters affecting them, and requires that those views be taken into account in line with the child's age and maturity. This principle is reinforced by the EU Strategy on the Rights of the Child (2021–2024) and, at national level, by Law no. 451/1997 establishing the National Observatory on Childhood and Adolescence, which promotes children's participation in policymaking. Impacto ensures that children engaged in its activities are not passive recipients but active participants, using child-friendly methods such as creative workshops, storytelling, and gamified learning. Consent of parents or guardians, as well as the assent of the child, is always sought to ensure meaningful and safe participation.

Safeguarding also extends to the **protection of children's personal data and privacy**, a particularly sensitive area in the digital age. Article 8 of the General Data Protection Regulation (GDPR, EU Regulation 2016/679) establishes the need for parental consent when processing personal data of children under the age of 16, with Italy having set the threshold at 14 years through Article 2-quinquies of the Italian Privacy Code (Legislative Decree no. 196/2003, as amended). The Italian Data Protection Authority (Garante Privacy) has further issued specific guidelines on the use of images and personal data of minors, updated in 2021. At European level, the Digital Services Act (Regulation EU 2022/2065) introduces obligations for online platforms to assess and mitigate risks for minors, including exposure to harmful content and grooming. For Impacto, these norms translate into a "safety by design" approach to all digital and

communication practices: no child's image is published without explicit written parental consent, and all data is collected and stored under strict privacy safeguards.

The principle of **transparency and accountability** ensures that safeguarding is not only declared but demonstrable. The Keeping Children Safe Standards, recognised at international level, require organisations to make their safeguarding policies public, to monitor their implementation, and to report on progress. EU grant agreements, including those under the Citizens, Equality, Rights and Values Programme (CERV), explicitly require private organisations working with minors to adopt such policies. Impacto is therefore committed to publishing this Policy on its website, to regularly training its staff and volunteers, and to reviewing the policy annually or whenever legislative or contextual changes occur. A safeguarding focal point is appointed within the organisation to ensure continuous oversight and to act as a reference person for both internal staff and external stakeholders.

3. Scope and Definitions

This Child Protection Policy applies to **all individuals who, in any capacity, are connected to Impacto**. This includes permanent staff, temporary collaborators, board members, trainers, consultants, interns, and volunteers. The policy also extends to **partners, subcontractors, and external service providers** engaged in projects where children may be directly or indirectly involved. Every person falling under this scope is expected to understand, respect, and apply the principles and procedures set out in this document.

The policy covers **all organisational contexts** in which Impacto operates: research and training activities, workshops, community and cultural events, transnational project meetings, and digital communication platforms, including the use of social media and online learning environments. The safeguarding obligations are valid both in **Italy** and in any **international or European projects** coordinated or participated in by Impacto.

In order to avoid ambiguity, the following key terms are defined according to internationally recognised standards and national legislation:

Term	Definition	Reference Norms
Child	Any person under the age of 18.	Article 1 UNCRC (1989); Art. 2 Italian Law no. 176/1991 ratifying UNCRC.

Safeguarding	All measures taken to protect children from harm, ensuring their wellbeing, and creating safe environments where their rights are upheld. Goes beyond responding to abuse, including proactive prevention.	Keeping Children Safe Standards (2021); EU Strategy on the Rights of the Child (2021–2024).
Child Protection	Specific actions and procedures aimed at responding to cases of abuse, neglect, exploitation, or harm suffered by a child, including referral to competent authorities.	Lanzarote Convention (2007, Law 172/2012); Italian Penal Code, Arts. 600–609.
Abuse	Any form of physical, emotional, sexual mistreatment or neglect that results in actual or potential harm to a child's health, development, or dignity.	UNCRC Art. 19; WHO definitions; Italian Penal Code (Arts. 571–609).
Neglect	Persistent failure to meet a child's basic needs (food, shelter, health, education, supervision, protection from danger). Considered a form of abuse when it leads to harm or risk of harm.	UNCRC Art. 27; Italian Civil Code Art. 147 (parental duties).
Exploitation	Use of children for someone else's advantage, gratification, or profit, including sexual exploitation, labour exploitation, and online exploitation.	ILO Convention No. 182 (1999); Italian Penal Code Art. 600 (slavery), 609-bis (sexual violence).
Child Safeguarding Concern	Any situation where there is reason to believe that a child is at risk of, or has experienced, harm, abuse, neglect, or exploitation.	Keeping Children Safe Standards; CERV call requirements.

