SAFEGUARDING POLICY – ISTITUTO PACE SVILUPPO INNOVAZIONE ACLI - IPSIA

IPSIA adopts a comprehensive Safeguarding Policy that fully incorporates Child Safeguarding standards in line with EU guidelines and the Minimum Standards for Child Protection in Humanitarian Action (CPMS) developed by The Alliance for Child Protection in Humanitarian Action.
Our policy ensures a 'safety by design' approach, featuring zero-tolerance for abuse, mandatory reporting procedures for critical incidents, and specialized protection protocols for Unaccompanied and Separated Children (UASC) and vulnerable families.
Furthermore, our framework aligns with the UN Convention on the Rights of the Child, ensuring that the 'Best Interest of the Child' is the primary consideration in all our educational and protection activities

Purpose of this policy

The purpose of this policy is to protect people, particularly children, at-risk adults and beneficiaries of assistance (this includes people IPSIA may engage with for the purpose of consultation, research, or user testing) from any harm that may be caused due to their coming into contact with IPSIA.

This includes harm arising from:

- the conduct of staff or personnel associated with IPSIA
- the design and implementation of IPSIA's programmes and activities

At IPSIA there is a culture of zero tolerance for all forms of abuse and mistreatment.

The policy lays out the commitments made by IPSIA and informs staff and associated personnel of their responsibilities in relation to safeguarding.

IPSIA's representatives must demonstrate the highest standards of behaviour and conduct both in their private and professional lives, 24 hours a day and 7 days a week.

This means that every single concern is fully responded to and where necessary prompt action (including investigating and taking disciplinary action, if applicable) is taken and it means that each representative is subjected to the same processes as everyone else, regardless of their position or reputation within the organization.

This policy is mandatory and must be applied in all situations where IPSIA and our partners work.

What is safeguarding?

Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur.
In our sector, we often use this to apply to the safety and welfare of people involved in the delivery or receipt of humanitarian aid and development assistance.

Scope

- all IPSIA staff working in offices in Italy and abroad
- Associated personnel whilst engaged with work or visits related to IPSIA, in offices in Italy and abroad, including but not limited to the following: consultants; volunteers; contractors; donors; programme visitors including journalists, photographers…

Policy Statement

IPSIA believes that everyone we come into contact with, either in person or through our digital channels, regardless of age, gender, disability or ethnic origin has the right to be protected from all forms of harm,

abuse, neglect and exploitation. IPSIA will not tolerate abuse and exploitation by staff or associated personnel.
This policy will address the following areas of safeguarding: child safeguarding, adult safeguarding. Related to protection from sexual exploitation and abuse IPSIA already has a specific policy and procedures associated with. Connected to SG policy IPSIA has also a solid Code of Ethics and the Code of Conduct.

IPSIA is committed to addressing safeguarding throughout its work, through the three pillars of: **prevention, reporting and response.**

Prevention:

IPSIA responsibilities

IPSIA will:
- Ensure all staff have access to and know their responsibilities within this policy
- Ensure all staff understand and sign up to this policy but also IPSIA's Code of Ethics and Code of Conduct
- Implement Safe Recruitment procedures for all staff and volunteers, including mandatory criminal record checks (police clearance) for those working directly with children and vulnerable adults
- Design and undertake all its programmes and activities in a way that protects people from any risk of harm that may arise from their coming into contact with IPSIA either in person or through our digital channels. This includes the way in which information about individuals in our programmes is gathered and communicated
- Ensure staff receive training on safeguarding at a level commensurate with their role in the organization
- Follow up on reports of safeguarding concerns promptly and according to due process
- Where organisation is using images of beneficiaries in their external communications – both online and offline – they should have clear processes in place to ensure the dignity, privacy, and consent of those involved.

