

Professionisti per la Promozione e
Protezione dei Diritti Fondamentali



CHILD PROTECTION & SAFEGUARDING POLICY

VERSION 2.2

Adopted by the Board on 1 September 2026

Last updated September 2026 · Next review September 2027

Adopted in alignment with the UN Convention on the Rights of the Child, the Lanzarote Convention, Article 24 of the EU Charter of Fundamental Rights, the Keeping Children Safe Child Safeguarding Standards and the General Data Protection Regulation.

DOCUMENT CONTROL

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Approved by	Veneranda Nazzaro, President and Legal Representative
Contact for this policy	Child Protection Officer: majabova@gmail.com · General enquiries: info@theprorights.com
Applies to	All staff, volunteers, board members, consultants, interns and third parties (including consortium partners and subcontractors) engaging with children in the course of PRO RIGHTS activities, including EU-funded projects

VERSION HISTORY

VERSION	DATE	SUMMARY OF CHANGES	AUTHOR / ROLE
1.0	2025	Initial adoption of the Child Protection Policy.	PRO RIGHTS
2.0	September 2026	Full revision aligning the policy with international and EU child-safeguarding standards; governance, roles and responsibilities; risk-assessment methodology; whistleblowing procedure; external reporting contacts; incident report and risk assessment templates.	Child Protection Officer, with PRO RIGHTS Board
2.1	September 2026	Partner and third-party due diligence; references and self-disclosure in recruitment; child-accessible reporting channel; cross-border data transfer and data-breach protocol; accessibility in risk assessment.	Child Protection Officer, with PRO RIGHTS Board
2.2	September 2026	Alignment with Directive 2011/93/EU and Italian law (Legislative Decree 39/2014, Art. 2-quinquies Privacy Code, Laws 47/2017 and 71/2017); clarified legal basis for consent and introduced child assent; guidance on responding to disclosures and on allegations against staff; reporting timeframes; supervision ratios, residential and online safeguards; expanded Code of Conduct; records	Child Protection Officer, with PRO RIGHTS Board

VERSION	DATE	SUMMARY OF CHANGES	AUTHOR / ROLE
		retention schedule; updated references; new Annexes VI–VII.	

CONTENTS

1. Background
2. Introduction
3. Purpose and Scope
4. Guiding Principles and Regulatory Framework
5. Definitions
6. Types of Abuse and Harm
7. Governance, Roles and Responsibilities
8. Risk Assessment and Prevention
9. Recruitment, Vetting, Training and Code of Conduct
10. Reporting Procedures for Child Protection Concerns
11. Managing and Storing Child Protection Records
12. Confidentiality and Data Protection
13. Responding to Child Protection Concerns — Step by Step
14. Preventing Bullying and Harmful Behaviour
15. Keeping Children Safe Online
16. Photographing and Sharing Images of Children
17. Use of Data from Minors in Research, Questionnaires and Monitoring
18. Whistleblowing Procedure
19. External Reporting Contacts
20. Review and Update of Procedures
21. References and Standards
 - Annex I — General Participation and Activity Consent Form
 - Annex II — Media and Image Consent Form
 - Annex III — Data Collection and Research Consent Form
 - Annex IV — Child Protection Concern / Incident Report Form
 - Annex V — Activity Risk Assessment Template
 - Annex VI — Child-Friendly Summary of this Policy
 - Annex VII — Code of Conduct Acknowledgement Form

1 Background

Child abuse is a serious and pervasive issue affecting children and adolescents worldwide, transcending borders and cultures. It manifests in various forms, including physical, sexual and emotional abuse, as well as neglect. Children and young people are vulnerable to exploitation, abuse, violence and neglect in a range of settings — within families, communities, institutions and organisations, both in private and public spaces. Such risks can arise from many factors and may be perpetrated by individuals in trusted positions, including staff, volunteers and external partners.

To safeguard the well-being of children and adolescents involved in PRO RIGHTS activities, this Child Protection and Safeguarding Policy sets out how the organisation prevents, identifies and responds to abuse, and ensures a safe and supportive environment for all.

2 Introduction

PRO RIGHTS is a civil society organisation based in Naples, Italy, founded by academics, researchers and legal professionals committed to the promotion and protection of fundamental rights. Its mission is to strengthen awareness of, and respect for, human rights among institutions, professionals, legal and social practitioners, civil society and the business community.

The organisation conducts in-depth studies to identify potential solutions to conflicts that arise between individual and collective needs and offers support in the legal defence of individuals whose fundamental rights have been violated. A significant focus of PRO RIGHTS is on continuous education and training, as well as the promotion of specialised roles in human rights, achieved through partnerships with universities, research institutions, professional bodies and civil society organisations at local, national and supranational level.

PRO RIGHTS is dedicated to ensuring the safety and well-being of children involved in its activities, including activities carried out under EU-funded programmes and in partnership with other organisations. This policy outlines clear, practical and actionable procedures for preventing harm, ensuring a safe environment, and responding effectively to concerns about the safety and welfare of children.

3 Purpose and Scope

This policy protects children from abuse, exploitation and neglect during all activities organised or co-organised by PRO RIGHTS, including activities delivered jointly with consortium partners under EU-funded projects. It outlines the responsibilities of staff, volunteers and partners in maintaining the safety of children and provides a framework for responding to and reporting child protection concerns.

Aim

To safeguard the rights of children, prevent harm, and create a safe and supportive environment for children in all PRO RIGHTS activities, wherever those activities take place.

Scope

This policy applies to all employees, board members, volunteers, interns, consultants and any third parties who may come into contact with children as part of PRO RIGHTS activities, including workshops, consultations, training, research, online activities and community outreach. Where PRO RIGHTS acts as a partner within a wider consortium, this policy applies to PRO RIGHTS staff and volunteers and is intended to operate alongside, not in place of, the lead applicant's own safeguarding arrangements.

4 Guiding Principles and Regulatory Framework

This policy is not a stand-alone document. It reflects, and is to be read together with, the international, European and national instruments below. Its structure follows the four Keeping Children Safe standards: Policy (Sections 1–6), People (Sections 7 and 9), Procedures (Sections 8 and 10–17) and Accountability (Sections 18–20).

INSTRUMENT	LEVEL	RELEVANCE TO THIS POLICY
UN Convention on the Rights of the Child (UNCRC), 1989 — in particular Articles 3, 12, 19, 34 and 36	International	Foundational definition of the child, the best-interests principle, the right to protection from all forms of violence, exploitation and abuse, and the right to be heard.
Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse (Lanzarote Convention), 2007	Council of Europe	Reference standard for prevention, detection, reporting and response to child sexual abuse and exploitation, including recruitment and vetting of anyone working with children.
Directive 2011/93/EU on combating the sexual abuse and sexual exploitation of children and child pornography	EU	Requires that persons convicted of child sexual abuse offences can be prevented from exercising professional and organised voluntary activities involving direct and regular contact with children (Art. 10); basis of the Italian vetting obligation applied in Section 9.1.
Charter of Fundamental Rights of the European Union, Article 24	EU	Establishes that the child's best interests must be a primary consideration in all EU-related actions and that children have the right to protection and care.
EU Strategy on the Rights of the Child, COM(2021) 142	EU	Sets the policy framework that CERV, Erasmus+ and Horizon Europe actions involving children are expected to reflect.
European Commission Recommendation on developing and strengthening integrated child protection systems in the best interests of the child (April 2024)	EU	Promotes child-safe organisations, child-friendly reporting mechanisms and coordinated referral pathways, reflected in Sections 8, 10 and 19.
Keeping Children Safe – International Child Safeguarding Standards (2024 edition)	International (sector standard)	Widely used benchmark for child safeguarding, organised in four standards — Policy, People, Procedures and Accountability — referred to in CERV calls; the structure of