By adopting these definitions, Impacto ensures that there is **no ambiguity** about what constitutes harm or risk to children. All staff and partners are required to act whenever they become aware of a concern, even if it appears minor or uncertain, following the reporting procedures described later in this policy.

The scope of this Policy is therefore deliberately broad, recognising that **every context where Impacto operates carries a safeguarding responsibility**, whether children are directly involved as participants or indirectly impacted by the organisation's research, communications, or advocacy.

4. Governance & Organisational Responsibilities

The effectiveness of a Child Protection Policy depends not only on principles and procedures but also on a **clear governance structure**. For Impacto, safeguarding children is a responsibility that cuts across all organisational levels. It is not confined to a single role but requires the active engagement of leadership, staff, volunteers, and partners.

The **Board of Directors of Impacto ETS**, in accordance with the Italian Third Sector Code (Legislative Decree no. 117/2017), carries the ultimate responsibility for ensuring that safeguarding is embedded in the organisation's strategy, governance, and daily operations. The Board formally approves this Policy and guarantees the allocation of adequate resources—financial, human, and technical—for its implementation.

Furthermore, Impacto appoints a **Child Protection Focal Point (CPFP) identified in the figure of the Vice-president Valentina Crepaldi**, who acts as the designated safeguarding lead within the organisation. This person has the mandate to:

- serve as the first point of contact for any safeguarding concerns;
- receive and document reports, ensuring confidentiality and compliance with GDPR;
- liaise with national competent authorities (such as the *Tribunale per i Minorenni*, local *Servizi Sociali*, and law enforcement agencies) when necessary;
- monitor compliance with safeguarding standards across projects and partnerships;
- coordinate safeguarding training for staff, volunteers, and external collaborators.

The CPFP operates independently from programme management lines to guarantee impartiality and is directly accountable to the Board of Directors.

All individuals working with or on behalf of Impacto—including employees, trainers, researchers, and interns—are bound by this Policy and by the **Code of Conduct** annexed to it. They must:

- familiarise themselves with the Policy and participate in mandatory safeguarding induction;
- act to prevent risks whenever possible and report concerns immediately;
- respect rules on child participation, communication, and use of digital tools;
- cooperate fully in any internal or external investigation.

Failure to comply with these obligations may result in disciplinary action, termination of contract, and, where applicable, referral to judicial authorities, in accordance with the Italian Penal Code provisions on crimes against minors (Arts. 600–609).

Impacto collaborates with numerous national and international organisations through EU projects (e.g. Horizon Europe, CERV, Erasmus+). In line with the requirements of the **Citizens, Equality, Rights and Values Programme (CERV)** and the **Keeping Children**

Safe Standards, all partners and subcontractors who engage in activities involving children must either:

- adopt and implement their own Child Protection Policy, equivalent to the standards of Impacto;
- or
- formally agree in writing to comply with Impacto's Child Protection Policy.

Partner agreements and subcontracts include specific safeguarding clauses to ensure accountability across the consortium.

Impacto maintains a **Safeguarding Register**, in which all concerns, reports, and actions taken are documented, respecting the principles of confidentiality and data protection (GDPR, Art. 32 on security of processing). Annual safeguarding reports are presented to the Board and shared with partners as part of Impacto's commitment to transparency.

To strengthen accountability, Impacto aligns its safeguarding governance with the monitoring obligations set by the **Italian Garante per l'Infanzia e l'Adolescenza** and with international evaluation frameworks such as the **Keeping Children Safe Self-Assessment Tool**.

5. Operational Procedures & Risk Management

Impacto recognises that principles and governance must be translated into **clear operational procedures** to create safe environments for children. These procedures are designed to prevent harm, mitigate risks, and provide staff, volunteers, and partners with unambiguous guidance on how to act when working in contexts where minors are present.

Before launching any project, training, or event that may involve children, Impacto conducts a **Child Risk Assessment**. This process identifies potential safeguarding risks—such as unsafe venues, unsupervised interactions, online exposure, or travel-related vulnerabilities—and defines preventive measures. Risk assessments are documented and updated throughout the project cycle. In line with the **Keeping Children Safe Standards**, risk management is considered a continuous process, not a one-off activity.