Child safeguarding
IPSIA staff and associated personnel must not:
- Engage in sexual activity with anyone under the age of 18
- Sexually abuse or exploit children
- Subject a child to physical, emotional or psychological abuse, or neglect – either in person or online
- Engage in any commercially exploitative activities with children including child labour or trafficking

Adult safeguarding
IPSIA staff and associated personnel must not:
- Sexually abuse or exploit at-risk adults
- Subject an at-risk adult to physical, emotional or psychological abuse, or neglect – either in person or on-line

Protection from sexual exploitation and abuse
IPSIA staff and associated personnel must not:
- Exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance – either in person or on-line
- Engage in any sexual relationships with beneficiaries of assistance, since they are based on inherently unequal power dynamics

Additionally, IPSIA staff and associated personnel are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy, both on IPSIA's online platforms/channels and in person
- Report any concerns or suspicions regarding safeguarding violations by an IPSIA staff member or associated personnel or partner organization, to the appropriate staff member

Reporting:

IPSIA will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the communities we work with.
Any staff reporting concerns or complaints will be protected by IPSIA.
Staff must keep all information about any suspected or reported incidents strictly confidential and must divulge only that information to the Director, for staff and activities in Italy, to the IPSIA Country Representatives, for staff and activities abroad. Director and IPSIA Country Representatives act as the main Child Protection Officers (CPO), responsible for ensuring the implementation of this policy and acting as the primary points of contact for safeguarding concerns.
IPSIA will also accept complaints from external sources such as digital users, partners and official bodies.
It is not the responsibility of staff to decide whether abuse has taken place. All staff, however, have a mandatory duty to report any concerns – even where these are vague and are only a suspicion or 'intuition' that something is not right.
No staff member can agree to keep information regarding actual or suspected abuse 'private' as a personal confidence.

IPSIA is not an investigative authority, and appropriate referrals will be made to relevant social welfare/statutory and law enforcement agencies. IPSIA coordinates with the local Centers for Social Welfare and relevant law enforcement agencies for all external referrals concerning child protection cases, as per specific legislation of States where IPSIA operates.

How to report a safeguarding concern:
Staff members who have a complaint or concern relating to safeguarding should report it immediately to their coordinator.
If the abroad staff member does not feel comfortable reporting to their responsible (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they may report to any other appropriate staff member or the Board of IPSIA in Italy.

The person that will report will be also invited to fill the document: Critical Incidents Reporting that will become part of the investigating material (see annex).

Digital users, partners, official bodies and other external individuals can report a concern by voice or by emailing to ipsia@acli.it or to the specific address of offices abroad.

Response

IPSIA will follow up safeguarding reports and concerns according both to internal procedures both on local and international laws.
IPSIA will apply immediately appropriate disciplinary measures to staff found in breach of policy. Where an allegation of safeguarding is made against a staff member, the person will be suspended from duty on full salary. Any suspension must be with pay, unless the contract of employment allows suspension without pay, and any period of suspension should be as short as possible.
The suspension will last for up to six months, but should an investigation take longer, half the normal salary will then be paid.
Whilst suspended, the individual will not be allowed to be in contact with any other professional or IPSIA member, apart from those carrying out the investigation, or any person who is carrying out work on behalf of the organization.

If reporting is about a volunteer, he will interrupt his relationship with IPSIA starting immediately.

A committee of IPSIA will investigate all complaints of alleged or suspected abuse fully. The investigation will be conducted in a discrete and timely manner and will involve the collation of evidence typically derived from witness statements and audio/video material, chat, mail where possible.
Where required IPSIA can decide to inform the police and relevant authorities of allegations under investigation.

IPSIA will offer support to survivors of harm caused by staff or associated personnel, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding support will be led by the survivor.

Confidentiality
It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need-to-know basis only and should be kept secure at all times.

Associated policies
Code of Ethics
SEAH policy

Implementation and Review
This Safeguarding Policy has been approved on 22.02.2022 and will be reviewed at least annually.
IPSIA's foreign offices may customise this document only in terms of contacts, relevant public offices and local legislative references.

Rev.4 – Done at Rome on 09.02.2026

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PREVENTION OF CHILD SAFEGUARDING INCIDENTS - SUMMARY OF KEY PROCEDURES

1. All partners must conduct Risk Assessments for all programming and activities involving children or those having a direct impact on children. All programs - from design, until exit - will need to meet the standards for safeguarding children.

2. Where possible and practical, follow the "Two-Adult Rule," wherein two or more adults supervise all activities where children are involved and are present at all times, shall be followed. Where not possible, staff will be required to proactively plan and implement steps to mitigate the risk of not having two adults present.

