



CHILD POLICY PROTECTION

*Approved by BiPart in April 2025
Signed by Stefano Stortone (CEO)*



1. Introduction

BiPart is a social enterprise engaged in the research, design, and implementation of participatory budgeting and democratic innovation processes, using deliberative techniques and civic digital technologies.

Its mission is to promote inclusive forms of democratic governance and decision-making in organizational and community contexts (such as municipalities, schools, prisons, associations, and companies), strengthening the deliberative, self-organizational, and cooperative capacities of those involved.

BiPart achieves its goals through awareness-raising events, educational pathways (in schools through ASL projects and in universities through seminars, courses, and role-playing sessions such as Empaville), research activities, and primarily through consultancy and the facilitation of real-world processes supported by its proprietary software platform (desktop and mobile versions).

Building on the Participatory Budgeting model, BiPart has developed a methodology and corresponding software that promotes:

- the emergence and dissemination of issues and ideas from the community;
- the aggregation of people around common topics;
- collective efforts to find new and inclusive proposals;
- collaboration between experts and citizens in co-designing innovative projects.

Across all its activities — from social agriculture to urban regeneration — BiPart prioritizes the empowerment of participants, especially disadvantaged individuals, and the sustainability of projects and participatory processes.

Governance

BiPart's methodological approach is relational-systemic, inspired by the original Participatory Budgeting model of Porto Alegre, reinterpreted with innovative elements. It is applied across various contexts and territorial networks and enables the construction of virtuous relationships and mutual trust:

- among citizens, to foster awareness of shared needs;
- between citizens and public administrations, for collaborative management of common goods;
- among public bodies, civil society organizations, and businesses, to create a network-based system for collective benefit.

General Objectives

- Promote group dynamics to define shared intervention priorities;

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- Facilitate the flow of ideas, skills, and information;
- Empower civil society members as community facilitators;
- Establish collaborative networks and self-organization tools;
- Create inclusive and dynamic deliberative bodies.

As an organization that works directly or indirectly with minors, BiPart recognizes its legal and moral duty to protect them from all forms of abuse, neglect, and exploitation.

BiPart is committed to providing a safe and respectful environment for all children and adolescents involved in its projects, in compliance with Italian and European regulations on child protection and in line with the principles enshrined in the UN Convention on the Rights of the Child, the European Convention on Human Rights, and the Lanzarote Convention.

This Policy applies to all BiPart staff, collaborators, and anyone acting on its behalf. Child protection is a collective responsibility, and all individuals involved in BiPart's activities must be aware of and adhere to it.

BiPart's commitment is based on four core principles:

1. **Awareness:** ensuring that all staff and partners understand the risks of abuse and know their responsibilities;
2. **Prevention:** minimizing risks through clear policies, training, and best practices;
3. **Reporting:** providing accessible and confidential channels to report concerns or incidents;
4. **Response:** taking prompt action in collaboration with authorities, supporting affected children, and implementing corrective measures.

BiPart's Policy aligns with the main Italian laws (Legislative Decree 196/2003, Legislative Decree 101/2018, Law 184/1983, Law 269/1998, Law 38/2006) and the National Action Plan for the protection of children's rights.

To strengthen its safeguarding framework, BiPart regularly conducts legal and social mapping, evaluates available welfare services, and collaborates with institutional and community stakeholders to ensure effective and integrated child protection.

2. BiPart's Core Principles and Values on Child Protection

At BiPart, we believe in the inalienable rights of all individuals — freedom, dignity, and equality — including children and adolescents. We recognize the heightened vulnerability of minors, especially in the presence of intersecting factors such as socioeconomic status, gender, ethnicity, sexual orientation, and past abuse or discrimination.

We are fully committed to the safety and well-being of all children and young people. We recognize our responsibility to take all reasonable measures to prevent harm, abuse, and exploitation of minors within our organization and programs.

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While BiPart is not a child-focused organization, some of its educational activities involve minors. Therefore, BiPart is committed to upholding children's rights in all aspects of its work and to protecting children from any actions — intentional or not — that could place them at risk of harm.

BiPart actively fosters a culture and operational environment that deters and prevents actions or omissions that could endanger children. Everyone involved in BiPart's activities is expected to:

- Prioritize the voice of children and ensure that safe and inclusive spaces are created for them to express their views;
- Refrain from any activity that could result in child abuse;
- Ensure that individuals with a history of abusing children are not involved in BiPart's work.

Zero Tolerance Policy: BiPart will not tolerate any form of child abuse. Anyone working on behalf of BiPart is obligated to report any concerns or incidents of suspected abuse. Violations of this policy will result in serious disciplinary actions, including termination of contracts and legal action.

Objectives of the Child Protection Policy

The purpose of this Policy is to demonstrate BiPart's commitment to protecting children from all forms of harm, including physical, psychological, sexual abuse, neglect, and exploitation. It provides practical guidance for prevention and enhanced safeguarding in BiPart's work with minors.

This Policy aims to create an open and transparent environment where concerns about child safety can be raised and addressed fairly, always placing the best interests of the child first.

Everyone working with BiPart shares the responsibility to uphold safe environments for children. This involves integrating this Policy into the daily culture and practice of the organization by:

- **Prevention:** Raising awareness, implementing safe recruitment and training practices, and applying best practices in child protection.
- **Education:** Ensuring that all personnel are informed of their responsibilities and receive appropriate training in child protection.
- **Reporting:** Clarifying mandatory reporting obligations and processes in jurisdictions where they apply. All concerns must be reported without delay.
- **Response:** Acting swiftly to protect and support children when concerns arise, including cooperating with authorities, investigating incidents, and taking corrective action.