All activities involving children are designed and delivered according to strict safety guidelines. Staff and volunteers are expected to maintain professional boundaries at all times, avoiding behaviours that could be misinterpreted or harmful. For example, one-to-one interactions with children are discouraged unless strictly necessary and authorised, and in such cases they must take place in visible and open spaces

("two-adult rule"). Physical contact is limited to what is appropriate and necessary, such as first aid or age-appropriate guidance, and must always respect the child's dignity.

The protection of children's images and voices is a core safeguarding priority. In compliance with the **General Data Protection Regulation (EU 2016/679)** and the Italian Privacy Code (Legislative Decree no. 196/2003, as amended), Impacto requires **written informed consent** from parents or legal guardians before taking, storing, or publishing photographs, videos, or audio recordings of minors. Even with consent, images are used with caution: children's names are not published alongside photographs, and no image that could expose a child to stigma, ridicule, or risk is ever used. Digital content is stored securely, with access restricted to authorised personnel.

As Impacto frequently works in international projects with digital platforms, safeguarding extends to the **online environment**. Following the requirements of the **EU Digital Services Act (Reg. 2022/2065)** and the guidelines of the Italian Garante Privacy, online activities are designed with **privacy-by-default and safety-by-design** principles. This means, for instance, using moderated chat functions in online workshops, avoiding unsupervised direct messaging between staff and minors, and providing children and families with clear instructions on safe digital participation. Any suspicion of online grooming, cyberbullying, or inappropriate contact must be reported immediately through internal procedures.

When children participate in activities requiring travel, Impacto applies enhanced safeguards. Consent from parents or guardians is mandatory, and detailed information is provided about travel arrangements, accommodation, and supervision. Children are never left unsupervised, and accommodation is organised to guarantee safety and appropriateness (e.g., no sharing of rooms between staff and minors). Emergency contacts and health information are collected in advance, in compliance with data protection regulations, and staff are trained in first aid and emergency response.

Impacto acknowledges that some children may face heightened risks due to disability, socio-economic disadvantage, minority status, or migration background. Procedures are therefore adapted to ensure **accessibility and non-discrimination**. This includes providing interpretation or easy-to-read materials, ensuring physical accessibility to venues, and creating safe spaces for children who may have experienced trauma.

Safeguarding risks are not static. For this reason, Impacto incorporates **ongoing monitoring mechanisms** into every project. Feedback from children, parents, and partners is actively sought and documented. When risks are identified, procedures are promptly revised. In addition, safeguarding reviews are included in project evaluations, ensuring alignment with both EU funding requirements and Italian child protection laws.

6. Reporting, Response and Case Management

Even the most rigorous prevention systems cannot eliminate all risks. For this reason, Impacto has established **clear and transparent procedures** to report, respond to, and manage safeguarding concerns. These procedures are designed to ensure that all cases are handled promptly, fairly, and in the best interests of the child, in line with Italian, European, and international obligations.

All individuals working for or with Impacto—including staff, volunteers, consultants, interns, and partners—have a **mandatory duty** to report any suspicion, allegation, or evidence of abuse, neglect, exploitation, or any safeguarding concern involving children. This duty applies even if the information is incomplete or uncertain. Silence or inaction is considered a breach of both this Policy and professional responsibility.

Impacto has created a **confidential safeguarding channel**, managed by the **Child Protection Focal Point (CPFP)**. Reports can be made in writing (via a dedicated email address: childsafeguarding@impactocentrostudi.com), orally, or using a standardised incident report form included in the annex of this Policy.

Reports are logged in the **Safeguarding Register**, with strict compliance to GDPR provisions on confidentiality and data minimisation. Only the CPFP and the President of Impacto have access to the register.

Once a report is received, the CPFP will:

1. **Acknowledge receipt** of the concern and ensure the immediate safety of the child if necessary.
2. **Assess the nature of the concern** and determine whether urgent protective action is required.
3. **Consult with the President and the Board**, when appropriate, while respecting confidentiality.
4. **Escalate the case** to the competent external authorities, as required by Italian law.

In Italy, this includes the **Tribunale per i Minorenni (Juvenile Court)**, the **Public Prosecutor's Office (Procura della Repubblica)**, and local **Social Services (Servizi Sociali)**, as foreseen by Articles 331–334 of the Italian Code of Criminal Procedure, which impose an obligation to report suspected crimes against minors.

