

CHILD SAFEGUARDING POLICY

Introduction

AFOL Metropolitana is a special consortium currently owned by the metropolitan city of Milan and the 71 Municipalities of the greater metropolitan area founded in 2015.

AFOL Metropolitana, Agency for training, orientation and work, is a public company that offers a complete range of work and training services for individuals and companies based on the logical integration of its functions and their strong orientation towards the job market.

The integration of training, orientation and work services represents one of the Agency's greatest strengths and multiplies its effectiveness in implementing and achieving specific objectives.

AFOL helps citizens in need of reacquiring the qualifications sought for job placement, strengthening their professional skills, supporting them in their transitional phases and helping them avoid the risks of social exclusion as they adapt to possible socio-educational changes. At the same time, the Agency provides a range of services to local businesses to support and assist them with administrative procedures as they search for professional profiles to include in their workforce, both training staff and participating in projects or initiatives encouraging innovative process and product development. The integrated delivery of a complete range of services, as well as, the effective collaboration with public and private bodies and local and non-local economic actors, make AFOL Metropolitana that model of excellence recognized nationally and looked upon favourably by a number of foreign partners.

Principles

AFOL Metropolitana's Child Safeguarding Policy is based on The UN Convention on the Rights of the Child, 1989 (and its optional protocols).

The Policy upholds the following principles:

- all children have equal rights to protection from harm.
- everybody has a responsibility to support the protection of children.
- organisations have a duty of care to children with whom they work, are in contact with, or who are affected by their work and operations.
- if organisations work with partners, they have a responsibility to help partners meet the minimum requirements on protection.
- all actions on child safeguarding are taken in the best interests of the child, which are paramount.

Terms and definitions

Child: in line with Article 1 of the UN Convention on the Rights of the Child (1989), a child is defined as 'every human being below the age of 18 years.

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Via Soderini 24 – 20146 Milano
Tel 02 77404141 – protocollo@afolmet.it
P.IVA 08928300964

Abuse: a violation of an individual's human and civil rights by any other person or persons. It can take the form of physical, psychological, financial or sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the health, survival, development or dignity of a child, young person or vulnerable adult.

Abuse can be a single act or repeated acts and can be unintentional or deliberate. Abuse often involves criminal acts.

Discriminatory abuse: abuse motivated by a vulnerable person's age, race, nationality, sex, sexual orientation, disability, or other personal characteristic.

Neglect: the persistent failure to meet a vulnerable person's basic physical and/or psychological needs, likely to result in the serious impairment of his/her health or development. Examples include failure to provide adequate food, clothing and shelter, failure to protect them from physical or psychological harm or danger; failure to ensure adequate supervision (including the use of inadequate care-givers); or failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a vulnerable person's basic emotional needs.

Physical abuse: includes hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm, misuse of medication, restraint, or inappropriate sanctions.

Psychological abuse: includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks. Examples include not giving a vulnerable person opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on a vulnerable person, which may include interactions that are beyond a vulnerable person's developmental capability. It may involve serious bullying (including cyber bullying), or the exploitation or corruption of a vulnerable person.

Sexual abuse: involves forcing, enticing or coercing someone to take part in sexual activities, whether or not the vulnerable person is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving a vulnerable person in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse can be carried out by adults or other children.

Scope

This Policy is developed to ensure the highest standards of professional behaviour and personal practice to ensure no harm occurs in any situation to children during their involvement in any AFOL Metropolitana activities or projects.

This policy applies to all people working on projects that directly or indirectly involve children:

- all staff; Management Board members; interns and volunteers

- all those acting on behalf of AFOL Metropolitana such as members, consultants or trainers
- all those who participate in AFOL Metropolitana events and meetings involving children, including partner, donors, policy makers, etc.

Partners working on AFOL Metropolitana projects or events involving children agree to abide by AFOL Metropolitana's Child Safeguarding Policy and the code of conduct, or develop their own comparable policy as a condition of the partnership.

All the individuals cited above will be expected to read AFOL Metropolitana's Child Protection Policy and sign a commitment to adhere to its principles and procedures.

Staff recruitment, selection and training

All recruited and existing AFOL Metropolitana staff will be familiarized with the Child Safeguarding Policy and the associate Code of Conduct, with more extensive training for those whose work will directly or indirectly involve children.

AFOL Metropolitana will follow these procedures when recruiting staff for positions specifically dealing with children:

- the Child Safeguarding Policy will be referenced within the job posting.
- when the job requires direct or indirect contact with children, it is necessary to conduct background checks and acquire a criminal record certificate to reveal potential instances of child abuse
- when checking references from previous employers, a candidate's work with children will specifically be asked about.

Confidentiality and information sharing

AFOL Metropolitana expects all employees, volunteers and trustees to maintain confidentiality. Information will only be shared in line with the General Data Protection Regulations (GDPR) and Data Protection.

However, information should be shared with the Local Authority if a child is deemed to be at risk of harm or contact the police if they are in immediate danger, or a crime has been committed. For further guidance on information sharing and safeguarding see Mrs Valeria Cirocco and Information Sharing policies.