INSTRUMENT	LEVEL	RELEVANCE TO THIS POLICY
this policy follows these four standards.		
Regulation (EU) 2016/679 (GDPR), in particular Articles 6, 8, 9, 13 and 35	EU	Legal framework for processing children's personal data: lawful bases, the specific rule on children's consent to information society services (Art. 8), special categories of data, information notices and data protection impact assessments.
Italian Personal Data Protection Code (Legislative Decree 196/2003, as amended by Legislative Decree 101/2018), Art. 2-quinquies	National (Italy)	Sets at 14 the age from which a minor may consent to information society services in Italy and requires clear, child-friendly information; applicable national reference for records held by PRO RIGHTS.
Legislative Decree 39/2014 and Art. 25-bis of Presidential Decree 313/2002	National (Italy)	Obligation to obtain the criminal record certificate before engaging workers and organised volunteers in activities involving direct and regular contact with minors (Section 9.1).
Law 47/2017 (unaccompanied foreign minors)	National (Italy)	Role of the guardian (tutore) of unaccompanied minors, who gives the consents required by this policy in place of parents.
Law 71/2017 on cyberbullying, as amended by Law 70/2024	National (Italy)	Prevention of and response to bullying and cyberbullying (Sections 14–15).
Art. 10 Italian Civil Code and Arts. 96–97 Law 633/1941	National (Italy)	Rules on the use and publication of a person's image (Section 16, Annex II).
CERV call documents, Erasmus+ Programme Guide and Horizon Europe ethics self-assessment guidance	EU funding programmes	Requirements for organisations in direct contact with children to have a published child protection policy covering the four Keeping Children Safe standards, including vetting, reporting procedures and training, and ethics requirements for actions involving minors.
NSPCC safeguarding guidance	Sector guidance (UK)	Practice-level reference used for the descriptions of abuse indicators and response procedures in Sections 6 and 14.

Four principles run through every section of this policy: the best interests of the child are a primary consideration in every decision; every child has an equal right to protection regardless of sex, gender identity, sexual orientation, ethnicity, nationality, residence status, language, religion, disability or socio-economic background; prevention takes priority over response — the organisation aims to design activities so that risks are reduced before they materialise, not only to react well when they do; and children have the right to express their views and to be heard in all matters affecting them (Article 12 UNCRC).

5

Definitions

This section provides clear definitions of key terms used throughout this policy to ensure shared understanding among all stakeholders.

Child Any person under the age of 18 years, in accordance with the UN Convention on the Rights of the Child. For the purposes of this policy, "children" includes all minors involved in PRO RIGHTS activities, whether as participants in programmes, surveys or research.

Abuse Any action or failure to act that causes harm or potential harm to a child. Its specific forms are set out in Section 6.

Safeguarding The broad set of measures designed to prevent harm to children by ensuring that the environments in which they interact are safe, nurturing and supportive, through proactive steps taken before risks arise.

Child Protection The actions taken when there are concerns or suspicions that a child may be at risk of harm, including immediate steps to protect the child and, where necessary, reporting to the competent authorities.

Consent The voluntary, informed and documented agreement obtained before involving a child in any PRO RIGHTS activity or processing their personal data. Participation is authorised by the holder(s) of parental responsibility or by the legal guardian (for unaccompanied minors, the guardian appointed under Law 47/2017). Art. 8 GDPR and Art. 2-quinquies of the Italian Privacy Code allow a minor aged 14 or over to consent alone to information society services; as a precautionary organisational standard, PRO RIGHTS nevertheless requires, for all its activities: for children under 14, consent from a parent or legal guardian together with the child's assent; for children aged 14–17, the joint signature of the minor and of a parent or legal guardian. Where personal data are processed on a lawful basis other than consent (Section 12), the forms are accompanied by the relevant information notice. All consents are collected using the templates in Annexes I–III.

Assent The child's own agreement to take part, expressed in a way appropriate to their age and maturity after the activity has been explained in child-friendly terms. A child's refusal is respected even where a parent or guardian has consented.

Disclosure When a child tells a staff member, volunteer or other adult that they, or another child, have been harmed or are at risk of harm. How to respond to a disclosure is set out in Section 10.2.

Confidentiality Keeping information private and sharing it only with individuals who have a legitimate need to know, so that sensitive details about a child or any concern are shared only with those directly responsible for the child's safety and well-being.

Child Protection Officer (CPO) The individual designated by PRO RIGHTS to oversee implementation of this policy, act as the primary point of contact for child protection concerns, and manage the response to those concerns (see Section 7).

Data Protection The legal protections ensuring that a child's personal data is collected, stored and processed securely and appropriately, in compliance with GDPR and Italian Legislative Decree 101/2018.

Vulnerable Child A child at greater risk of harm due to circumstances such as disability, an impoverished or marginalised background, displacement or migration status, or a lack of adequate parental supervision or care.

Bullying Intentional, repeated harmful behaviour towards a child — physical, verbal, emotional or social — including cyberbullying carried out through electronic devices or social media.

Reporting The formal notification of any concern, suspicion or disclosure of abuse to the CPO or other relevant authority, ensuring concerns are investigated and addressed in a timely manner.

Whistleblowing The act of reporting misconduct, unethical behaviour or violations of safeguarding standards within the organisation, by staff, volunteers or external parties. The identity of the whistleblower is protected under Section 18.

Sensitive Data Personal information protected by law due to its nature — for example, health, political opinions or religious beliefs — (special categories of data under Art. 9 GDPR), whose processing requires a specific legal basis — normally explicit consent — and additional safeguards.

Professional Boundaries The ethical and appropriate limits that staff and volunteers must maintain when interacting with children, so that relationships remain respectful and children are not exposed to inappropriate behaviour or exploitation.

Incident Any event, situation or occurrence that raises a concern about a child's safety and well-being, whether a suspected case of abuse, neglect, bullying or an unsafe practice during activities.

Risk Assessment The process of identifying, evaluating and mitigating potential hazards to children's safety before and during an activity (see Section 8).

Safe Environment Any setting — physical or online — where children are protected from harm, abuse and neglect, including through adequate supervision of activities.

6 Types of Abuse and Harm

Child abuse encompasses various forms of harm that can significantly affect a child's well-being, development and sense of security. This section sets out the main forms of abuse, indicative signs, and why prompt action matters.

The indicators listed below are signs that may warrant attention, not proof of abuse. They must be read in context and with cultural sensitivity — clothing, family arrangements or reluctance to speak with strangers may reflect culture, religion or past experiences rather than harm — and any concern is referred to the CPO rather than investigated by the individual.

6.1 PHYSICAL ABUSE

Any intentional act that causes physical harm or injury to a child, ranging from hitting or slapping to more severe violence.

