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CHILD PROTECTION POLICY

2026

POLICY GUIDELINES, PRINCIPLES AND PROCEDURES ON CHILD SAFEGUARDING AND PROTECTION

AT CESIE ETS

Version: January 2026

INTRODUCTION

The present document is annexed to **CESIE ETS's Code of Conduct.** The document represents CESIE ETS's **policy, principles and procedures** regulating child safeguarding and protection measures taken by staff members of CESIE ETS within the undertaking of their professional roles. It applies to all activities, programmes, and interactions involving children, whether conducted in person, online, or in hybrid settings.

CESIE ETS affirms its belief in the **rights of all children,** including the right to **be protected from all forms of violence, abuse**, neglect and exploitation and to **develop to their full potential,** be healthy and happy, as set out in the 1989 UN Convention on the Rights of the Child (UNCRC) and in the Council of Europe Convention on Protection of Children against Sexual Exploitation and Sexual Abuse (Lanzarote Convention, 2007).

Children with whom CESIE ETS staff, volunteers, interns, external collaborators, and associates come in contact will be assured the rights expressed in the UNCRC. This policy applies equally to all children, regardless of gender, age, disability, ethnicity, nationality, religion, sexual orientation, socio-economic background, or any other status. Through its work, CESIE ETS aligns with the EU Strategy for the rights of the child and promotes action to support children's participation in political and democratic life, their economic and social inclusion, their right to health and to education, providing equal opportunities to all children, to prevent violence against children and to protect them from violence, to promote a justice system that responds to the needs of children, to promote a safe digital experience for all children, and to support children globally.

CESIE ETS **takes the prevention of child abuse very seriously**. CESIE ETS understands that child abuse and inappropriate contact with children is a pervasive problem throughout the world that must be managed proactively. Therefore, the writing of this policy shows the **commitment to taking proactive steps to safeguard and protect children** in CESIE ETS's programmes, facilities, and networks, both online and offline. CESIE ETS adopts a zero-tolerance approach to any form of child abuse, exploitation, or harm.

CESIE ETS is committed to making decisions and taking actions that are guided by the principle of the **"best interest of the child"**. All safeguarding actions are informed by a child-centred, rights-based, and survivor-sensitive approach, ensuring confidentiality, dignity, and respect for children at all times.

The document counts six different sections which address:

1. definitions used in the policy and CESIE ETS's work,

2. values and principles, which should be respected and promoted by all staff members,
3. screening and hiring practices at CESIE ETS,
4. principles of conduct & procedures of staff in contact/working with children,
5. reporting procedures in case of any child abuse concerns staff members may have or suspect,
6. cooperation with other external organisations, networks, and agencies.

CESIE ETS's Child Protection Policy is produced by the Child Protection Officer and approved by the Board of Directors. The document is evaluated against EU standards and practical experience and updated at least once a year.

1. DEFINITIONS

For the purposes of the present policy, the following definitions apply:

- Best Interest of the Child (BIC)

  A threefold concept: a right, a principle and a rule of procedure based on the assessment of all elements of a child's or children's interests in a specific situation both in the public and private sphere which must be determined on a case-by-case basis taking into consideration their personal context, situation and need.

  Accordingly, the concept of the best interests of the child is flexible and adaptable. It aims to ensure both the full and effective enjoyment of all the rights recognised in the 1989 UN Convention on the Rights of the Child (UNCRC) and the holistic development of the child. Its full application requires the development of a rights-based approach, engaging all actors to secure the holistic physical, psychological, moral and spiritual integrity of the child and promote his or her human dignity.[1]
- Child[2]

  Every human being below the age of eighteen years old.[3]
- Child-centred approach

  An approach used to make decisions regarding the life of a minor that acts in their best interest and involves collaboration with them and their family.[4]
- Child Protection

  The prevention and response to violence, exploitation, and abuse of children in all contexts.[5]
- Child participation