Impacto fully cooperates with law enforcement and judicial authorities in the management of child protection cases. This cooperation is carried out with respect for the **best interests of the child** and in compliance with the **Lanzarote Convention (2007, Law no. 172/2012)**, which requires member states and organisations to ensure effective investigation and prosecution of sexual exploitation and abuse of children. Impacto does not conduct parallel investigations that may interfere with judicial processes but provides all relevant information to the competent authorities.

Safeguarding concerns are handled with the utmost confidentiality. The identity of whistleblowers is protected under **Italian Legislative Decree no. 24/2023** (implementing EU Directive 2019/1937 on whistleblowing), which prohibits retaliation against those who report concerns in good faith. Similarly, children who are victims or witnesses of abuse are offered protective measures, including referral to psychological support services and victim assistance mechanisms.

Every safeguarding case is documented from the initial report to closure, with details on actions taken, outcomes, and lessons learned. The CPFP prepares a **case summary report** (anonymised where necessary) to be presented annually to the Board.

If the concern involves Impacto staff or associates, immediate precautionary measures (suspension from duty, restriction of contact with children) are adopted while investigations proceed. Disciplinary measures, including termination of contract, are applied in proven cases.

Each reported case becomes an opportunity for institutional learning. After resolution, Impacto conducts a **safeguarding review**, identifying strengths and gaps in procedures and updating this Policy accordingly. In this way, safeguarding becomes not only a compliance requirement but also a process of continuous improvement and organisational accountability.

7. Child Participation, Family Engagement and Communication

Safeguarding is not only about preventing and responding to risks; it is also about **creating opportunities for children to be active agents** in their own protection and in the shaping of the activities that affect them. Impacto firmly believes that children's voices, when respected and listened to, strengthen the effectiveness of projects and help build a culture of trust, transparency, and empowerment.

Children have the **right to be heard**, as established by **Article 12 of the UNCRC** and reaffirmed in the **EU Strategy on the Rights of the Child (2021–2024)**. Impacto ensures that all its activities involving minors are designed to give space to their perspectives in ways that are **age-appropriate, inclusive, and safe**.

This may include participatory workshops using creative methods such as storytelling, drawings, or role-play; youth advisory groups within EU-funded projects; or digital engagement tools that allow children to express their opinions. Participation is always voluntary and never coerced, and children are free to withdraw at any time without negative consequences.

Families and legal guardians are the primary protectors of children and play a crucial role in safeguarding. Impacto recognises their authority and responsibility, and seeks to involve them in every stage of project design and implementation.

Parents and guardians are informed in advance about the purpose, content, and methods of activities involving their children, and their **informed written consent** is required for participation, particularly when travel, accommodation, or use of images

and personal data are involved. Impacto provides families with clear contact points—such as the Child Protection Focal Point and project managers—so they can raise concerns, ask questions, or provide feedback.

Transparency is essential to build trust. This Policy is made publicly available on the Impacto website and is shared with all staff, volunteers, and partners. For activities involving children, **child-friendly versions** of safeguarding commitments are prepared, using simple and accessible language or visual formats so that minors can understand their rights and know who to turn to if they feel unsafe.

Impacto also commits to publishing **summarised safeguarding reports** on an annual basis, highlighting progress, training completed, and any lessons learned from case management. These reports are anonymised to protect confidentiality but serve to demonstrate accountability to children, families, partners, and funders.

All communication, whether online or offline, respects the dignity and privacy of children. This includes:

- avoiding language or images that stereotype, stigmatise, or sensationalise;
- ensuring that children's stories are told with respect and accuracy, with their consent and the consent of their guardians;
- moderating online spaces to prevent cyberbullying, grooming, or other forms of digital harm, in line with the **Digital Services Act (Reg. EU 2022/2065)**.

Through these commitments, Impacto creates not only a safe environment for children but also a space where they can **actively contribute to building better policies, projects, and practices**. Families are treated as partners in this process, and communication is designed to foster a community of mutual respect and shared responsibility.

8. Data Protection and Privacy of Children

The protection of children's personal data is a central element of safeguarding. Minors are particularly vulnerable when it comes to privacy breaches, misuse of personal information, or exposure through digital media. For this reason, Impacto applies a **"safety by design and privacy by default"** approach in all activities, in full compliance with European and Italian data protection frameworks.

The collection, storage, and use of children's personal data within Impacto's projects are governed by:

- the **General Data Protection Regulation (GDPR, EU Regulation 2016/679)**, which establishes the right to data protection as a fundamental right and sets specific conditions for the processing of minors' data;
- **Article 8 GDPR**, which requires parental consent for the processing of personal data of children under the age of 16 when offering information society services.

