



**Save the Children**

CHILD SAFEGUARDING POLICY  
AND CODE OF CONDUCT

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**GENERAL PROCEDURE  
FOR REPORTING AND  
RESPONDING TO  
SUSPECTED MALTREATMENT,  
ABUSE OR EXPLOITATION  
OF CHILDREN**

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Last updated march 2021

Effective since May 10, 2023,  
Save the Children Italy has become  
formally ETS (Third Party Institution  
Sector), following the  
registration provision  
Single National Register of Third  
Sector and has therefore changed the  
its company name in  
“Save the Children Italy – ETS”;  
however the information reported  
within this document  
were drawn up in previous data,  
when the Organization emerged  
registered in the ONLUS register,  
pursuant to article 32, paragraph 7  
of Law 125 of 2014, sector  
of NGO activities.



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# 1. INTRODUCTION

The maltreatment, exploitation and abuse of children is common to all countries and societies, constituting a violation of their fundamental rights. Violence against children is never acceptable and an overall commitment to the protection of children's rights means that Save the Children is especially committed to protecting all the children with whom the organisation comes into direct contact.

The aim of this procedure (henceforth "**the General Procedure**") is to ensure that the reporting and response to any concerns, suspicions or certainties regarding breaches of the Code of Conduct in relation to the maltreatment, abuse or exploitation of children by staff or volunteers of Save the Children or one of its partner organisations are handled as quickly and efficiently as possible in line with the principles set out in the Child Safeguarding Policy (of which the General Procedure is an integral part). The General Procedure also applies to cases in which persons from outside the organisation are suspected or accused.

This General Procedure is compulsory for the staff of Save the Children, its volunteers and the staff of partner organisations. Any complaints of maltreatment, abuse or exploitation, including of a sexual nature, are dealt with following these guidelines, in line with Save the Children's internal disciplinary procedures and current national legislation. Any member of staff, representative, or member of staff of a partner organisation of Save the Children Italy may naturally immediately report any cases in which they believe a criminal offence has been committed to the law enforcement agencies<sup>1</sup>.

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# 2. DEFINITIONS AND FIELDS OF APPLICATION

The General Procedure applies to:

- members of the Governing Board, the General Assembly and the Supervisory Board, and volunteers (henceforth "the representatives");
- staff of Save the Children Italy, hired on any kind of contract whatsoever (henceforth "the staff of Save the Children");
- staff and representatives of partner organisations and any other individual, group or organisation that has relations of a formal/contractual nature with Save the Children involving any type of direct contact with children (henceforth "the staff of partner organisations");
- donors, journalists, celebrities, politicians and anyone else directly involved in the projects or services of Save the Children for as long as this direct contact lasts (henceforth "visitors").

Key definitions:

- Child: this term includes children of all ages and so the General Procedure deals with the protection of all persons under the age of 18.
- Child abuse: any acts that may cause physical or psychological harm to a child, directly or indirectly result in harm to a child, or damage the prospects of a child's safe and healthy development into adulthood<sup>2</sup>.  
The main categories of abuse are defined by the World Health Organisation as physical violence, emotional violence, neglect and negligent treatment, and sexual exploitation and abuse<sup>3</sup>. We intend to include "the act of witnessing" intrafamilial violence among these categories<sup>4</sup>.

- Sexual exploitation of a child: the abuse of a position of vulnerability, differential power, or trust in relation to a child for sexual purposes, including – but not limited to – profiting monetarily, socially or politically from the sexual exploitation.

The following are examples of situations that must be reported (the list is not exhaustive, however):

- A child reveals a case of abuse or bears signs that give rise to suspicions that the child or other children are being exploited or abused.
- A member of Save the Children Italy, one of its volunteers, or staff from a partner organisation discovers or suspects that a child has been exploited/abused or risks being exploited/abused.
- A family member or a member of the community informs staff of Save the Children Italy or one of its volunteers, or staff from a partner organisation that a child has been harmed or is at risk of being harmed.
- A member of staff of Save the Children Italy, one of its volunteers, or a member of staff of a partner organisation has breached the Code of Conduct.
- A member of staff of Save the Children Italy, one of its volunteers, or a member of staff of a partner organisation abuses a child s/he has come into contact with through the work s/he is engaged in for Save the Children Italy.
- A member of staff of Save the Children Italy, one of its volunteers, or a member of staff of a partner organisation abuses a child outside the working environment, a member of the child's family or a child with whom s/he has come into contact, or sexually exploits children forced into prostitution.
- A child with whom Save the Children Italy or one of its partners has contacts abuses another child.