  Is a fundamental principle that ensures that children, any person under the age of 18 years, individually or in groups, have the right, the means, the space, the opportunity and, where necessary, the support to freely express their views, to be heard and to contribute to decision making on matters affecting them, their views being given due weight in accordance with their age and maturity. In order to be able to participate meaningfully and

[1] As defined by the Committee on the Rights of the Children, General comment No. 14 (2013) on the right of the child to have his or her best interests taken as a primary consideration (art. 3, para. 1)* - Available at: https://www2.ohchr.org/English/bodies/crc/docs/GC/CRC_C_GC_14_ENG.pdf

[2] For the purpose of this policy, we use child/children and minors interchangeably.

[3] As defined by the UN - Convention of the Rights of the Child. Available at: https://www.ohchr.org/en/professionalinterest/pages/crc.aspx

[4] As defined by Working Together Online. Available at: https://www.workingtogetheronline.co.uk/chapters/intro.html#:~:text=A%20child%20centred%20approach%20means,with%20them%20and%20their%20families

[5] As defined by UNICEF. Available at: https://data.unicef.org/topic/child-protection/overview/

genuinely, children and young people should be provided with all relevant information and offered adequate support for self-advocacy appropriate to their age and circumstances.[6]

- Child safeguarding

  Preventative actions to ensure that all children are protected from deliberate or unintentional acts that lead to the risk of or actual harm.[7]

- Staff members

  Refers to paid staff, volunteers, interns, and external collaborators.

CESIE ETS takes all measures to protect the child from all forms of child maltreatment and inappropriate behaviours. Child maltreatment is the abuse and neglect that occurs to children under 18 years of age. It includes all types of physical and/or emotional ill-treatment, sexual abuse, neglect, negligence and commercial or other exploitation, which results 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 both in presence or through information technology.

Specifically, CESIE ETS defines it but is not limited to the following:

- Abandoned or Unaccompanied Minor

  A child who is not accompanied by an adult legally responsible for him or her, including those traveling alone without custodial permission, those separated by an emergency, those in a refugee situation, and those who have been abandoned or otherwise left without any adult care[8].

- Child Abduction

  The crime of removing a child from its rightful home[9].

- Physical Child Abuse

  An injury deliberately inflicted upon a child by any person, including adults. Physical abuse includes fractured or broken bones, burns, severe and/or frequent bruises, and any other intentionally inflicted physical harm.[10]

- Child Emotional Abuse

  An act leading to a child repeatedly made to feel worthless, unloved, alone or scared.

[6] As defined by the Council of Europe - Recommendation CM/Rec(2012)2 of the Committee of Ministers to member States on the participation of children and young people under the age of 18. Available at: https://search.coe.int/cm/Pages/result_details.aspx?ObjectID=09000016805cb0ca
[7] As defined by SaveTheChild. Available at: https://www.savethechildren.org/us/what-we-do/safeguarding-children
[8] As defined by the International Center for Missing and Exploited Children. Available at: https://www.icmec.org/global-missing-childrens-center/the-definition-of-missing/
[9] As defined in the Collins dictionary. Available at: https://www.collinsdictionary.com/dictionary/english/child-abduction
[10] As defined by Kids Matters - Physical Abuse. Available at: https://kidsmatterinc.org/child-safety/types-of-child-abuse/physical-abuse/

Instances include: continually ignoring or rejecting a child, physically or socially isolating a child, forcing a child to do things by scaring them, constantly criticising, humiliating or blaming a child, constantly swearing, yelling or screaming at a child, bullying, teasing, insulting or belittling a child, having unrealistic expectations or unreasonable demands of a child, not allowing a child to explore, express themselves, learn or make friends, treating a child badly because of things they can't change.[11]

- Child Sexual Abuse

  Any deliberate and unwanted act of a sexual nature, either completed or attempted, that is perpetrated against a child, including for exploitative purposes, and that results in or has a high likelihood of resulting in injury, pain or psychological suffering..[12]

- Child Pornography

  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.[13]

- Exploitation of Minors in Prostitution

  The use of a child in sexual activities for remuneration or any other form of consideration, such as goods, services, shelter, protection, favours, or any other benefit that the exploiter receives.