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Policy Framework This Policy is guided by the principles of the UN Convention on the Rights of the Child, which affirms every child's right to safety, dignity, development, and participation. BiPart ensures that children involved in its projects:

- Are valued, respected, and understood within their cultural, religious, and ethnic context;
- Have the right to express their opinions and to be heard in decisions that affect them;
- Are supported in reaching their full potential in a safe and empowering environment.

A Non-Negotiable Duty We believe that organizations working with or for children have an absolute obligation to protect them from abuse. This duty is non-negotiable and fundamental to the ethical functioning of any organization in contact with children.

Open Environment BiPart fosters an organizational culture where child protection concerns are openly discussed among staff and with children themselves. This helps to:

- Prevent abuse and misconduct;
- Promote transparent communication;
- Detect potential threats and take consistent, fair action.

Child Participation BiPart integrates meaningful, safe, and inclusive child participation, guided by nine key requirements:

1. Transparent and informative participation;
2. Voluntary involvement;
3. Respectful engagement;
4. Relevance to children's lives;
5. Child-friendly methods and language;
6. Inclusive of all children;
7. Supported by adequate training;
8. Safe and risk-sensitive environments;
9. Accountability and feedback mechanisms.

3. Definitions and Key Terms

To ensure clarity and consistency across all safeguarding practices, BiPart adopts the following definitions:

Child: Any individual under the age of 18, regardless of local definitions of adulthood. This aligns with the UN Convention on the Rights of the Child and BiPart's rights-based safeguarding approach. Even if a person under 18 has reached the age of consent, voting, or majority, they are still considered a child under this policy.

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Child Abuse: Any form of physical, emotional, or sexual mistreatment, neglect, or exploitation that 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.

The main categories of abuse as defined by the World Health Organization include:

- **Physical Abuse:** Hitting, slapping, shaking, burning, or any physical aggression against a child.
- **Sexual Abuse:** Any sexual activity with a child under the age of 18, whether by force, coercion, or manipulation, including grooming or online abuse.
- **Emotional Abuse:** Threats, humiliation, isolation, or any verbal or psychological behavior that undermines a child's sense of self-worth.
- **Neglect:** Failure to provide for a child's basic needs, including education, food, shelter, emotional support, and medical care. Neglect can be as harmful as physical abuse due to a child's reliance on adults.

It is common for a child to experience more than one form of abuse over time.

Sexual Exploitation: Actual or attempted abuse of a position of vulnerability or power for sexual purposes, including but not limited to profiting financially, socially, or politically from the sexual exploitation of a child.

Examples include forced transactional sex, sexual harassment, non-consensual photography, or the dissemination of sexually transmitted infections.

Key Related Terms:

- **Adolescent:** Individuals aged 10–19.
- **Child Marriage:** Any marriage or informal union involving someone under 18.
- **Child Protection:** Activities aimed at preventing and responding to violence, exploitation, and abuse against children.
- **Child Safeguarding:** Actions taken to promote children's welfare and protect them from harm.
- **Online Exploitation:** The commercial or non-commercial use of a child's image or personal data via digital platforms.
- **Female Genital Mutilation (FGM):** The partial or total removal of the external female genitalia for non-medical reasons.
- **Forced Marriage:** Marriage where one or both parties have not freely consented.
- **Gender-Based Violence (GBV):** Harmful acts based on socially ascribed gender differences.
- **Grooming:** When an individual builds a relationship with a child to abuse or exploit them.
- **Modern Slavery:** Situations where individuals are controlled as property.
- **Transactional Sex:** Exchange of money, goods, or services for sexual acts.
- **Youth:** Individuals aged 15–24.

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Organizational Code:

- BiPart prohibits any form of abusive, exploitative, or harmful behavior by staff or representatives toward children.
- Engaging in any sexual activity with children (under 18) is strictly forbidden, regardless of perceived consent or mistaken age.
- All BiPart representatives must ensure the integration of safeguarding and the SHEA (Sexual Harassment, Exploitation, and Abuse) framework across all work areas.

These definitions serve as the foundation for all safeguarding policies and procedures implemented by BiPart.

4. The Need for a Child Protection Policy

“All organizations and professionals working with or in contact with children are required to ensure that their operations are ‘child-safe’ and thus must have a Child Protection Policy.”
(Keeping Children Safe: Child Safeguarding Standards and How to Implement Them)

BiPart requires a Child Protection Policy for the following key reasons:

To protect staff and associates

According to the UN Convention on the Rights of the Child, all children have the right to be free from all forms of violence, abuse, and exploitation. BiPart is responsible for ensuring that all its programs, policies, and operations are safe for children. This includes ensuring that staff and partners do not pose any risk to children, and that activities are designed to promote their protection.

To protect children

Some children, especially those in vulnerable circumstances, are at increased risk of abuse, exploitation, or mistreatment by caregivers, project staff, or others with access to their personal information. Many of these children may already have experienced broken trust or abuse in past adult-child relationships.

To protect the organization and its reputation

Organizations working with vulnerable children remain at risk of both actual and alleged abuse. Without appropriate child protection policies and procedures in place, these organizations are more susceptible to both genuine and false accusations.

Such allegations — founded or unfounded — can significantly damage an organization’s reputation, impede fundraising efforts, hinder mission delivery, and harm the credibility of the broader child rights sector.

A robust child protection policy, therefore, not only safeguards the rights of the child but also protects staff and the organization itself from potential harm and liability.

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5. Scope of the Child Protection Policy

BiPart's Child Protection Policy applies to:

- All BiPart staff, Board members, interns, and volunteers;
- All individuals acting on behalf of BiPart, including trainers, facilitators, and consultants;
- All adults accompanying children during BiPart-organized events and activities;
- All participants in BiPart events involving minors, including journalists, sponsors, donors, and policymakers.

All individuals listed above must read the BiPart Child Protection Policy and sign a commitment to uphold its principles and procedures.