Italy has set this threshold at **14 years** through **Article 2-quinquies of Legislative Decree no. 196/2003 (Italian Privacy Code, as amended by Legislative Decree no. 101/2018)**;

- the **Guidelines of the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali)** on the processing of data of minors, including specific provisions on the use of images and videos in schools, associations, and public communication (latest updates 2021);
- the **Digital Services Act (Regulation EU 2022/2065)**, which requires platforms and organisations to assess and mitigate systemic risks for minors online, including grooming, cyberbullying, and harmful content.

Impacto collects personal data of children only when strictly necessary for participation in projects, training, or events, and always on the basis of:

- **explicit, informed, and written consent** from parents or legal guardians;
- **assent of the child**, when age and maturity allow, to respect the principle of participation and transparency.

Data collected are limited to what is essential (principle of data minimisation), and never include sensitive information unless absolutely necessary (e.g. health data for travel safety or accessibility reasons). In such cases, additional safeguards are applied, including restricted access and limited retention periods.

All personal data are stored securely, with digital files protected by encryption and restricted access, and physical files kept in locked archives. Data are retained only for the duration necessary to fulfil the purpose for which they were collected, after which they are securely deleted. Access to children's data is limited to authorised staff and, when applicable, project partners bound by data processing agreements in line with Article 28 GDPR.

Photographs, videos, and audio recordings of children are considered personal data under GDPR. Impacto follows strict rules:

- no image or recording of a child is taken or published without the **prior written consent** of the parent or guardian, obtained through a specific consent form;
- children's names are not published alongside their images to prevent identification;
- images are never used in contexts that may expose the child to ridicule, discrimination, or harm;
- in digital publications, metadata that could reveal a child's location or identity are removed before uploading.

In projects that involve digital platforms, Impacto applies additional protections:

- moderated communication channels to prevent direct, unsupervised contact between staff and minors;
- clear codes of conduct for online interactions;
- regular monitoring of project websites, learning platforms, and social media to prevent harmful content or unauthorised sharing of children's data;
- application of the "age-appropriate design" principle, ensuring that digital tools are adapted to children's developmental needs and capacities.

In line with GDPR and Italian legislation, children and their guardians are informed of their rights regarding data protection, including the right to access, rectify, or erase their data, and the right to withdraw consent at any time. Families receive transparent information on how Impacto processes and protects their children's data, through dedicated privacy notices attached to project documentation.

9. Monitoring, Evaluation and Policy Review

The value of a Child Protection Policy lies not only in its formal adoption but in its **effective and consistent implementation**. For this reason, Impacto has established a system of monitoring, evaluation, and review designed to ensure that safeguarding measures remain robust, transparent, and continuously improved.

Safeguarding is monitored at both organisational and project levels. The **Child Protection Focal Point (CPFP)** oversees the daily implementation of procedures, ensuring that risk assessments are completed, staff training is carried out, and reporting mechanisms are functional. Each project that involves minors must include a safeguarding component in its work plan, aligned with the requirements of the **Citizens, Equality, Rights and Values (CERV) Programme** and the **Keeping Children Safe Standards**.

The CPFP maintains a **Safeguarding Register**, documenting all reports, actions taken, and follow-up measures. This register is reviewed quarterly to identify trends, recurring issues, and areas needing improvement. The register is confidential but forms the basis of internal reporting to the Board of Directors.

Impacto evaluates the effectiveness of its safeguarding measures through:

- **Annual Safeguarding Reports**, prepared by the CPFP and presented to the Board. These reports summarise training delivered, concerns raised, actions taken, and lessons learned, while respecting confidentiality.
- **Feedback mechanisms** involving children, families, staff, and partners, to capture their perceptions of safety, accessibility, and inclusion in Impacto's activities. Feedback is collected through surveys, debriefing sessions, or focus

groups, depending on the project context.

- **Independent assessments**, when required by funders or international standards, to ensure external validation of safeguarding practices.

Evaluation also includes an assessment of compliance with national and EU regulations, such as GDPR, Italian privacy guidelines, and reporting obligations under the **Italian Code of Criminal Procedure** regarding crimes against minors.