- (Child) Grooming

  An emotional connection built with a child to gain their trust for the purposes of sexual abuse, sexual exploitation or trafficking. Children and young people can be groomed online or face-to-face, by a stranger or by someone they know – for example, a family member, family member, friend or professional.[14]

- Bullying

  An unwanted, aggressive behaviour among school aged children that involves a real or perceived power imbalance. The behaviour is repeated, or has the potential to be repeated, over time.[15]

- Neglect or negligent treatment

  The failure to meet children's physical and psychological needs, protect them from danger, or obtain medical, birth registration or other services when those responsible for children's

[11] As defined by Kids HelpLine - Understanding Child Emotional Abuse. Available at: https://kidshelpline.com.au/parents/issues/understanding-child-emotional-abuse
[12] As defined by WHO - Child Sexual Abuse. Available at: https://www.who.int/violence_injury_prevention/resources/publications/en/guidelines_chap7.pdf
[13] As defined by Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse. Available at: https://rm.coe.int/1680084822
[14] As defined by the National Society for the Prevention of Cruelty to Children. Available at: https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/online-abuse/
[15] As defined by the European Council. Available at: https://www.coe.int/en/web/children/bullying

care have the means, knowledge and access to services to do so.[16]

- Child Exploitation

  An exploitation that includes child domestic work, child soldiers, the recruitment and involvement of children in armed conflict, sexual exploitation and pornography, the use of children for criminal activities including the sale and distribution of narcotics and the involvement of children in harmful or hazardous work.[17]

- Online sexual violence/ Cybersexual violence/ Technology-facilitated sexual violence

  Violence facilitated by and/or perpetrated through screens - ie, online platforms, websites and apps. It can take the form of physical, sexual, psychological, emotional or economic harm or suffering and may include the exploitation of the individual's circumstance, characteristics or vulnerabilities.

  Online sexual violence or Cybersexual violence or Technology-facilitated sexual violence (TFSV) refers to a range of behaviors where digital technologies are used to facilitate both virtual and face-to-face sexually based harms. Such behaviors can take many forms, among others: cyber-harassment and cyber-stalking; distributing sexual recordings; luring and online exploitation of minors by adults who establish contact with children over the Internet for the purpose of committing a sexual offence; online sexual assault; sextorsion; etc.[18]

2. PRINCIPLES AND VALUES

CESIE ETS is committed to the following values and principles, which should be respected and promoted by all its staff members:

- ✔ CESIE ETS values and treats every person **without discrimination of any kind**, irrespective of the age, colour, sex, language, religion, political or other opinions, national, ethnic, or social origin, language, gender identity or sexual orientation, property, disability, birth or other status, with a special attention to the needs of children on the move.
- ✔ CESIE ETS has a **zero-tolerance policy** towards any kind of inappropriate behaviour, violence or abuse including towards children.
- ✔ CESIE ETS recognises the **right of every child to be protected from harm and abuse** stemming from inappropriate behaviours as defined in Section 1 of the present policy. The

[16] As defined by UNICEF. Available at: https://www.unicef-irc.org/portfolios/general_comments/CRC.C.GC.13_en.doc.html
[17] As defined by Terres des Hommes. Available at: https://www.terredeshommes.org/causes/child-exploitation/
[18] As defined As defined in the article by Henry and Powell, 2016. Available at: https://rm.coe.int/t-cy-2017-10-cbg-study-provisional/16808c4914

Organisation takes all **necessary action to prevent** any harm from being done against children and to report abuse against children on the above.