- Unexplained bruises, burns, cuts or fractures at various stages of healing
- Fear of physical contact or sudden withdrawal from physical activities
- Reluctance to go home, or a noticeable change in behaviour after returning home
- Frequent hospital visits or delayed medical treatment for injuries

6.2 EMOTIONAL OR PSYCHOLOGICAL ABUSE

A pattern of behaviour that harms a child's emotional development and self-esteem, including verbal abuse, constant criticism, rejection or threatening behaviour.

- Developmental delays, such as difficulties speaking or delayed cognitive abilities
- Extreme anxiety, low self-esteem or depression
- Behavioural changes such as aggression or extreme passivity

- Sudden withdrawal from friends, family or previously enjoyed activities

6.3 SEXUAL ABUSE

Any form of sexual activity or behaviour between an adult, or another child in a position of power, and a child, whether or not the child is fully aware of the act — including molestation, exploitation for pornographic purposes or inappropriate touching.

- Difficulty walking or sitting, or unexplained soreness in the genital or anal areas
- Sudden, unexplained behaviour changes such as withdrawal or aggression
- Knowledge of sexual behaviour inappropriate for the child's age
- Fear of a particular person, or reluctance to take part in activities with certain individuals

6.4 NEGLECT

Occurs when a child's basic needs — food, clothing, shelter, supervision, education or medical care — are not met.

- Chronic hunger or malnutrition
- Lack of adequate clothing for the weather
- Unsupervised or frequent absences from school or activities
- Untreated medical conditions or injuries; poor hygiene

6.5 BULLYING

Physical violence, verbal harassment or emotional manipulation, perpetrated by peers, siblings or adults, with lasting effects on mental health and social development.

- Unexplained injuries, or reluctance to talk about where the child was or who they were with
- Drop in school performance, social withdrawal or isolation
- Anxiety, depression or increased feelings of helplessness

6.6 EXPLOITATION

Occurs when a child is manipulated or coerced into performing activities for the benefit of others, often for financial or personal gain, including child labour, commercial sexual exploitation or use of children in illegal activities.

- Unusual spending habits or possession of items that cannot be explained
- Absence from school or regular activities due to "work" obligations
- Fear of being away from an adult, or reluctance to interact with strangers

6.7 ONLINE AND DIGITAL ABUSE

Given the growing role of digital tools in PRO RIGHTS activities (webinars, online consultations and digital platforms), online abuse — grooming, exposure to inappropriate content, non-consensual sharing of images or cyberbullying — is treated as a distinct risk category, addressed specifically in Section 15.

6.8 OTHER FORMS OF HARM

Staff and volunteers should also be alert to forms of harm that may particularly affect children in situations of vulnerability, including trafficking in human beings, female genital mutilation, child, early and forced marriage, children witnessing domestic violence, online sexual extortion (sextortion) and harmful sexual behaviour

between children. Any such concern is reported under Section 10 and, where a crime may have been committed, escalated to the competent authorities under Section 19.

7 Governance, Roles and Responsibilities

Clear accountability is a core requirement of the Keeping Children Safe Child Safeguarding Standards and of EU funding programmes. The following roles apply across all PRO RIGHTS activities.

PRO RIGHTS Board and Legal Representative

Retains overall accountability for this policy, formally adopts and reviews it, and ensures adequate resources are made available for its implementation, including training and background checks.

Child Protection Officer (CPO)

Maja Bova is the designated Child Protection Officer. The CPO is the first point of contact for any safeguarding concern, oversees implementation of this policy, maintains records under Section 11, coordinates with external authorities, and reports annually to the Board on safeguarding activity, including the number and nature of concerns raised (in anonymised form) and any resulting changes to procedures. The CPO has completed specialised child-safeguarding training and can be reached directly and confidentially at majabova@gmail.com. Valerio Maione acts as deputy CPO when the CPO is unavailable, or when the CPO has a conflict of interest in a given case; the deputy's identity and contact details are communicated to all staff and volunteers.

Staff, volunteers, interns and consultants

Responsible for reading and complying with this policy and the Code of Conduct (Section 9), completing mandatory training, and reporting any concern to the CPO without delay.

Project and consortium partners

Where PRO RIGHTS delivers activities jointly with other organisations, the partner responsible for a given activity is expected to apply either this policy or an equivalent safeguarding policy of its own; PRO RIGHTS staff remain bound by this policy regardless of which partner is leading the activity.

Due diligence on partners and third parties

Before PRO RIGHTS signs a consortium agreement or subcontract for an activity involving children, the CPO carries out a short due-diligence check on the partner or third party: confirmation that a safeguarding policy exists (or, if not, agreement to operate under this one for the activity), a named safeguarding contact on the partner's side, and, for activities classified as medium or high risk under Section 8, evidence that the partner applies equivalent vetting to its own staff and volunteers.

Consortium and subcontracting agreements for activities involving children include a safeguarding clause requiring the partner to report concerns to PRO RIGHTS without delay and allowing PRO RIGHTS to suspend or terminate the collaboration in case of a serious breach.

8 Risk Assessment and Prevention

Before any activity involving children is delivered, the activity organiser, together with the CPO, classifies the activity by risk level and applies the corresponding minimum safeguards, using the template in Annex V.

RISK LEVEL	TYPICAL ACTIVITIES	MINIMUM SAFEGUARDS
Low	One-off public events or presentations with children present alongside parents/guardians; no unsupervised contact.	Code of Conduct applies; at least two adults present, one of whom acts as safeguarding contact for the event and is familiar with this policy.
Medium	Recurring workshops, seminars or civic-education activities with direct engagement with minors in a group setting.	Two-adult supervision rule; CPO briefed in advance; consent forms (Annex I) collected; staff/volunteers trained.
High	Activities involving one-to-one contact (only where justified by the activity, in visible settings and authorised in advance by the CPO), overnight stays or travel, online one-to-one interaction, data collection from minors, or work with children in situations of heightened vulnerability (e.g. unaccompanied migrant children, children with disabilities, children in alternative care).	Criminal background checks completed; enhanced training; documented risk assessment signed off by the CPO; parental consent under Annexes I–III; ongoing monitoring.

Risk classification is reviewed whenever the nature of an activity changes materially — for example, when an activity moves online, when it begins to involve overnight stays, or when it starts to involve vulnerable or unaccompanied minors. The risk assessment also considers accessibility: whether the venue, materials and communication are suitable for children with disabilities, and whether additional support or adjustments are needed so that they can take part and raise a concern on the same terms as other children.

8.1 SUPERVISION RATIOS

Minimum adult-to-child ratios are set in each risk assessment (Annex V) according to age, needs and setting. As a baseline, PRO RIGHTS applies at least two adults for any group, and no fewer than one adult for every 10 children aged 12–17 and one adult for every 8 children under 12. Ratios are increased for residential, outdoor or high-risk activities and where children with additional support needs take part.

8.2 RESIDENTIAL, TRAVEL AND MOBILITY ACTIVITIES

- Written parental or guardian authorisation for travel and overnight stays, including emergency contacts and any information strictly needed for the child's health and safety (collected with explicit consent under Art. 9 GDPR).
- Accommodation arrangements never place an adult in a room with a child; children share rooms only with children of the same sex and similar age, unless otherwise agreed with parents or guardians (e.g. siblings).
- Mixed-gender staff teams wherever children of different genders take part.
- Adequate insurance, a written emergency plan and identified local emergency and child-protection contacts (Section 19) are in place before departure.
- Adults do not transport a single child alone in a private vehicle; transport is arranged through organised means or with at least two adults present.
- For international youth mobility, the host organisation's safeguarding contact is identified in advance and briefed on this policy.