Internal Awareness

For effective implementation, it is essential that this Policy is fully understood by everyone it applies to. BiPart ensures that all staff, interns, volunteers, collaborators, and consultants are informed about the Policy and act in accordance with its provisions, taking all necessary steps to avoid causing harm to children they may encounter during or outside of work.

The designated Child Participation Coordinator is responsible for ensuring that a copy of the Policy is shared with any organizations arranging meetings on behalf of BiPart or attending BiPart events with minors. These organizations must inform their personnel, legal guardians, and children of their rights and the reporting mechanisms available. When organizing meetings involving minors, they are also required to complete a local child protection risk mapping.

Engagement with External Partners

This Policy also applies to external partners collaborating with BiPart on activities or projects involving minors. To ensure the highest standards of child protection, external partners must:

- Sign a statement committing to BiPart's Child Protection Policy, or provide documentation demonstrating that their own safeguarding framework aligns with BiPart's standards;
- Participate in a child safeguarding briefing session before any activities involving children;
- Ensure their staff adhere to the behavioral expectations outlined in BiPart's Code of Conduct.

Any partner organizing events with children alongside BiPart, such as in EU-funded projects, must either provide evidence of their child protection policy or agree to comply with BiPart's policy.

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6. Risk Assessment and Safe Program Design

BiPart is committed to designing and delivering programs that are safe for children. Risk assessments are an essential part of project and activity planning, and child safety strategies are integrated into all stages of program development and implementation.

Risk Mitigation Strategies

Risk mitigation strategies are continually developed and refined to minimize potential harm to children. These strategies are embedded in the design, execution, and evaluation of any program, operation, or activity involving or impacting minors.

Risk Assessment Process

To safeguard children's wellbeing, BiPart implements a comprehensive and systematic risk assessment process both prior to and during program implementation. This process complements BiPart's broader project management risk assessments and aims to proactively prevent harm and create a safe environment for all minors.

Key Principles of Risk Assessment

- **Child-Centered Approach:** All risk assessments prioritize the safety, rights, and best interests of the child, in line with international child protection standards.
- **Preventive Measures:** Risks are identified and addressed before activities begin, reducing the likelihood of harm.
- **Ongoing Monitoring:** Risk assessments are not one-time actions; they are regularly reviewed and updated to respond to emerging threats.
- **Participation and Awareness:** Staff, volunteers, children, and stakeholders are encouraged to contribute to risk identification and mitigation strategies.

Stages of the Risk Assessment Process

1. **Identification of Potential Risks:**
 - Physical, emotional, and psychological risks children may be exposed to;
 - Risks related to the environment, activity format, and interactions with adults or peers;
 - Specific risks related to online safety and digital communications.
2. **Risk Evaluation:**
 - Assess the likelihood and potential impact of each identified risk;
 - Determine the vulnerability levels of the children involved.
3. **Implementation of Control Measures:**
 - Develop and enforce policies, procedures, and guidelines to minimize risks;
 - Ensure appropriate supervision, safe environments, and healthy adult-child ratios;
 - Provide child protection training to staff and volunteers.

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4. Monitoring and Review:

- Conduct regular reviews of risk assessments to identify new threats or areas needing improvement;
- Document findings and adjust policies and procedures accordingly;
- Encourage open communication to report emerging risks or concerns.

By maintaining a robust risk assessment framework, BiPart ensures that all children are protected from harm and that their wellbeing is safeguarded at all times.

7. BiPart's Child Protection Policy

Staff and Representatives

As a condition of engagement with BiPart, all staff, Board members, interns, volunteers, collaborators, and individuals acting on behalf of BiPart must:

- Acknowledge and commit to BiPart's Child Protection Policy and Code of Conduct by signing a formal declaration;
- Be recruited based on clear job descriptions that include responsibilities related to child safeguarding;
- Participate in interviews that include discussions on safeguarding knowledge and attitudes;
- Undergo reference checks and provide a criminal record certificate from the Italian Ministry of Justice for roles involving contact with minors.

No individual with a history of child abuse or exploitation will be permitted to work with BiPart.

Training and Education

Education is essential to implementing this Policy. BiPart ensures that:

- All staff, volunteers, and interns receive an introduction to the Child Protection Policy within three weeks of joining, led by the Child Protection Focal Point (CPF);
- Training includes behavioral guidelines, acceptable vs. unacceptable information sharing, and how to identify support resources for children and families;
- Regular safeguarding training is provided to all BiPart personnel, aligned with national and regional protocols, including the National Framework Protocol and relevant regional child protection procedures.

Behavioral Protocols

Anyone interacting directly with children must adhere to BiPart's Code of Conduct. This includes maintaining appropriate physical contact, communication, and digital interactions. Any breach will result in immediate disciplinary action.

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Governance and Management

The Board of Directors holds overall responsibility for policy implementation. A designated Child Protection Focal Point (CPF) will:

- Promote awareness and compliance across the organization;
- Monitor implementation and report progress to the Board;
- Develop safeguarding training resources and stay informed of best practices and legal requirements;
- Act as the main support resource for staff on child safeguarding matters.

Access to sensitive child-related information is restricted to individuals with a direct need to know. Specific procedures and checklists are included in the policy's implementation strategy, such as reporting protocols and monitoring tools.

Safeguarding considerations will be incorporated into the development of all BiPart projects, including EU-funded initiatives.

8. BiPart's Code of Conduct for Child Protection

BiPart is committed to protecting children from abuse and exploitation and will take all necessary measures to prevent and respond to incidents involving minors. All reports of actual or suspected abuse will be addressed in accordance with this Policy, regardless of the nature of the report, who is involved, or where it originates.