- ✔ The **best interest of the child** always comes first in the undertaking of our Organisation's activities.
- ✔ CESIE ETS **promotes the right of children to be heard, participate, and share their views** in matters which affect them, and supports this approach in its activities.
- ✔ CESIE ETS conducts all its activities, from project design, risk management to implementation ensuring the safeguarding of children plays a central role and according to child-centred and trauma-informed approaches.
- ✔ CESIE ETS wishes to provide all necessary **guidance to its staff members** who work in close contact with children.

3. SCREENING AND HIRING PRACTICES

CESIE ETS **establishes and sustains proper hiring and selection practices**, including completed applications, reference checks, criminal background checks, social security checks and documented personnel files, and includes specific reference to Child Protection in its Code of Conduct. All practices are designed to ensure the safety and well-being of children and to prevent the recruitment of individuals who may pose a risk to children.

3.1. Applications

- All prospective staff members will complete an **application form** to work or volunteer or intern that includes questions regarding past work history, volunteer experience, and education.
- All application forms will include a **statement that CESIE ETS has a zero-tolerance** standard for any inappropriate behaviour, violence or abuse including towards children by staff members.
- All staff members who may be involved in working with children and young people, or who are deemed likely to come in contact with children in the fulfilment of their duties, will be requested to **provide a certificate of their national criminal record**, according to national legislation (Decreto del Presidente della Repubblica, 14 novembre 2002, n. 313 – specifically art. 25 bis). CESIE ETS will ensure that all collected certificates and sensitive documents are stored securely and accessed only by authorised staff.

3.2. Reference checks

CESIE ETS reserves the right to apply the following **reference check procedures** to any candidate applying for a post:

- Contacting references indicated by prospective staff members, including close family members to the applicant.
- Contacting previous employers/agencies to check if the prospective staff member is eligible for rehire, as well as to ask about the ability of the applicant to work with children.
- Verbally verifying written references via telephone or other means of contact.
- Researching a candidate online and checking for red flags for working with children (i.e. Google Search, any national sexual predator websites, and social networking sites).

3.3. Interviews

- Prospective staff members should be **interviewed** by at least two separate staff members. A 'Realistic Job Preview' or 'Working Interview' meets this requirement; it is important that the candidate is **assessed by more than one staff member**. During the

interview, candidates, applying for the position that might involve contact with children, will be asked about their understanding of child protection, their experience working with children, and how they would respond to safeguarding concerns.

- All interviews will be **documented on an association-approved interview form** that ensures the consistency of the questions asked. CESIE ETS interview evaluation forms may be used during the interview process.

3.4. Probation and Ongoing Monitoring

All newly recruited staff, volunteers, and interns who will have contact with children will undergo a probation period during which their conduct and adherence to child protection principles will be closely monitored. Supervisors will provide guidance and feedback, and any concerns regarding behaviour, performance, or safeguarding will be addressed immediately. Ongoing monitoring, including periodic performance reviews, ensures that staff members continue to meet CESIE ETS standards for working safely with children throughout their employment or engagement.

4. PRINCIPLES OF CONDUCT & PROCEDURES OF STAFF IN CONTACT/WORKING WITH CHILDREN

The following principles apply when coming in contact or working with children conduct-wise:

4.1. Compliance with CESIE ETS's Code of Conduct & Child Protection Policy

- Before performing any work duties, **staff members will sign and date a copy of the Code of Conduct** of the Organisation, to which the Child Protection Policy is annexed. When changes or updates are made once a year, all staff members will be provided with the new version, which must be signed in acknowledgement and acceptance.
- The Code of Conduct will be maintained in the personnel file and is annexed to their employment contract.
- All external collaborators will be provided with the Child Protection Policy and the Code of Conduct if they work or may come in contact with children and young people of less than 18 years of age.

4.2. Data protection mechanisms

The Code of Conduct includes the procedures for **data collection and treatment of data about children and young people**. Data privacy and protection issues shall comply with relevant EU rules (especially the General Data Protection Regulation (**GDPR**) (EU) 2016/679.