9

Recruitment, Vetting, Training and Code of Conduct

9.1 RECRUITMENT AND VETTING

- Criminal record checks: before engaging any employee, consultant or organised volunteer in activities involving direct and regular contact with minors, PRO RIGHTS obtains the criminal record certificate required by Art. 25-bis of Presidential Decree 313/2002 (introduced by Legislative Decree 39/2014, transposing Directive 2011/93/EU). For individuals who are or have been resident abroad, an equivalent certificate from the relevant country is requested. Until the check is completed, the person has no unsupervised contact with children.
- Mandatory training: all staff, volunteers and contractors complete child protection training covering the forms of abuse, behavioural and physical indicators, and the correct steps to report a concern and respond in a way that prioritises the child's safety and well-being.
- Training records are kept by the CPO and refreshed at least every two years, or sooner if this policy is substantively revised.
- References: at least one professional reference is obtained for staff, volunteers and consultants likely to work directly with children, before they begin that role.
- Self-disclosure: candidates sign a declaration confirming whether they have any conviction, ongoing investigation or disciplinary finding relevant to child safety, in addition to the criminal background check.
- Induction: all new staff, volunteers and consultants receive a safeguarding induction and sign the Code of Conduct Acknowledgement Form (Annex VII) before taking part in any activity involving children.

9.2 CODE OF CONDUCT

- All staff and volunteers must treat children with dignity, respect and kindness.
- Positive behaviour is encouraged through praise for effort, achievement and appropriate conduct.
- Any language or behaviour that could harm or humiliate a child is strictly prohibited.
- Group activities are supervised by at least two adults (see the ratios in Section 8.1); where this is exceptionally not possible, another adult is informed and the activity takes place in an open or visible setting.
- Supervisors actively monitor children's behaviour, intervening to prevent accidents, bullying or harmful behaviour.
- Physical contact is kept to a minimum and always appropriate to the context (e.g. guiding a child's hand during an activity).
- No member of staff or volunteer is alone with a single child in a closed or private setting without another adult present or aware.
- Personal contact with children outside the scope of PRO RIGHTS activities (private messaging, social media, gifts) is not permitted.
- Physical punishment and any form of degrading or humiliating treatment are prohibited.
- No sexual, romantic or intimate relationship, and no sexualised language or behaviour, with any person under 18, regardless of the age of consent in the country where the activity takes place.
- No photographs or recordings of children on personal devices; images are taken only on organisational devices, in line with Section 16 and the consents collected.

- No alcohol, drugs or smoking during activities involving children.
- No sharing of rooms, beds or changing facilities with children; children's privacy is respected in toilets and changing areas.
- No favouritism, discrimination or unequal treatment of any child.
- Any breach of this Code, by any person, is reported to the CPO.

10 Reporting Procedures for Child Protection Concerns

Any staff member, volunteer or third party involved in PRO RIGHTS activities who has concerns about a child's safety or well-being must report those concerns without delay, and in any case within 24 hours, to the Child Protection Officer, Maja Bova (majabova@gmail.com), or to the deputy CPO. Where a child is in immediate danger, emergency services (112) are contacted first and the CPO immediately afterwards.

The report should include:

- Nature of the concern: a clear, factual description of what was observed, heard or disclosed, including whether it relates to physical abuse, emotional abuse, neglect, sexual exploitation, bullying or another type of harm.
- The child's own words, recorded as closely as possible, if a disclosure was made.
- Date and time the concern was noted, whether by observation, disclosure or suspicion.
- Actions already taken by the person reporting, such as removing the child from a potentially harmful situation or speaking to the child.

Reports must be made objectively and factually, without assumptions or judgements, using the Incident Report Form in Annex IV where practicable, so that the CPO has all relevant information to act swiftly.

The CPO acknowledges the report and carries out an initial assessment within 24 hours; where a referral to external authorities is required, it is made without delay and in any case within 48 hours. Concerns about a child are never discussed with the alleged perpetrator.

10.1 HOW CHILDREN CAN RAISE A CONCERN THEMSELVES

Children taking part in PRO RIGHTS activities are told, in simple language and at the start of the activity, who the CPO is and how to reach a trusted adult if something makes them feel unsafe or uncomfortable — in person, or through the child-friendly summary of this policy referred to in Section 20. A child does not need to use the Incident Report Form or any formal channel: telling any staff member or volunteer present is enough, and that person is responsible for passing the concern to the CPO under Section 10.

10.2 RESPONDING TO A DISCLOSURE FROM A CHILD

If a child discloses abuse or harm, the adult receiving the disclosure:

- stays calm, listens carefully and takes the child seriously;
- does not promise to keep the information secret, but explains, in words the child understands, that it must be shared with the people who can help;
- does not ask leading questions, does not investigate and does not ask the child to repeat the account to other people;

- reassures the child that telling was the right thing to do and that they are not to blame;
- does not confront the alleged perpetrator or share the information with anyone other than the CPO or deputy;
- writes down as soon as possible what the child said, in the child's own words, with date, time and setting, and passes it to the CPO under this Section.

11 Managing and Storing Child Protection Records

WHAT IS RECORDED

- Initial concern details: date, time, nature of the concern and individuals involved.
- Follow-up actions: interventions, communication with authorities, and support services provided.
- Witnesses and parties involved.
- Referrals made to external agencies, including dates and any response received.

WHO RECORDS AND HOW

The CPO or deputy is responsible for maintaining these records. Where the CPO or deputy has a conflict of interest in a case, an external or neutral party is appointed to maintain the record. All records are stored in a locked physical location or a password-protected digital system with access restricted to those with a legitimate need to know, and kept separate from general project or HR files.

Records are kept for the following minimum periods, unless a longer period is required by law or by ongoing proceedings, and are then securely destroyed: concerns relating to a child — until the child reaches 25 years of age, or for 10 years after the case is closed if longer; allegations against staff, volunteers or partners — 10 years after the case is closed; consent forms and attendance records of EU-funded activities — for the period required by the relevant grant agreement for audit purposes.

12 Confidentiality and Data Protection

All reports and responses to child protection concerns are handled with the utmost confidentiality. Information is shared only with individuals directly involved in the investigation or resolution process, including the CPO, relevant child protection services, law enforcement and, when appropriate, the child's family.

- Restricted access to information related to a concern.
- Secure record-keeping, either in a locked physical location or a password-protected digital system.
- Confidentiality for reporters: individuals who report concerns in good faith will not face retaliation, and their identity is kept confidential and disclosed only where required by law or by the competent authorities.

Where confidentiality must be breached — for example, where a child's safety is at immediate risk — the CPO informs the relevant parties of the necessity of the disclosure. All processing of personal data under this policy complies with GDPR (EU) 2016/679 and the Italian Personal Data Protection Code (Legislative Decree 196/2003, as amended by Legislative Decree 101/2018).