This Code of Conduct outlines the ethical and appropriate behavior expected from adults towards children, as well as expectations for peer-to-peer interactions among children. It is based on the best interests of the child and should be interpreted with transparency and sound judgment. BiPart aims to ensure the safe and positive participation of everyone — both children and adults — in its activities.

DO:

- Be aware of what constitutes child abuse and exploitation and understand this Policy's provisions;
- Know who the Child Protection Focal Point (CPF) is and how to contact them;
- Recognize signs of abuse and report any suspicion to the CPF immediately;
- Respect authority lines and follow established reporting procedures;
- Act fairly, honestly, and respectfully, treating everyone with dignity;
- Treat all children equally and inclusively, without discrimination;
- Maintain high personal and professional conduct standards;
- Safeguard the health, dignity, and safety of oneself and others;
- Be mindful of high-risk situations (e.g., unsupervised interactions between older and younger children);
- Recognize the potential for peer-to-peer abuse (e.g., bullying);

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- Ensure that behavior and communication are appropriate and respectful;
- Establish special measures to protect younger or more vulnerable children;
- Foster a supportive environment for children’s holistic development;
- Encourage and respect children’s voices and opinions;
- Restrict access to inappropriate digital content;
- Always maintain confidentiality of children's personal information;
- Obtain written consent from both the child and their parent/guardian for photos, videos, or sharing personal data;
- Ensure two adults are present during meetings with children whenever possible;
- Confirm that venues are accessible for children with disabilities and understand any specific equipment needs in advance;
- Ensure that child chaperones are at least 21 years old unless otherwise pre-approved;
- Obtain parental/guardian consent for overnight stays and room-sharing arrangements involving children.

DO NOT:

- Engage in any form of sexual activity with minors;
- Behave inappropriately or provocatively toward children;
- Allow children to sleep in your room or bed;
- Perform tasks for children that they can do themselves (e.g., dressing, bathing);
- Discriminate against, humiliate, ridicule, or degrade children;
- Use physical punishment or aggressive behavior;
- Allow others to violate this Code;
- Be alone with a child in situations that could raise concerns;
- Allow sexually suggestive play among children;
- Initiate inappropriate physical contact (e.g., hugs, handholding) without consent or cultural sensitivity;
- Suggest or encourage inappropriate relationships with children;
- Take photos, film, or collect personal data without official purpose and consent;
- Use children’s contact details for non-BiPart-related purposes (including social media);
- Invite children into your personal home or accommodation;
- Show favoritism through gifts or special treatment;
- Fail to report any suspected abuse, inappropriate conduct, or concerning situations to the CPF.

Strict compliance with this Code of Conduct is required. Violations will lead to immediate disciplinary action, including termination of contracts and possible legal consequences.

8. Implementation Strategy: Reporting Procedures

All staff, volunteers, and interns must be vigilant for signs that may indicate a child is in need of help. Deciding whether to report can be a difficult responsibility. The reporting procedure is

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made widely available to ensure everyone knows the steps to take regarding the safety of children and other witnesses.

BiPart is committed to fostering a culture of openness in which children feel safe to express concerns. Staff and volunteers are encouraged to:

- Maintain visible and open interactions with children and avoid isolated, unsupervised situations.
- Encourage children to talk about their experiences and provide safe spaces for them to express concerns.
- Regularly inform children of their rights and the available mechanisms for reporting issues.

Any violations of BiPart's Child Protection Policy, whether witnessed, suspected, or alleged, must be immediately reported to the Child Protection Focal Point (CPF) using the safeguarding reporting form. The guiding principle here is that the child's safety is always the primary consideration. If the complaint concerns the CPF, it should be reported to the Executive Director.

In meetings and activities where children are directly involved, they will be informed about BiPart's safeguarding policy, the code of conduct, the existence of the child protection focal point, and the complaint mechanism in an age-appropriate manner. An important step is deciding whether the concerns are internal to the organization or related to an external situation.

If the concern is internal:

Regarding staff, volunteer, or intern behavior, it must be considered whether reporting to local or national authorities is necessary. If not, the internal safeguarding procedure must be followed. If yes, the relevant authorities should be notified, and the actions taken by the authorities should be followed, including deciding on further responses and documenting the case and actions taken.

If the concern is external:

If the concern involves abuse outside the organization, it must be considered whether the issue relates to how the organization is conducting the activity and then decide whether reporting to local or national authorities is necessary. Afterward, the same procedure applies as for internal concerns.

The CPF will:

- Act on concerns or allegations confidentially in line with the standardized process developed by BiPart, in the best interests of the child, regardless of the nature of the

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report, who the allegations concern, who the reporter is, or where it originates.

- Take appropriate measures to protect the child(ren) involved from further harm during and after an incident or allegation.
- Immediately offer an assessment of the specific support and assistance needed for the affected child(ren), which may include arranging a medical assessment.
- Ensure that relevant contact details for child protection services, local services, the police, emergency medical help, and helplines are easily accessible.
- Be responsible for contacting the child's family (or guardian) and informing them of the incident and the assistance provided.
- Complete a safeguarding report to document the incident's details.
- The "best interest of the child" will be considered throughout the process.

BiPart will ensure coordination with the relevant Italian authorities for child protection, including collaboration with the National Observatory for Children and Adolescents, the Children's Ombudsman, and the Ministry of Family Affairs' child protection services. In cases requiring law enforcement intervention, reports will be made to the specialized units of the Carabinieri and the State Police.

To strengthen child protection mechanisms, BiPart will integrate national reporting channels such as Telefono Azzurro (Help Line 19696) and the European Child Helpline (116 111). Additionally, suspected abuse cases will be reported to Social Services and, where applicable, to the Public Prosecutor's Office at the Juvenile Court. All staff members must be aware of these channels and integrate them into their safeguarding responsibilities.