Use of children's images for work-related purposes

When photographing or filming a child for work-related purposes, it is important that:

- before photographing or filming a child, obtain written consent /permission from a parent or guardian of the child. As part of this it must be explained how the photograph or film will be used;

- ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive;
- ensure images are honest representations of the context and the facts; and ensure file labels do not reveal identifying information about a child when sending images electronically.

Safeguarding and information technology

Technological development has increased the possibilities for online exploitation of children. Social media and technology evolve rapidly and so we must remain vigilant to ensure that alongside the positive aspects of engaging via different technologies we recognise these provide opportunities for inappropriate contact with children (and others) and we must put safeguards in place.

Staff or other representatives who provide children with access to computers as part of an AFOL Metropolitana programme must ensure that children know how to use them safely in order to mitigate the risk of online sexual exploitation and other harmful behaviours.

There are a range of risks to children and young people in the online context. These include:

- contact Risks - children and young people can be at risk of contact behaviours such as bullying or grooming
- content Risks - children and young people can access content that is discriminatory, violent, sexual or extremist
- conduct Risks - young people can adopt risky behaviours such as creating their own sexual content without recognition of the impact (e.g. sexting, sending images of themselves to others) or bullying another young person.

Responsibilities

This policy has been approved by AFOL Metropolitana Legal Signatory in consultation with the appropriate senior administrators of AFOL Metropolitana and the Director. AFOL Metropolitana's management is responsible for ensuring the implementation of the policy with staff and partners through ongoing training and review.

The Director shall appoint a Child Protection Officer who shall be responsible for dealing with any reports of abuse against children and adolescents.

Not being a child protection agency and not having the necessary skills to carry out investigations on child abuse, AFOL Metropolitana will support the work of external bodies and / or experts.

Reporting procedures

AFOL Metropolitana is committed to building an effective reporting system for alleged child/adolescent abuse and ensures that all persons involved in the activities of the organization have clear actions to be taken promptly in the face of potential danger or mistreatment situations.

Internal reporting system

The Director shall appoint a Child Protection Officer who shall be responsible for dealing with any reports of abuse against children and adolescents.

The role of the Child Protection Officer must be publicised and made known within the staff and among beneficiaries and other relevant stakeholders, encouraging the prompt reporting of suspected abuse or ill-treatment. In every context in which AFOL Metropolitana operates, the necessary tools must be guaranteed, in particular for children to denounce any form of abuse, making them able to protect themselves and their peers.

The role of investigating an allegation of child abuse rests solely with Child Protection and/or the Police.

VET mandateci Staff (teachers, tutors, responsables) are obliged by law to report to Child Protection if, in the course of undertaking their professional duties, they form any reasonable belief that a child has suffered, or is likely to suffer, significant harm as a result of physical injury or sexual abuse, and the child's parents have not protected or are unlikely to protect the child.

Mandateci staff members should discuss any concerns they may have about the safety and wellbeing of students with the Responsible (or his delegate) or the Child Protection Officer, prior to making a report to authorities. This will enable AFOL Metropolitana to best provide support to the child, or young person, their family and our personnel, where appropriate. Note that Child First can also be contacted for advice if desired.

AFOL Metropolitana guarantees to anyone who expresses a suspicion of abuse, the utmost confidentiality in the management of the case and the information that may result from it. In following up allegations of abuse or ill-treatment, AFOL Metropolitana personnel must operate on the basis of principles that focus on the best interests of victims and witnesses, on ensuring their physical and mental health and safety, on respect for their rights to privacy, equality and access to justice.

External reporting system

Any abuse that is known, related or not with the programs implemented by the Agency, must be reported to the formal authorities.

In the local contexts in which it operates, AFOL Metropolitana undertakes to conduct a mapping of the services available for the protection of minors at a legal and social level, aimed at identifying the services and authorities that can be addressed in case of need.

Policy violation

The principles contained in this Policy are a specification of the duties of diligence, loyalty and impartiality that qualify the correct performance of the service. Their violation by the worker may constitute a fulfilment of the obligations inherent in the employment relationship and/ or disciplinary offence, with any consequences provided for by law or the National Collective Labour Agreement. Violations of the Policy by workers, trainees, consultants will lead, in case of a possible wrongdoing, to the complaint to the competent authorities.

Related Code of Conduct

All AFOL Metropolitana staff and partners whose work involves children are required to understand their responsibility to keep children safe and abide by the Child Safeguarding and associateci Code of Conduct. While the primary purpose is to protect children, the Child Safeguarding Code of Conduct¹ also serves to guard staff and partners from false accusations, and preserve the name and reputation of AFOL Metropolitana.

Any violation of the Code of Conduct by the staff or any person representing AFOL Metropolitana will result in disciplinary procedures.

Policy Review

This policy will be reviewed every 3 years. If there is any significant program or contextual changes, the policy may need to be reviewed more frequently. AFOL Metropolitana expects each AFOL's member to also review their policy at a minimum every 3 years and more frequently if there are significant programme or contextual changes.