Lawful basis and information notices

Data needed to deliver an activity and to keep children safe are processed because the processing is necessary for the activity and to protect children (Art. 6(1)(b), (c) and (f) GDPR); consent is the lawful basis only for optional processing, such as images (Section 16), research (Section 17) and health information. Each form in Annexes I–III is accompanied by an information notice under Art. 13 GDPR, written in clear and child-friendly language, identifying the controller, purposes, lawful basis, recipients (including consortium partners, the granting authority and auditors of EU-funded projects), retention periods and data subjects' rights, including the right to lodge a complaint with the Garante per la protezione dei dati personali.

Consortium projects and impact assessment

Where PRO RIGHTS and one or more partners jointly determine the purposes and means of processing, their respective responsibilities are set out in a joint-controllership arrangement under Art. 26 GDPR, or in a data processing agreement under Art. 28 GDPR where a partner acts on PRO RIGHTS' behalf. Before any large-scale or systematic processing of children's data, in particular in research or on digital platforms, PRO RIGHTS assesses whether a data protection impact assessment under Art. 35 GDPR is required and carries it out where necessary.

Cross-border transfers

Where a minor's personal data is shared with a consortium partner established outside the European Economic Area, PRO RIGHTS ensures an appropriate transfer safeguard is in place under GDPR Articles 44–49 — such as an adequacy decision or Standard Contractual Clauses — before the transfer takes place, and keeps a record of the safeguard used.

Data breach involving a minor's data

Any suspected breach involving a child's personal data is reported to the CPO immediately. Where the breach is likely to result in a risk to the rights and freedoms of the child, PRO RIGHTS notifies the Garante per la protezione dei dati personali within 72 hours as required by GDPR Article 33, and informs the child's parent or guardian without undue delay where the breach is likely to result in a high risk to the child.

13

Responding to Child Protection Concerns — Step by Step

STEP 1 — INITIAL ASSESSMENT AND PROTECTIVE MEASURES

On the basis of the information received, the CPO assesses the severity of the situation and decides, within 24 hours, whether the concern must be referred to the competent authorities, consulting other professionals (e.g. social services, law enforcement) as needed; where a crime may have been committed, the matter is always reported. PRO RIGHTS does not investigate alleged criminal conduct and does not interview the child about the alleged abuse: any investigation is the exclusive competence of the authorities, and the child is not asked to repeat the account, to avoid further distress and to preserve evidence. Where there is doubt or an ongoing risk, the CPO implements interim protective measures, such as suspending the alleged individual from activities involving children as a neutral, precautionary measure, and ensures that the child has access to immediate medical or psychological support if necessary.

STEP 2 — COOPERATION WITH EXTERNAL AUTHORITIES

PRO RIGHTS cooperates fully with any investigation carried out by external agencies, providing documentation, witness statements and other relevant information. The CPO maintains contact with these agencies to ensure the child's welfare remains the continuing priority.

STEP 3 — ONGOING SUPPORT FOR THE CHILD

PRO RIGHTS ensures that the child is referred to appropriate specialised support services (e.g. social, psychological or health services), in coordination with the competent authorities. The child's parents or guardian are informed and involved, unless doing so could place the child at further risk — for example where the concern relates to the family — in which case the CPO first consults the competent authorities. Where possible, the child continues to take part in activities in which they feel comfortable and safe, with arrangements made to ensure they are not in contact with the alleged individual.

STEP 4 — DISCIPLINARY ACTION AND FOLLOW-UP

Where abuse or a breach of the Code of Conduct by an individual associated with PRO RIGHTS is established, the organisation takes disciplinary or contractual action proportionate to the severity of the finding, which may include termination of employment or of the contract, removal from a volunteer role or, for partners, suspension or termination of the collaboration. Where the conduct is confirmed to be criminal in nature, PRO RIGHTS ensures the matter is fully reported to law enforcement and cooperates fully with any legal proceedings. After the case is closed, PRO RIGHTS conducts an internal review to assess how it was handled and to identify improvements to safeguarding practice.

Where required by the grant agreement or the consortium agreement, PRO RIGHTS informs the project coordinator and/or the granting authority of serious safeguarding incidents occurring in EU-funded activities, without disclosing personal data beyond what is necessary.

ALLEGATIONS AGAINST STAFF, VOLUNTEERS OR PARTNERS

Allegations against a member of staff, volunteer, consultant or partner follow the same steps, with additional safeguards: the person concerned is not informed of the allegation until the CPO has consulted the competent authorities, so as not to prejudice any investigation; any suspension is a neutral precautionary measure and does not imply guilt; the person is treated fairly and given the opportunity to respond once this no longer puts the child or the investigation at risk. Where the allegation concerns the CPO, the case is handled by the deputy CPO; where it concerns the President, by the CPO, who in that case does not report to the President and, where necessary, refers the matter directly to the competent authorities.

14

Preventing Bullying and Harmful Behaviour

PRO RIGHTS has a zero-tolerance policy for bullying and harmful behaviour, and works to create an environment where children can grow and thrive without fear of intimidation or harm.

- Promoting a positive, inclusive environment that values differences and encourages collaboration.
- Conflict-resolution guidance to help children address disagreements constructively.
- Training staff to recognise early signs of bullying, including withdrawal, excessive quietness, aggression, expressions of worthlessness, or unexplained injuries.
- Immediate intervention where bullying is observed or suspected, including separating those involved and reassuring the child affected.
- All incidents or suspicions of bullying are reported to the CPO, who ensures the issue is addressed promptly, including informing parents or guardians and, where necessary, referring the matter externally.

15 Keeping Children Safe Online

PRO RIGHTS has implemented measures to protect children involved in online activities from cyberbullying, exposure to inappropriate content, or online exploitation. Consent for participation in online activities follows Section 5: under 14, consent from a parent or legal guardian together with the child's assent; 14–17, joint signature of the minor and of a parent or guardian — a precautionary standard that goes beyond the minimum age of 14 set by Art. 8 GDPR and Art. 2-quinquies of the Italian Privacy Code for information society services.

- Data protection: online platforms used in PRO RIGHTS programmes comply with data protection regulations; children's personal data is not shared without parental consent.
- Monitored interactions: all virtual spaces where children are involved (video calls, online workshops) are actively monitored by staff, with any inappropriate comment or behaviour addressed immediately.
- Parental consent: written consent is obtained before a child participates in any online activity, setting out the nature of the activity, the platform used, and any associated risks.
- Institutional accounts: sessions are hosted from PRO RIGHTS organisational accounts, never personal ones, and staff do not connect with children on personal social media or messaging apps.
- Platform settings: waiting rooms or access passwords are used, private chat between participants and between an adult and an individual child is disabled, and screen sharing is restricted to hosts.
- Recording: sessions involving children are not recorded unless specifically consented to (Annex II); children may keep their camera off.
- Age requirements: only platforms whose terms of service allow use by the age group concerned are used, and children are not asked to create accounts where this can be avoided.
- Reporting online harm: children and staff are told how to report inappropriate content or behaviour during a session; serious online incidents are reported to the Polizia Postale (Section 19).

16 Photographing and Sharing Images of Children

PRO RIGHTS is committed to protecting children's privacy in media use. Written consent is sought before taking photographs, videos or other images of children: from a parent or legal guardian for children under 14, and jointly from the minor and their parent or guardian for children aged 14–17, in line with Art. 10 of the Italian Civil Code, Arts. 96–97 of Law 633/1941 and the GDPR, using the Media and Image Consent Form (Annex II), which specifies, separately for each channel, the scope, purpose and duration of use.