3. Representatives must never:

- act in ways that may be abusive or place Children at risk of abuse,
- hit, physically assault, or physically abuse Children or threaten to do so,
- engage in behaviors that are physically inappropriate or sexually provocative.,
- engage in sexual activity or have a sexual relationship with anyone under the age of 18 years irrespective of the age of majority/consent or local custom,
- stay alone overnight with one or more Children who are not part of their family, whether in their house, project premises or elsewhere,
- sleep in the same bed with a Child engaged in IPSIA programming/activity or sleep in the same room as the Child, who is not a part of their family,
- exchange personal contact information with minors
- or ask for Children's personal information
- develop relationships with Children which could in any way be deemed exploitative or abusive,
- use language, make suggestions, or offer advice to Children which is inappropriate, offensive or abusive.
- do things for participating Children of a personal nature that they can do themselves (e.g., toileting, dressing, feeding, washing, etc.),
- condone or participate in behavior of Children which is unsafe or illegal,
- act in ways that shame; humiliate; belittle; or degrade Children, or otherwise perpetrate any form of emotional abuse,
- discriminate against, show unfair preferential or differential treatment towards certain Children engaged in IPSIA programming/activity to the exclusion of others,
- ask to meet Children away from other adults or spend excessive time alone with Child engaged in IPSIA programming/activity away from others in a manner which could be interpreted as inappropriate;
- expose Children to inappropriate images, films, music, and websites including mature content, indecent images (pornography) and violence
- The use of personal cell phones or other personal recording devices must be communicated to IPSIA and all the images/video/photography taken must ensure the child's safety and protect children's dignity. Consent forms signed by parents, tutors or caretakers which allow IPSIA and partners to acquire images, film, artwork and stories from/about children are extremely recommended.

Glossary of Terms

<u>At-risk adult</u>
Sometimes also referred to as vulnerable adult. A person who is or may be in need of care by reason of mental or other disability, gender, sexual orientation, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

Beneficiary of Assistance
Someone who directly receives goods or services from IPSIA's programmes – this includes people we engage with online through all available channels and platforms.

Child
A person below the age of 18.

Child Exploitation
Exploitation is the actual or attempted abuse of a position of vulnerability, power differential, or trust for the benefit of the individual leveraging their position, power, privilege, or wealth (through enticement, manipulation, coercion, or trickery) to engage a child in labor, domestic servitude, forced criminality, soldiering or organ harvesting, or in activity in which a child's dignity is compromised in order for an organization to gain financially or in reputation. Typically, the person(s) exploiting a child does so to profit monetarily, socially, or politically. It can happen to one or a group of a children, in the community of origin, outside of the community, or internationally.

The exploitation of a child may include but is not limited to:

- domestic servitude (e.g., cleaning, childcare, cooking, etc.)
- taking photos of children in distress or extreme states of malnourishment to gain donations.
- forced labor (commonly in factories or agriculture)
- forced criminal activities such as pickpocketing, begging, transporting drugs, manufacturing drugs, selling pirated merchandise.
- Using children for benefit fraud.
- Forcing a child to become a child soldier or join a gang

Emotional Abuse
Emotional abuse involves doing harm to a emotional, intellectual, mental, or psychological development. This may occur as an isolated event or on an ongoing basis. Emotional abuse includes but is not limited to any humiliating or degrading treatment (e.g., bad name calling, threats, yelling/screaming/cursing, teasing, constant criticism, belittling, persistent shaming etc.); failure to meet emotional needs; rejecting, ignoring

Harm
Psychological, physical and any other infringement of an individual's rights.

Psychological harm
Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation.

Protection from Sexual Exploitation and Abuse (PSEA)
The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by staff or associated personnel. The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13).

Safeguarding
Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur. In our sector, we often use this to apply to the safety and welfare of people involved in the delivery or receipt of humanitarian aid and development assistance.

Sexual abuse

The term 'sexual abuse' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual exploitation

The term 'sexual exploitation' means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

Survivor

The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive, however it is the individual's choice how they wish to identify themselves.

ANNEX - CRITICAL INCIDENTS REPORTING

This form can be used to report critical events that you have been seen or that have been reported to you.

1. Name and Surname, contact (mail, phone…)
2. Direct witness of the incident - YES/NO
3. Date and time of incident
4. Location of incident
5. Persons involved in the incident (victim/assaulter/witnesses…)
6. Brief, factual description of incident
7. Harm caused, if any
8. Name and contact details of any witnesses
9. Action taken at the time