For the correct handling of child-sensitive data, the following rules apply:

- **Written Informed Consent:** If personal data about minors needs to be collected, written informed consent will be sought from their parents/legal guardians. The data will be collected and used only for the specific purposes for which they are provided. Staff working with children and needing to collect personal data about children or young people shall refer to the Data Protection Policy of CESIE ETS and to the General Data Protection Regulation (GDPR) (EU) 2016/679. CESIE ETS does not share the personal data provided with any other entity.
- **Declaration of Confidentiality**: Staff who may come in contact with the personal data of research participants is required to sign a declaration of confidentiality before engaging in research. The declaration of confidentiality is specific to each case/project.
- **Disclosure of information:** that identifies children who come in contact with our staff members and anyone having a role within CESIE ETS, **is restricted** by the terms of international, European and Italian regulations and legislation. Written informed consent of the parents/legal guardians shall be specifically sought. In general terms and in accordance with Article 3 of the UNCRC[19], the best interests of the child will be the fundamental principle applied in all cases. This includes disclosing any type of information (including images) regarding the children we come in contact with, on any media, including printed, online or other.

  Specifically, **data**, **including images,** of children are only collected if strictly necessary and foreseen as a specific activity of the Organisation or of a project that the Organisation implements. For instance, CESIE ETS collects declarations of participation and not attendance sheets when minors are involved in activities. Their use is therefore limited to the duration of the project, and the specific purpose for which they were provided and collected. Specific permission of the child's parents/legal guardians as well as the approval of the child will be sought by the staff of the Organisation implementing the activity, according to legal requirements. Acquired images and data are stored on the local server of CESIE ETS and are accessible only by the staff who have the specific credentials and who have subscribed to the Code of Conduct. The data in the local server is protected by a password and cyber-protected against any kind of external access.
- **Publications**: All publications must comply with the Child Protection Policy, before being publicized or shared. No identifying information of children shall be published without prior consent from both the child (if reached the age of majority) and their parents/legal guardians.

[19] United Nations Convention on the Rights of the Child. Available at: https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child

4.3. Training on Child protection

The rules and expectations will be shared with each new staff member and will be regularly reinforced with existing ones. This will be done in **new employee training, children's rights training, and the use of a comprehensive Code of Conduct.** Specifically:

- **All paid staff, volunteers and interns** (at minimum, those working directly with children) will participate in a comprehensive child protection training and in further training throughout their employment period, which includes information on the Rights of the Children (UNCRC, Lanzarote Convention, National regulation), Communicating with Children, Children participation and best interest of the child, Sexual abuse, Prevention, Early Identification, Responding, Documenting, and Reporting. The training programmes are inspired by existing resources and are developed by building on the programmes already developed through our relevant projects.
- **External collaborators** who may come in contact with children in the fulfilment of their tasks as assigned by CESIE ETS will participate in the same child protection training.

5. REPORTING PROCEDURES

- All staff members and external collaborators have an **obligation to report any child abuse concerns they may have or suspect** both from internal staff and in an external context**.** This includes suspicions of neglect, exploitation, physical or sexual abuse, or any inappropriate behaviour towards children. Staff members will be instructed to report anything they notice regarding a gap between policies and practices. Staff members working with or coming in contact with children will also be instructed, through training, on the internal protocols to apply in case they suspect or have knowledge of a situation of child abuse depending on the type of context.
- Reporting of a suspected breach of the Code of Conduct, and specifically of the Child Protection Policy, follows a standard procedure, which includes a **reporting form** (annexed to the Code of Conduct and reported here under the Annex section).
- Reports will be treated confidentially and sensitively. The Child Protection Policy Officer at CESIE ETS will evaluate each case depending on the perpetrator and the context taking place and either redirect the case to local support services or report further to Human Resources if deemed necessary. Child Protection Officer at CESIE ETS to this date:
    - Ms. Ruta Grigaliunaite - CESIE, ruta.grigaliunaite@cesie.org
- Any member of staff found in breach of the Code of Conduct, or of the Child Protection Policy on which the code draws, will be **evaluated on a case-by-case basis.** Disciplinary action could include retraining, formal warning, suspension, termination of employment/cessation of the professional engagement with CESIE ETS and referral to relevant authorities, depending on the severity of the case.
- **Severe breaches** must be reported externally as appropriate. CESIE ETS will follow mandatory reporting obligations and cooperate fully with authorities. Examples include:
    - Local Authorities: Polizia di Stato; Carabinieri
    - Social Services for Minors – Sicily
- Additionally, CESIE ETS will document all reports, actions taken, and outcomes to ensure accountability and facilitate internal learning to prevent future incidents.