Images and recordings are used only for the purposes specified in the consent form (e.g. social media, newsletters or educational resources), are not sold or used commercially, and are not shared with third parties or used for unrelated purposes without further consent. Children's names or other personal identifiers are not published alongside their images unless specifically consented to in Annex II. The child's own objection to being photographed or filmed is always respected.

17 Use of Data from Minors in Research, Questionnaires and Monitoring

When PRO RIGHTS involves minors in questionnaires, surveys, research or other data collection, data is handled securely, transparently and in full compliance with GDPR and national law. Consent follows the same rules as above, including the child's assent, and is collected using the Data Collection Consent Form (Annex III). Where required by the funding programme or by national rules, research involving minors is submitted to the competent ethics committee before data collection begins.

17.1 TYPES OF DATA COLLECTED

- Identifying information: name, age, contact details.
- Behavioural data: responses to questionnaires, participation in activities.
- Sensitive data: collected only in limited cases, with explicit consent, and handled with the highest level of confidentiality.

17.2 DATA USAGE, RIGHTS AND PROTECTION

- Encryption and restricted access for all collected data, physical or digital.
- Data retained only for the period stated in the information notice — as a rule, until the end of the project and of the related audit period — then destroyed or anonymised.
- Data is never sold, and shared with third parties only where stated in the consent form or contract, or with parental consent.
- Published results are anonymised to protect the minor's identity and privacy.
- Minors and their parents or guardians may access their data and request its rectification or deletion by contacting info@theprorights.com, subject to any legal or contractual retention obligations (e.g. audit requirements of EU-funded projects), which are explained in the information notice.

17.3 TRANSPARENCY

PRO RIGHTS clearly communicates the purpose of data collection, how data is collected and protected, and the rights of data subjects, adapting the information to the age of the minor to ensure understanding before consent is given.

If, during a survey, interview or other research activity, a child discloses harm or a risk of harm, the researcher follows Section 10: safeguarding takes priority over the confidentiality of research data, and children are told of this limit, in age-appropriate terms, before they take part.

18 Whistleblowing Procedure

Any staff member, volunteer, partner or third party who becomes aware of a breach of this policy, or of conduct that undermines its purpose — including a failure by another individual to report a concern — may raise it as a whistleblowing report.

- Reports may be made directly to the CPO or, where the concern involves the CPO, to the President and Legal Representative, in writing or in person. Concerns involving the President are made to the CPO, who in

that case does not report to the President and, where necessary, refers the matter directly to the external authorities listed in Section 19.

- The identity of the person raising the concern is kept confidential to the fullest extent possible, and no individual will face retaliation for raising a concern in good faith, even where the concern is not subsequently upheld.
- Concerns are acknowledged within 5 working days and assessed under the same procedure set out in Section 13.
- Deliberately false reports made in bad faith may be subject to disciplinary action; genuine concerns raised in good faith, even if ultimately unfounded, will never be treated as misconduct.

19 External Reporting Contacts

Where a concern needs to be escalated beyond PRO RIGHTS, or where there is an immediate risk to a child, the following bodies apply in Italy. For activities delivered abroad or with international partners, the CPO identifies and records the equivalent local contacts before the activity takes place.

BODY	ROLE	CONTACT
PRO RIGHTS Child Protection Officer (CPO)	First point of contact for any safeguarding concern raised within PRO RIGHTS activities.	Maja Bova — majabova@gmail.com
Telefono Azzurro	National Italian helpline for children's rights and safeguarding; runs the 114 Emergenza Infanzia and 19696 lines.	114 / 19696
Autorità Garante per l'Infanzia e l'Adolescenza (National Ombudsperson for Children)	National authority for the protection and promotion of children's rights in Italy.	www.garanteinfanzia.org
Polizia di Stato / Carabinieri	Immediate risk to a child's life or safety, or suspected criminal offence.	112 / 113
Polizia Postale e delle Comunicazioni	Online abuse, grooming, sextortion and non-consensual sharing of images of minors.	www.commissariatodips.it
Procura della Repubblica presso il Tribunale per i minorenni di Napoli	Judicial authority competent for reports concerning children at risk or harmed.	Official website / PEC of the Procura
Servizi sociali del Comune (Municipalità of residence)	Protection and support for children and families; referral for non-emergency concerns.	Comune di Napoli – Servizi sociali
1522 – Anti-violence and stalking helpline	Free national helpline for gender-based violence, including children who witness violence.	1522

BODY	ROLE	CONTACT
Garante per la protezione dei dati personali	Italian Data Protection Authority, for data-protection concerns involving minors' personal data.	www.garanteprivacy.it

20 Review and Update of Procedures

PRO RIGHTS recognises that safeguarding practices must evolve to meet new challenges and comply with changing regulations. This policy and its annexes — including all consent form templates, data collection procedures and reporting forms — are reviewed and updated at least annually, or whenever legal or regulatory changes occur, with changes logged in the version history in the Document Control section. Updated versions replace previous ones and are made available to all staff, volunteers and stakeholders in accessible formats.

Alongside this policy, the CPO maintains a one-page child-friendly summary (Annex VI), in Italian, English and, for transnational activities, the languages of the participating children, using plain language and simple visuals, explaining what to expect from PRO RIGHTS activities, who the CPO is, and how to raise a concern. This summary is shared with children (and, for younger children, read out or explained by a supervising adult) at the start of any activity classified as medium or high risk under Section 8.

This policy is published on the PRO RIGHTS website and shared with partners and with the parents or guardians of participating children. The CPO's annual report to the Board covers the implementation of training, vetting and risk assessments and the feedback collected from children and families after activities; children and young people are consulted, in age-appropriate ways, when this policy and its child-friendly summary are reviewed.

21 References and Standards

This policy has been prepared with reference to the following instruments and sources:

- United Nations Convention on the Rights of the Child (UNCRC), 1989.
- Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse (Lanzarote Convention), 2007.
- Charter of Fundamental Rights of the European Union, Article 24.
- Directive 2011/93/EU of the European Parliament and of the Council on combating the sexual abuse and sexual exploitation of children and child pornography.
- European Commission, EU Strategy on the Rights of the Child, COM(2021) 142 final.
- European Commission, Recommendation on developing and strengthening integrated child protection systems in the best interests of the child, April 2024.
- Keeping Children Safe, International Child Safeguarding Standards and How to Implement Them, 2024 edition.
- Regulation (EU) 2016/679 (General Data Protection Regulation).

- Italian Personal Data Protection Code (Legislative Decree No. 196/2003, as amended by Legislative Decree No. 101/2018).
- Legislative Decree No. 39/2014 and Art. 25-bis of Presidential Decree No. 313/2002.
- Law No. 47/2017 on the protection of unaccompanied foreign minors.
- Law No. 71/2017 on the prevention of cyberbullying, as amended by Law No. 70/2024.
- Art. 10 of the Italian Civil Code and Arts. 96–97 of Law No. 633/1941 on the right to one's image.
- NSPCC, safeguarding and child protection guidance.
- European Commission, CERV call documents, Erasmus+ Programme Guide and Horizon Europe ethics self-assessment guidance on the involvement of minors.

This document is intended to be read together with PRO RIGHTS' Data Protection Policy and Code of Ethics, where applicable to a given project.