Implementation Strategy: Internal Safeguarding Procedure

BiPart will immediately suspend any employee, volunteer, intern, board member, consultant, or advisor accused of violating the Child Protection Policy while awaiting the outcome of the investigation. BiPart reserves the right to take any disciplinary action against the above individuals if they are found guilty in an investigation, which may include reporting the incident to the police.

The investigation completed by the Executive Director will be presented to the appointed Board Member, who will decide on the action to be taken. Any decisions from the investigation will be confirmed in writing to the concerned individual.

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Criminal acts will be reported to the police and/or Social Services in Italy and may result in a criminal investigation and conviction.

When investigating concerns or complaints, the process must always be fair, and when complaints are upheld, the individual has the right to appeal the decision. In such cases, the individual must write to the Executive Director within one week of receiving written confirmation of the complaint's outcome, explaining the grounds for the appeal.

The Executive Director will consider the appeal, including reviewing the evidence and reports, and may conduct interviews with staff and others involved. The Executive Director will reach a final decision, which will be confirmed in writing. The decision of the appeal process is final.

9. Guidelines for Communication and Media

This section of the Child Protection Policy outlines the principles that BiPart follows when communicating externally about our work and the work of our members. It includes general principles to ensure that children are kept safe at all times, as well as specific guidelines to be followed by BiPart staff, photographers, film crews, and journalists visiting BiPart events and activities. Different countries may have specific laws, protocols, or cultural norms that should be understood and respected, where appropriate. All child protection measures in the Child Protection Policy are equally applicable to BiPart's media and communication activities, including the use of social media.

To ensure that all children are protected in all situations, it is important to obtain written consent from the parent/guardian or legal guardian of minors, explicitly stating whether they agree to photos or statements of the minors being used publicly or not.

Principles

The rights and dignity of the child must be respected at all times, and the best interests of the child must remain the primary concern in our communications. BiPart will never use discriminatory or degrading language. This section provides guidelines on the use of images, films, and stories of minors for media and communication purposes to ensure data protection and safeguard the minors themselves. Abusers have sometimes targeted minors whose images they have seen in media and communication materials.

In BiPart communications about minors, the following principles will apply:

Dignity

The dignity of the child must be preserved at all times. Language should not degrade, victimize, or shame the child. In images, minors must always be appropriately dressed and should never be portrayed in poses that could be interpreted as sexually suggestive. Images of identifiable minors showing distress (e.g., in conflict zones) or involved in discussions of sensitive topics like abuse (sexual) will not be published or shared.

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Accuracy

The representation of minors must not be manipulated or sensationalized in any way. Images and stories should provide a balanced portrayal of the child's life and circumstances, balancing negative aspects with positive images showing the progress that minors are making. Communications should avoid generalizations that do not accurately reflect the nature of the situation, and images should not be taken and used out of context.

Privacy

Any information that could be used to identify a minor or put them at risk will not be used. BiPart will ensure:

- Only the minors' first names are used: care must be taken not to reveal details about where they live, their school, or other information that could lead to their residence. If necessary for the safeguarding of the minor, names will be changed.
- Information about minors' lives and photographs (including computer-stored data) will be kept in secure files. Access to these files will be limited to those who need them for their work.
- Recorded images should focus on an activity and, when possible, feature groups of minors rather than individuals.
- A wide range of minors, including various gender expressions, ages, abilities, and ethnic groups, will be represented in publications, videos, and social media, ensuring diversity in communication materials that reflect the countries and communities where BiPart operates.

Complaint Procedures:

Any complaints or concerns about inappropriate or invasive images must be reported and recorded as any other concern related to child protection.

Informed Consent and Assent

Informed consent must always be requested before taking photos, videos, or requesting personal information about the lives of minors that may be used in BiPart materials. Informed consent means that minors are informed about how BiPart may use their information or image/footage and that they are under no obligation to agree to its use. They must also be reassured that locations and other identifying information that could lead to their residence will be altered. It will be necessary to ask them if they consent to sharing their first name with the information or image/footage.

Consent must be obtained by completing and signing the appropriate form. Parental/guardian consent is also required, and the form must be countersigned, or, where this is not possible, by the organization working with them. Organizations working with minors should guide the consent request with minors and families, as they may feel more comfortable refusing consent when asked by someone they already know and trust.

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Consent forms will be kept in the minor's file by BiPart. Obtaining prior written consent does not mean that verbal consent is not needed at the time of taking photographs/videos/interviews. Consent can be withdrawn by the minor or the parent/guardian at any time.

Interviews with Minors

Interviewing minors requires skill, and certain basic principles must be followed to ensure their dignity and rights are respected.

- **Informed Consent:** In relation to interviews, informed consent includes explaining the topics likely to be discussed in the interview and clarifying the minor's right to withdraw their consent at any time. The interviewer should check the minor's understanding of consent at the beginning of the interview.
- **Providing Support:** During the interview, someone familiar to the minor should be present. When possible, the minor should be given the opportunity to choose who will support them during the interview.
- **Respecting the Right to Say No:** It should be clarified before the interview starts that the minor should only speak if they feel comfortable doing so and that they can stop and withdraw their consent at any time.
- **Gender:** Consider the different needs of boys, girls, and minors who do not identify with either gender and who they would feel most comfortable speaking with. Gender should be considered when deciding on topics that may be discussed.
- **Respecting the Right to Information:** If you intend to take notes or record the interview in another way, you must explain this to the minor and ask for their verbal permission to do so.

Visits from Photographers, Film Crews, Journalists, and Others

Special attention must be paid when organizing visits for external photographers, film crews, journalists, or visitors in the context of BiPart projects, activities, and publications:

- Journalists, photographers/film crews must be fully informed about BiPart's child protection policy before meeting minors who will be interviewed, photographed, or filmed. They must sign a commitment to adhere to this policy.
- Ensure that photographers and filmmakers are not allowed to spend time with or have access to minors without supervision. They must be accompanied by BiPart staff at all times.
- Minors, parents, and guardians must be informed of how the film, photo, or story will be used, and consent must be obtained for this. This is distinct from the consent given for the use of materials by BiPart or the national/local organization with which

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they are involved.