This Policy is considered a **living document**, subject to regular revision to reflect new legislation, evolving risks, and lessons learned. Impacto commits to:

- reviewing the Policy **at least once every two years**, or more frequently if significant legal, organisational, or contextual changes occur;
- updating the Policy immediately in response to serious safeguarding incidents, external audit recommendations, or new EU/Italian child protection guidelines;
- circulating revised versions to all staff, volunteers, and partners, and publishing updates on the Impacto website for transparency.

The revision process is participatory: feedback from staff, volunteers, partners, and, where appropriate, from children and families, is integrated into the updated version. Each revised Policy is formally approved by the Board of Directors and signed by the President of Impacto, in line with governance obligations under the **Italian Third Sector Code (Legislative Decree no. 117/2017)**.

Impacto is accountable not only to funders and partners but above all to children and their families. By publishing this Policy, producing regular safeguarding reports, and making its procedures accessible, the organisation ensures transparency. Accountability is also guaranteed through compliance with external bodies such as the **Italian Garante per l'Infanzia e l'Adolescenza** and the **Garante per la Protezione dei Dati Personali** (Italian Data Protection Authority).

Through systematic monitoring, rigorous evaluation, and regular review, Impacto ensures that safeguarding is not a static requirement but a **dynamic and evolving commitment**, reflecting the organisation's dedication to children's rights, wellbeing, and dignity.

10. Appendices and Supporting Tools

To ensure the effective implementation of this Policy, Impacto provides a set of **operational tools and annexes** that support staff, volunteers, and partners in applying safeguarding principles on a daily basis. These documents are integral parts of the Policy and are updated in parallel with it.

The Code of Conduct translates the safeguarding principles into **practical behavioural rules**. It defines acceptable and unacceptable conduct in interactions with children, including:

- maintaining professional boundaries at all times;
- avoiding situations of one-to-one unsupervised contact, unless strictly necessary and authorised;
- prohibiting any form of degrading, violent, sexualised, or discriminatory behaviour;
- ensuring respectful communication, both offline and online;
- respecting the child's privacy, dignity, and right to participation.
All individuals working with or for Impacto must sign this Code before engaging in activities.

To standardise safeguarding practices, Impacto has developed:

- a **Child Protection Incident Report Form**, to document concerns, allegations, or observed risks, including details of the child involved, the nature of the concern, immediate actions taken, and signatures of the reporter;
- a **Flowchart for Reporting and Response**, which visually illustrates the step-by-step procedure to be followed from the moment a concern is raised to its resolution, including escalation to external authorities where required;
- a **Safeguarding Register Template**, used by the Child Protection Focal Point to track and monitor cases.

Parents or legal guardians must provide **written informed consent** for:

- participation of children in Impacto projects or events;
- travel and accommodation arrangements;
- photography, video, or audio recording of children;
- collection and use of sensitive personal data, where necessary.
Consent forms are drafted in compliance with GDPR, the Italian Privacy Code, and the guidelines of the Italian Data Protection Authority (*Garante Privacy*).

To ensure accessibility, Impacto prepares a simplified, child-friendly version of this Policy. Using **clear language and visuals**, this document explains children's rights, expected behaviour from adults, and contact points for raising concerns. The summary is distributed during activities and published on the Impacto website.

An annexed glossary defines the main safeguarding terms—such as abuse, neglect, exploitation, child safeguarding concern—in plain language, accompanied by references to the relevant international, European, or Italian legal sources. This tool helps ensure that all stakeholders, regardless of their background, share a common understanding of terminology.

Impacto maintains a set of training modules and checklists for safeguarding induction and refresher training, including:

- a **Safeguarding Induction Checklist**, to verify that every new staff member or volunteer has read the Policy, signed the Code of Conduct, and completed initial training;
- **Workshop slides and guidelines** on child rights, recognising abuse, and safe digital practices;
- a **Partner Compliance Checklist**, used to verify that external organisations involved in projects meet Impacto's safeguarding standards.

The appendices also contain a consolidated list of relevant legal instruments, including the UNCRC, the Charter of Fundamental Rights of the EU, the GDPR, the Digital Services Act, and Italian laws such as Law no. 176/1991, Law no. 172/2012, and the Italian Privacy Code (D.Lgs. 196/2003). This reference list allows staff and partners to easily access the legal frameworks underpinning Impacto's safeguarding commitments.

The appendices are not static: they are reviewed, expanded, and updated in line with changes in legislation, international standards, or lessons learned from practice. Together with the main Policy, they constitute a comprehensive safeguarding toolkit that ensures children's protection is embedded in every aspect of Impacto's work.



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