ANNEX I

General Participation and Activity Consent Form

Organisation / Organizzazione: PRO RIGHTS – Professionisti per la promozione e protezione dei diritti fondamentali

PURPOSE / FINALITÀ

CHILD'S DETAILS / DATI DEL MINORE

FULL NAME / NOME E COGNOME

AGE / ETÀ

DATE OF BIRTH / DATA DI
NASCITA

PARENT OR GUARDIAN / GENITORE O TUTORE LEGALE

FULL NAME / NOME E COGNOME

RELATIONSHIP / RAPPORTO CON IL MINORE

EMAIL

PHONE / TELEFONO

CONSENT DECLARATION / DICHIARAZIONE DI CONSENSO

I hereby give my consent for my child to participate in activities organised by PRO RIGHTS. I confirm that I have received clear information about the nature, purpose and duration of the activity, the supervision arrangements, and the organisation's Child Protection Policy. I understand that participation is voluntary and that I may withdraw my consent at any time by written notice.

Autorizzo la partecipazione di mio/a figlio/a alle attività organizzate da PRO RIGHTS. Dichiaro di aver ricevuto informazioni chiare sulla natura, le finalità e la durata dell'attività, sulle modalità di supervisione e sulla Child Protection Policy dell'organizzazione. Comprendo che la partecipazione è volontaria e che posso revocare il consenso in qualsiasi momento mediante comunicazione scritta.

I declare that I hold parental responsibility for the child and sign in agreement with the other holder of parental responsibility, where applicable (Arts. 316 and 320 Italian Civil Code), or that I am the child's legal guardian.

Dichiaro di esercitare la responsabilità genitoriale sul minore e di sottoscrivere d'intesa con l'altro genitore, ove esistente (artt. 316 e 320 c.c.), ovvero di esserne il tutore legale.

☐ I have read the information notice on the processing of my child's personal data for the management and safety of the activity (Art. 13 GDPR); this processing is necessary for participation. / Dichiaro di aver preso visione dell'informativa sul trattamento dei dati personali del minore per la gestione e la sicurezza dell'attività (art. 13 GDPR); tale trattamento è necessario ai fini della partecipazione.

☐ OPTIONAL — I consent to the processing of health information I choose to provide (e.g. allergies, medication needs) solely to protect my child's health and safety during the activity (Art. 9(2)(a) GDPR). / FACOLTATIVO — Acconsento al trattamento delle informazioni sanitarie che scelgo di fornire (es. allergie, terapie) al solo fine di tutelare la salute e la sicurezza del minore durante l'attività (art. 9, par. 2, lett. a GDPR).

Emergency contact (name, phone) / Contatto di emergenza (nome, telefono):

SIGNATURE — PARENT / GUARDIAN

DATE / DATA

If the child is aged 14–17, the child must also sign below. If the child is under 14, the activity has been explained to them in age-appropriate terms and they have agreed to take part (assent). / Se il minore ha un'età compresa tra 14 e 17 anni, deve firmare anch'egli/ella qui sotto. Se ha meno di 14 anni, l'attività gli/le è stata spiegata in modo adeguato all'età e ha manifestato il proprio assenso.

SIGNATURE — MINOR (14–17)

DATE / DATA

ANNEX II

Media and Image Consent Form

Organisation / Organizzazione: PRO RIGHTS – Professionisti per la promozione e protezione dei diritti fondamentali

PURPOSE / FINALITÀ

CHILD'S DETAILS / DATI DEL MINORE

FULL NAME / NOME E COGNOME

AGE / ETÀ

DATE OF BIRTH / DATA DI
NASCITA

PARENT OR GUARDIAN / GENITORE O TUTORE LEGALE

FULL NAME / NOME E COGNOME

RELATIONSHIP / RAPPORTO CON IL MINORE

EMAIL

PHONE / TELEFONO

DECLARATION / DICHIARAZIONE

I, the undersigned, being the parent or legal guardian of the minor named above, consent to the recording, photographing or filming of the child during PRO RIGHTS activities, and authorise PRO RIGHTS to use these materials solely for educational, training or awareness-raising purposes, through the channels ticked below, for a period of five (5) years from the date of signature, unless consent is withdrawn earlier.

Il/La sottoscritto/a, genitore o tutore legale del minore sopra indicato, autorizza la ripresa fotografica o audiovisiva del minore durante le attività organizzate da PRO RIGHTS e il relativo utilizzo esclusivamente per finalità educative, formative o di sensibilizzazione, attraverso i canali selezionati qui sotto, per un periodo di cinque (5) anni dalla data della firma, salvo revoca anticipata.

- ☐ Printed materials and project reports / Materiali stampati e report di progetto
- ☐ PRO RIGHTS and project websites / Siti web di PRO RIGHTS e del progetto
- ☐ Official social media channels of PRO RIGHTS and of project partners / Canali social ufficiali di PRO RIGHTS e dei partner di progetto
- ☐ Video recording of online or in-person sessions / Registrazione video delle sessioni online o in presenza
- ☐ Publication of the child's first name alongside the images / Pubblicazione del nome del minore insieme alle immagini
 - Images and recordings will not be sold, used for commercial purposes or shared with third parties other than project partners and the granting authority, for the purposes above. / Le immagini non saranno vendute, usate per fini commerciali né cedute a terzi diversi dai partner di progetto e dall'autorità che finanzia il progetto, per le finalità sopra indicate.
 - Consent may be withdrawn at any time in writing to info@thepriorights.com. / Il consenso può essere revocato in qualsiasi momento per iscritto.
 - The child's name or other personal identifiers will not be published alongside images unless the relevant box above is ticked. / Il nome o altri dati identificativi del minore non saranno pubblicati insieme alle immagini, salvo selezione della relativa casella.

- I declare that I hold parental responsibility for the child and sign in agreement with the other holder of parental responsibility, where applicable (Arts. 316 and 320 Italian Civil Code), or that I am the child's legal guardian. / Dichiaro di esercitare la responsabilità genitoriale sul minore e di sottoscrivere d'intesa con l'altro genitore, ove esistente (artt. 316 e 320 c.c.), ovvero di esserne il tutore legale.

SIGNATURE — PARENT / GUARDIAN

DATE / DATA

If the child is aged 14–17, the child must also sign below. If the child is under 14, the activity has been explained to them in age-appropriate terms and they have agreed to take part (assent). / Se il minore ha un'età compresa tra 14 e 17 anni, deve firmare anch'egli/ella qui sotto. Se ha meno di 14 anni, l'attività gli/le è stata spiegata in modo adeguato all'età e ha manifestato il proprio assenso.

SIGNATURE — MINOR (14–17)

DATE / DATA

ANNEX III

Data Collection and Research Consent Form

Organisation / Organizzazione: PRO RIGHTS – Professionisti per la promozione e protezione dei diritti fondamentali

PURPOSE / FINALITÀ

CHILD'S DETAILS / DATI DEL MINORE

FULL NAME / NOME E COGNOME

AGE / ETÀ

DATE OF BIRTH / DATA DI
NASCITA

PARENT OR GUARDIAN / GENITORE O TUTORE LEGALE

FULL NAME / NOME E COGNOME

RELATIONSHIP / RAPPORTO CON IL MINORE

EMAIL

PHONE / TELEFONO

DECLARATION / DICHIARAZIONE

I, the undersigned, parent or legal guardian of the minor named above, authorise PRO RIGHTS to collect, process and securely store my child's personal data within the framework of educational, research and monitoring activities carried out under EU-funded programmes.