- To protect the confidentiality and privacy of minors, BiPart must be informed about how the photographer or filmmaker intends to use the images or stories. BiPart reserves the right to refuse usage if it is believed that doing so does not comply with the child protection policy and media and communication principles.
- If an image or any material is to be used by another organization, it must be credited to BiPart/Photographer's Name © with an appropriate caption.

Monitoring and Evaluation of the Child Protection Policy

The goal of monitoring and evaluating the Child Protection Policy is to learn from practical case experiences, which will help inform revisions to the policy and any changes to the Child Protection Policy.

To ensure accessibility and immediate action in case of child protection concerns, BiPart will:

- Display child safeguarding contact details, including the Child Protection Focal Person and national helplines, at all project sites and offices.
- Provide all staff, volunteers, and external partners with a reference sheet containing reporting procedures and emergency contacts.
- Regularly review and update contact details to ensure effective response mechanisms.

Regular Monitoring BiPart will regularly monitor the implementation of its Child Protection Policy and procedures. Progress, performance, and lessons learned will be reported annually by the Child Protection Focal Person to the Board of Directors and included in BiPart's annual reports. Monitoring and evaluation will be conducted by checking if the standards of the Child Protection Policy are being implemented and whether safeguards are working.

In addition to the general monitoring and evaluation of the Child Protection Policy, reactive monitoring will take place following incidents, contributing to a learning process for BiPart and, if necessary, changes to the Child Protection Policy or reporting procedures.

An internal review of the policy will be conducted every three years, and its findings will be approved by the Board of Directors. Additionally, an external evaluator will review the policy and practices.

The monitoring process will include the following elements:

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- Child protection procedures and practices will be periodically reviewed to ensure they align with the latest national and international safeguarding standards.
- Child Protection Officers (CPOs) will conduct scheduled and unscheduled audits of child protection measures at all levels of the organization.
- All staff, volunteers, and associates will undergo regular compliance checks to verify adherence to child safeguarding protocols.
- Risk assessments and incident reports will be systematically reviewed to identify trends and areas for improvement.

Impact Assessment and Evaluation An annual evaluation of the Child Protection Policy will be conducted, incorporating feedback from minors, parents, staff, and external child protection experts. Key performance indicators (KPIs) will be established to measure the effectiveness of the policy, including:

- The number of child protection training sessions conducted.
- The number and type of incidents reported.
- Response time and effectiveness in resolving reported cases.
- Staff and volunteer compliance rates.

External audits by independent child protection specialists may be conducted to provide an impartial assessment of the policy's implementation.

Reporting and Transparency A confidential and accessible reporting mechanism will be maintained to allow staff, minors, and stakeholders to report concerns about violations of the policy. The results of monitoring and evaluation activities will be documented and shared with senior leadership and relevant stakeholders to ensure accountability. An annual Child Protection Report will be published, summarizing key findings, improvements made, and future action plans to demonstrate a commitment to transparency and continuous improvement.

Continuous Improvement Based on the evaluation results, the Child Protection Policy will be updated as needed to address emerging risks, legal changes, and feedback from stakeholders. Regular training sessions will be adapted to incorporate lessons learned from monitoring activities, ensuring that all staff remain equipped with up-to-date knowledge on child safeguarding. Best practices and lessons learned will be shared within the organization and with partner entities to foster a culture of excellence in safeguarding.

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Appendix 1 - Indicators of child abuse

Below are some indicators of child abuse. These may vary depending on the context and should be considered in relation to the applicable regulations. This list is not exhaustive but serves as a guideline to help determine whether any form of child abuse or exploitation may have occurred through the use of specific project questionnaires or facilitator-led focus groups with minors conducted by BiPart.

1. Indicators of Possible Emotional Abuse

Physical indicators:

- Persistent fatigue or lack of concentration
- Frequent psychosomatic disorders (e.g., headaches, nausea, stomach pains)

2. Behavioral indicators:

- Severe developmental gaps
- Symptoms of depression, anxiety, isolation, or aggression
- Excessively compliant; overly polite; too neat and clean
- Imitating negative behaviors and language used at home during play
- Attention-seeking behavior and self-destructive actions, theft, impulsive lying
- Changes or regression in mood or behavior, particularly when a child isolates themselves or becomes excessively clingy
- Nervousness, frozen vigilance, obsessions, irrational phobias, extreme inhibition during play

3. Indicators of Possible Physical Abuse

Physical indicators:

- Unexplained bruises, cuts, burns, bites, fractures, or other injuries, especially in areas not typically exposed to falls, rough play, etc.

4. Behavioral indicators:

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- Distrust of adults or a particular individual
- Violent behavior toward other children
- Dressing inappropriately to cover bruises or other injuries
- May be extremely aggressive or extremely withdrawn
- Fails to remember how the injuries occurred or gives inconsistent explanations

5. Indicators of Possible Sexual Abuse

Physical indicators:

- Severe sleep disturbances, with fears, phobias, vivid dreams, or nightmares, sometimes with explicit or implicit sexual connotations
- Symptoms of sexually transmitted diseases or urinary infections
- Unusual or excessive itching or pain in the genital, anal, or abdominal areas

6. Behavioral indicators:

- Child being sexually provocative with adults
- Inappropriate sexual play for their age through drawings, toys, or alone with others
- Concern about sexual issues; bizarre, sophisticated, or unusual sexual knowledge
- Secretive comments and/or comments that allude to the behavior of caregivers

7. Indicators of Possible Neglect

Physical indicators:

- Malnutrition and lack of growth
- Constant hunger, stealing, or binge eating



- Untreated illnesses
- Inappropriate clothing
- Extremely dirty or unwashed
- Inadequate supervision or left alone for unacceptable periods

8. Behavioral indicators:

- Severe lack of attachment to other adults or excessive need for affection or attention
- Poor social skills in interaction with other children and adults
- Lack of understanding of basic hygiene
- Poor school attendance or performance

Important Note:

These indicators must be carefully evaluated within the specific context of the child. The presence of one or more of these signs does not necessarily mean that abuse has occurred, but it should prompt more careful observation and, if necessary, a report to BiPart's child protection responsible parties.