6. COOPERATION WITH EXTERNAL ORGANISATIONS, NETWORKS AND AGENCIES

When coming in contact with external entities such as organizations, networks and/or agencies, CESIE ETS will proceed as follows:

- For each new collaboration with external organizations, networks and/or agencies, the

selection will **take into account the child protection policies, history and practices** of the entity.

- CESIE ETS reserves the right to **conduct a reference check** on the Partner's previous history related to child protection and its policies towards children.
- All partnership agreements, contracts, or Memoranda of Understanding (MoUs) **must include a clear statement on child protection and CESIE ETS's zero-tolerance policy regarding child abuse and inappropriate behaviour.**
- CESIE ETS will **not tolerate any inappropriate communication** towards children.
- A **clear statement related to child protection and the zero-tolerance policy** of CESIE ETS in relation to child abuse and inappropriate behaviour is included in the form for entities wishing to become partners of CESIE ETS on CESIE ETS website.
- CESIE ETS must take serious **action towards any partner convicted for child abuse** during the implementation of its projects/programmes.
- **Continuous monitoring** of partners will be conducted throughout the duration of projects/programmes to ensure compliance with CESIE ETS child protection standards.

Palermo, 23/01/2026

Vito La Fata
President

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Annex - CESIE ETS's Child Protection Policy

Reporting form for inappropriate behaviors

Information on the reporting subject[20]	
Name	
Surname	
Position within the organization	• Staff • Intern • Volunteer • Collaborator
Information on the alleged inappropriate behaviour reported	
Type of the alleged breach	• Physical child abuse • Child emotional abuse • Child sexual abuse • Bullying • Neglect or negligent treatment • Child exploitation • Other types of child maltreatment or inappropriate behaviour: _____
Context of the alleged breach	
Date	
Place	
Circumstance (training, event, etc.)	
Description of the alleged inappropriate behavior	
Please provide a brief description	
Have you observed this behavior personally? If not,	

[20] The reporting subject's data will be treated according to EU Regulation 2016/679 (The EU General Data Protection Regulation - GDPR), and for the exclusive purpose of this reporting. CSC's legal representative will be responsible for the treatment of this data. The reporting subject can refer to him in order to exercise their rights in conformity with Italian and European law.

how did you come to know about it?	
How would you judge the gravity of the behavior you described?	• Low • Medium • High • I don't know
To your knowledge, is this behavior repeated or ongoing?	• Yes • No • Don't know
Name(s) of the child victim (if known/applicable)	
Information on the alleged author of the breach	
Name	
Surname	
Position within the organization	• Staff • Intern • Volunteer • Collaborator

Declaration

By submitting this report, the reporting subject declares that:

- ➔ He/she/they understand/s that the report will be handled confidentially and that CESIE ETS will take all necessary measures to protect the identity of both the reporting subject and the child involved.
- ➔ He/she/they is/are aware that, should the report give rise to legal action on behalf of CESIE ETS, it may be used as an official statement,
- ➔ He/she/they is/are in good faith and that all the information provided above is correct and truthful,
- ➔ He/she/they is/are aware that purposely providing false accusations against someone is a breach punishable by Italian law.
- ➔ He/she/they understand/s that follow-up actions may include contact from the Child Protection Officer for additional information, and that protective measures for the child may be implemented immediately.

The reporting subject **Date**
(Read and approved)