- I have received and understood clear information about the purpose, methods and data protection measures applied by PRO RIGHTS.
- Participation is voluntary and may be withdrawn at any time without negative consequence.
- Data will be processed in compliance with GDPR (EU) 2016/679 and Legislative Decree 101/2018, stored securely, and anonymised when published.
- I may request access to, correction or deletion of the data by contacting info@theprorights.com, subject to the legal and contractual retention obligations explained in the information notice.
- The activity has been explained to my child in age-appropriate terms; my child agrees to take part and may stop at any time without giving reasons.
- I understand that if my child discloses harm or a risk of harm during the activity, this will be shared with the Child Protection Officer under the Child Protection Policy.
- I declare that I hold parental responsibility for the child and sign in agreement with the other holder of parental responsibility, where applicable (Arts. 316 and 320 Italian Civil Code), or that I am the child's legal guardian.

Il/La sottoscritto/a autorizza PRO RIGHTS alla raccolta, al trattamento e alla conservazione sicura dei dati personali del minore nell'ambito di attività educative, di ricerca o monitoraggio realizzate in programmi finanziati dall'Unione Europea, alle condizioni sopra indicate. Dichiaro che l'attività è stata spiegata al minore in modo adeguato all'età e che questi acconsente a partecipare; che eventuali rivelazioni di situazioni di rischio o pregiudizio saranno comunicate al Child Protection Officer; di sottoscrivere d'intesa con l'altro genitore, ove esistente (artt. 316 e 320 c.c.).

☐ I authorise the collection and processing of my child's data for the purposes indicated above. / Autorizzo la raccolta e il trattamento dei dati personali del minore per le finalità sopra indicate.

SIGNATURE — PARENT / GUARDIAN

DATE / DATA

If the child is aged 14–17, the child must also sign below. If the child is under 14, the activity has been explained to them in age-appropriate terms and they have agreed to take part (assent). / Se il minore ha un'età compresa tra 14 e 17 anni, deve firmare anch'egli/ella qui sotto. Se ha meno di 14 anni, l'attività gli/le è stata spiegata in modo adeguato all'età e ha manifestato il proprio assenso.

SIGNATURE — MINOR (14–17)

DATE / DATA

ANNEX IV

Child Protection Concern / Incident Report Form

To be completed by the person raising the concern and passed to the Child Protection Officer without delay.

Date and time of report	
Name and role of person reporting	
Date, time and location of the concern	
Child(ren) involved (name, age)	
Nature of the concern (factual description only)	
Child's own words, recorded verbatim (if a disclosure was made)	
Any immediate action already taken	
Witnesses, if any	
Report received by (CPO / deputy)	
Initial risk assessment (low / medium / high)	
Authorities or services contacted (who, when, reference)	
Parents / guardians informed? (yes / no — if no, reason)	
Next steps agreed	

ANNEX V

Activity Risk Assessment Template

To be completed by the activity organiser and reviewed by the CPO before an activity involving children takes place.

Activity name and description	
Date(s) and location	
Number and age range of children expected	
Risk level (Low / Medium / High — see Section 8)	
Identified hazards	
Mitigating measures in place	
Supervision ratio and named supervisors	
Vetting status of staff and volunteers involved (Section 9.1)	
Accessibility and reasonable adjustments	
Online platform and security settings (if applicable)	
Local emergency and child-protection contacts (if outside Italy)	
Consent forms required (Annex I / II / III)	
CPO sign-off (name, date)	

ANNEX VI

Child-Friendly Summary of this Policy

To be read with, or explained to, children at the start of every activity classified as medium or high risk (Section 20). Available in other languages on request. / Da leggere o spiegare ai bambini e ai ragazzi all'inizio di ogni attività a rischio medio o alto (Sezione 20).

KEEPING YOU SAFE WITH PRO RIGHTS

- You have the right to be safe, to be respected and to be listened to — whoever you are and wherever you come from.
- The adults working with you follow clear rules. They will never hurt you, embarrass you, ask you to keep secrets or contact you privately online.
- You can say no. You do not have to take part in anything, or be photographed or filmed, if you do not want to.
- If something makes you feel unsafe, worried or uncomfortable — here, online or anywhere else — you can tell any adult from PRO RIGHTS you trust. You will be taken seriously, and it is never your fault.
- The adult cannot keep what you say a secret if you or someone else may be in danger, but they will only share it with people who can help, and they will tell you what happens next.

SINTESI IN ITALIANO

- Hai il diritto di essere al sicuro, rispettato/a e ascoltato/a, chiunque tu sia e da qualunque luogo tu venga.
- Gli adulti che lavorano con te seguono regole chiare: non ti faranno mai del male, non ti metteranno in imbarazzo, non ti chiederanno di mantenere segreti e non ti contatteranno privatamente online.
- Puoi dire di no: non sei obbligato/a a partecipare, né a essere fotografato/a o filmato/a, se non vuoi.
- Se qualcosa ti fa sentire in pericolo, preoccupato/a o a disagio — qui, online o altrove — puoi dirlo a qualsiasi adulto di PRO RIGHTS di cui ti fidi. Verrai preso/a sul serio e non sarà mai colpa tua.
- L'adulto non può tenere segreto ciò che racconti se tu o qualcun altro siete in pericolo, ma lo dirà solo a chi può aiutare e ti spiegherà cosa succederà dopo.

WHO TO TALK TO / A CHI RIVOLGERTI

Child Protection Officer: Maja Bova — majabova@gmail.com

Telefono Azzurro: 19696 · **Emergenza Infanzia:** 114 · **Emergency / Emergenza:** 112

ANNEX VII

Code of Conduct Acknowledgement Form

To be signed by every staff member, volunteer, intern, consultant and board member before taking part in any activity involving children (Section 9.1). The signed form is kept by the CPO. / Da sottoscrivere prima di partecipare a qualsiasi attività con minori.

Full name / Nome e cognome: _____

Role / Ruolo: _____

Organisation (if partner or consultant) / Organizzazione: _____

DECLARATION / DICHIARAZIONE

I confirm that I have received, read and understood the PRO RIGHTS Child Protection and Safeguarding Policy (v2.2), including the Code of Conduct in Section 9.2, and that I will comply with it. I understand that any breach may lead to disciplinary or contractual measures and, where appropriate, to referral to the competent authorities. I confirm that I have no conviction, pending criminal proceedings or disciplinary finding relevant to the safety of children, and I undertake to inform the CPO immediately should this change.

Dichiaro di aver ricevuto, letto e compreso la Child Protection and Safeguarding Policy di PRO RIGHTS (v2.2), incluso il Codice di Condotta di cui alla Sezione 9.2, e di impegnarmi a rispettarla. Sono consapevole che ogni violazione può comportare misure disciplinari o contrattuali e, ove necessario, la segnalazione alle autorità competenti. Dichiaro di non avere condanne, procedimenti penali pendenti o provvedimenti disciplinari rilevanti per la sicurezza dei minori e mi impegno a informare immediatamente il CPO di ogni variazione.

SIGNATURE / FIRMA

DATE / DATA

PRO RIGHTS – Professionisti per la promozione e protezione dei diritti fondamentali | Child Protection and Safeguarding Policy, v2.2 — last updated September 2026