All BiPart staff, volunteers, and collaborators have a responsibility to report any suspicion of abuse or neglect to ensure appropriate actions are taken to protect the child's well-being.



Appendix 2 – Release for the use of personal data

FOR MINOR STUDENTS (parent's details and signature)

Parent's details:

- **Parent's full name:**

- **Parent's Tax Code:**

- **Relationship to the student:**

Student's details:

- **Student's full name:**

- **Date of birth:** _____

- **Place of birth (City):** _____

- **Province of birth:** _____

- **Date of residence:** _____

- **Place of residence (City):** _____

- **Province of residence:** _____

- **Address of residence:** _____ n.

Authorization: The undersigned, parent of the student, authorizes BiPart srls and other implementers to use any images (photos, videos) related to their child produced during the activities, exclusively for educational, documentation, promotion, and dissemination purposes of the initiative.

- **Date:** _____

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- **Parent's signature:** _____
-

Information pursuant to Article 13 of Legislative Decree 196/2003

We wish to inform you that Legislative Decree No. 196 of June 30, 2003 ("Personal Data Protection Code") provides for the protection of individuals and other subjects regarding the processing of personal data. According to the regulation, this processing will be based on the principles of fairness, lawfulness, transparency, and the protection of your privacy and rights.

Pursuant to Article 13 of Legislative Decree 196/2003, we provide the following information:

1. The data provided will be processed for the correct execution of the legal and administrative requirements necessary to implement the educational program "Sculpture Workshop: Rural Life in Stone and Wood" managed by BiPart srls in collaboration with public and private associations, societies, and entities, also to promote the enterprise's activities.
 2. The processing will be carried out using automated, computerized, and telematic tools.
 3. The provision of data is mandatory and necessary for the implementation of the educational program and its management. Failure to provide the data may compromise the realization of the initiative.
 4. The data may be communicated to public and private entities, associations, and companies involved in BiPart srls activities.
 5. The data controller is BiPart srls, located in Milan (MI), Via Metauro 4, Tax Code/ VAT Number: 09444470968.
-

Right of access to personal data (Article 7, Legislative Decree 196/2003):

- The data subject has the right to obtain confirmation of the existence or absence of personal data concerning them and to receive intelligible communication.
 - The data subject has the right to obtain the updating, correction, or deletion of data processed in violation of the law.
-

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Consent Declaration pursuant to Article 13 of Legislative Decree 196/2003

The undersigned, having received the information regarding the data processing, gives their consent to the processing, dissemination, and communication to third parties of personal data for the purposes indicated.

I consent:

I do not consent:

Date: _____

Parent's signature: _____

This form must be signed by the parent and submitted complete for student registration.

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Appendix 3 – Consent for the Publication of Images, Photographs, or Videos (Law No. 633 of April 22, 1941)

Release Statement for the Publication of Images, Names, and Voices

(EU Regulation No. 679 of 2016)

I, the undersigned _____, born in _____
 (____), on _____, **residing at** _____ (), address:
 _____, **participating in the**
activities of the project, selected by CON I BAMBINI Social Enterprise S.r.l. as part of the
 Fund for Combating Child Educational Poverty, hereby

AUTHORIZE

(ORGANIZATION NAME) _____, with its registered office at
 _____, tax code _____, phone
 _____, email address _____, to use, or transfer
 to third parties, the publication (on the internet, in print, on social media, or any other form of
 distribution) of images, photographs, or audio-video recordings made by
 _____ (ORGANIZATION NAME), on the date
/...../....., from : to, at the location of
 _____, for any purpose, whether cultural, social, promotional,
 provided and on the condition that my personal dignity and decorum are never
 compromised.

The posing for and use of images, photographs, and audio-video recordings are to be
 considered carried out free of charge.

Place and date The subject in the image or photograph

PRIVACY INFORMATION

(Under Article 13 of EU Regulation No. 679 of 2016)

In compliance with Article 13 of EU Regulation No. 679 of 2016 (the "Privacy Regulation")
 and Legislative Decree No. 196 of June 30, 2003, as amended by Legislative Decree No.
 101 of August 10, 2018 (the "Privacy Code"), where still applicable, we would like to inform
 you that for the purposes outlined in the release statement above,
 _____(ORGANIZATION NAME) collects and processes personal data
 relating to you (hereinafter, the "Data Subject").

Data Controller, Data Processing Managers, and Data Protection Officer.

_____ (ORGANIZATION NAME), with its registered office at
 _____, tax code _____, phone _____,
 email address _____

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The updated list of Data Processing Managers, if appointed, is available upon request from the Data Subject.

The contact details of the Data Protection Officer (under Article 37 of the Privacy Regulation) designated by _____(ORGANIZATION NAME) can be found at the following link: (ALTERNATIVELY, PROVIDE CONTACT DETAILS OF THE DATA PROTECTION OFFICER).

Purpose and Methods of Processing.

The personal data of the Data Subject are processed in the normal course of activities by CIB, for the following purposes:

- (i) to create and use images, photographs, and audio-video recordings, as well as publish the name of the Data Subject, for the purposes described in the release statement;
- (ii) to fulfill or require the fulfillment of specific contractual and legal obligations or to carry out specific tasks required by laws, EU regulations, or rules;
- (iii) to assert or defend a right, including in judicial proceedings, as well as in administrative proceedings or arbitration and conciliation procedures as provided by law and EU regulations.

In relation to these purposes, the processing of personal data is carried out by specifically designated subjects who are authorized and trained to process data under Article 2-quaterdecies of the Privacy Code and Article 29 of the Privacy Regulation, as well as by external subjects, who may assume the role of independent Data Controllers or be designated in writing as Data Processing Managers; in any case, processing will be carried out using manual, computer, and telematic tools, in ways strictly related to the purposes and ensuring the confidentiality and security of personal data, fully complying with the applicable laws.

Mandatory or Voluntary Nature of Data Provision, Consequences of Refusal, and Legal Basis for Processing.

Regarding the purposes outlined above, the provision of personal data by the Data Subject is voluntary, but failure to provide such data would make it impossible to create and use images, photographs, and audio-video recordings of the Data Subject, as well as to publish their name.

Therefore, for the purpose described in point (i) of the previous paragraph 2, the legal basis for processing is the consent of the Data Subject (under Article 6, Paragraph 1, Letter a) of the Privacy Regulation); once consent is provided for the purpose described in point (i), the legal basis for the subsequent purposes outlined in points (ii) and (iii) is the fulfillment of legal obligations to which the Data Controller is subject (under Article 6, Paragraph 1, Letter c) of the Privacy Regulation).

Who We May Share the Data With and in What Context.

In relation to the purposes of processing outlined above, and within the strictly relevant limits, the images, photographs, and audio-video recordings of the Data Subject, as well as the publication of their name, may be disseminated or published.

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Furthermore, other personal data of the Data Subject, other than those published, may or may be communicated, in Italy or within the EU, to the following subjects:

(i) Public Authorities to comply with legal obligations;

(ii) external organizations and/or companies used by _____(ORGANIZATION NAME) to perform activities related to or arising from the purposes of the release statement;

(iii) external consultants, if not designated in writing as Data Processing Managers.

Finally, the images, photographs, and audio-video recordings of the Data Subject, with explicit and separate consent, may be transferred to the non-profit organization CON I BAMBINI Social Enterprise S.r.l., as well as to institutions and media, always for non-commercial purposes and solely to promote institutional activities related to the project.

The subjects indicated above, to whom the personal data of the Data Subject will or may be communicated (since they are not designated in writing as Data Processing Managers), will process the personal data as Data Controllers under the Privacy Regulation, autonomously, being unrelated to the original processing carried out by _____(ORGANIZATION NAME).

A detailed and constantly updated list of these subjects, with their respective locations, is always available at the registered office of _____(ORGANIZATION NAME).

Personal data of the Data Subject, other than the image and voice recordings and the publication of the name, will not be subject to dissemination.

Rights of the Data Subject.

Articles 15 and following of the Privacy Regulation grant the Data Subject the right to obtain: confirmation of the existence or non-existence of personal data concerning them, even if not yet recorded, and communication of these data in an intelligible form;

indication of the origin of the personal data, the purposes and methods of processing, the logic applied in case of processing carried out with the aid of electronic tools, and the identification details of the Data Controller;

updating, correction, integration, deletion, anonymization, or blocking of data processed in violation of the law – including those that are no longer necessary to be kept in relation to the purposes for which the data were collected or subsequently processed – as well as the certification that such operations have been communicated, even with regard to their content, to those to whom the data have been disclosed or disseminated, except in cases where such fulfillment is impossible or involves a disproportionate effort in relation to the protected right.

The Data Subject also has the right:

to withdraw consent at any time (if provided) to the processing of personal data (without prejudice to the lawfulness of processing based on consent before its withdrawal);

to object, in whole or in part, for legitimate reasons, to the processing of personal data concerning them, even if relevant to the purpose of collection;

to object, in whole or in part, to the processing of personal data concerning them for the purpose of sending advertising material or direct sales or for market research or commercial

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communications;

to lodge a complaint with the Data Protection Authority in the cases provided for by the Privacy Regulation.

To exercise the rights under Articles 15 and following of the Privacy Regulation, the Data Subject, in the manner specified in Article 12 of the Privacy Regulation and within the limits specified in Article 2-undecies of the Privacy Code, can contact _____(ORGANIZATION NAME), as the Data Controller, at the contacts provided above.

Security Measures.

The personal data of the Data Subject are processed in compliance with applicable law and using appropriate security measures, in accordance with current regulations, including Articles 5 and 32 of the Privacy Regulation.

Among other things, appropriate security measures have been adopted to prevent unauthorized access, theft, disclosure, unauthorized modification, or destruction of the Data Subject's data.

Duration.

Personal data of the Data Subject, other than those published, will be retained by _____(ORGANIZATION NAME) for the period strictly necessary to achieve the purposes of the release statement, unless there is a need for longer retention in accordance with applicable law.

Having read the above information, the Data Subject:

I consent:

I do not consent:

for the publication of data for the purposes, in the manners, and to the subjects indicated in the above Privacy Notice. In the absence of consent, the data will not be published on the website or social networks of _____(NAME OF THE ORGANIZATION), or in any other form.

I consent:

I do not consent:

for the transfer of their images, photographs, and audio-video recordings to the non-profit organization BiPart Impresa sociale S.r.l., as well as to institutions and media, always for non-commercial purposes and solely for promoting the institutional activities related to the project.

Consent Declaration pursuant to Article 13 of Legislative Decree 196/2003

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The undersigned, having received the information regarding the data processing, gives their consent to the processing, dissemination, and communication to third parties of personal data for the purposes indicated.

Date: _____

Parent's signature: _____

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