## 3. CORE PRINCIPLES

In order to protect children, Save the Children applies the General Procedure respecting the following guiding principles:

### 3.1 Safety and welfare of children

The safety and welfare of children are of primary concern. No child should be put at risk by any action that is taken. The superior interests of the child will be consistently sought throughout the entire process of reporting, assessing and responding to a complaint.

### 3.2 Professionalism and confidentiality for the duration of the process

All complaints will be dealt with professionally, confidentially and expeditiously. Save the Children Italy will take all concerns and complaints extremely seriously (even when they are anonymous) and will ensure that everyone involved is treated in a fair and equitable way.

The child victims of abuse, witnesses and subjects of the complaint all have a right to confidentiality. Confidentiality here means that any complaints made within the organisation should only be made known to the persons mentioned in this General Procedure. In other words, only those people who “need to know” will be informed, using a “chain of command” that is as short as possible in order to avoid potential leaks and the resultant violation of privacy. Confidentiality and privacy must be guaranteed at every stage, from the reporting of a case to the secure storing of records and documentation, and also as regards any disciplinary action taken against members of staff.

### **3.3 Respect for all parties concerned**

Any member of staff who knowingly and wilfully reports false or malicious information concerning suspected maltreatment or abuse will face disciplinary action. Everyone concerned, including the subject of the complaint, must be treated with respect, dignity and sensitivity for the entire duration of the proceedings. The suspected or accused person must be informed as soon as possible that an internal investigation will be carried out and then kept informed of the progress of this investigation unless the law enforcement agencies or judicial authorities advise otherwise, or if this is not in the best interests of the child.

### **3.4 Dissemination and understanding of the procedures for reporting a case**

Children and members of the community on whose behalf Save the Children is working shall be informed, in the most appropriate way, on how to report any concerns or suspicions of exploitation and abuse, above all of a sexual nature, whether these concerns or suspicions involve the staff of Save the Children, one of its volunteers, the staff of partner organisations, or anyone else.

### **3.5 Best practices for receiving and reporting information regarding suspected abuse**

Listening to people and taking statements is a delicate matter, particularly when the person concerned is a child, and requires care, the respect of certain fundamental rules, experience and specific training. Save the Children Italy guarantees its staff basic training and the possibility of immediately receiving specific support from the National Focal Point or another person designated by the National Focal Point. A crucial part of reporting a complaint is the way in which the information about the suspected abuse is recorded and communicated. All essential information must be recorded immediately and accurately in order for a quick, objective assessment to be made. The Report Form (Appendix 4) has been designed to guide the process of collecting information and must be used internally to record and report any types of accusations, complaints or doubts concerning the possible abuse of children.

### **3.6 Access to the competent authorities**

Any child who is a victim of abuse has the right to have access to justice through police investigations and criminal prosecution. The involving of the competent authorities must always be taken into consideration.

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## 4. AWARENESS AND DISSEMINATION OF THE GENERAL

The General Procedure, together with the Child Safeguarding Policy and the Code of Conduct and national legislation regarding abuse, is to be made available not only to the staff of Save the Children, its volunteers and the staff of partner organisations, but also to all other interested parties (institutions, family members, guardians, community representatives etc) so that Save the Children's approach to problems of this nature is made very clear.

The staff of Save the Children Italy, its volunteers and the staff of partner organisations must sign the Declaration of Acceptance of the Child Safeguarding Policy and the General Procedure (Appendix 1), and receive all the necessary documentation regarding their implementation.

The staff of Save the Children, its volunteers and the staff of partner organisations must receive ongoing training as regards the Policy and the relative General Procedure for Child Safeguarding through meetings, workshops and the dissemination of material.

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## 5. COLLABORATING WITH PARTNERS

When Save the Children collaborates with partner agencies or organisations, a written agreement must be signed in which the partner undertakes to apply the Policy and General Procedure, adapting its own internal procedures where necessary. Where a partner has its own Safeguarding Policy, this must be validated by Save the Children Italy and common procedures must be agreed upon for the reporting of any cases of abuse.

Save the Children Italy and its partners reserve the right to autonomously refer any reported cases of abuse to the competent authorities in the event of disagreement over what action should be taken.

The aim of the written agreement is to guarantee clarity regarding roles and responsibilities in the event of any action being taken so that:

- the action is taken considering the best interests of the child at risk;
- there is no duplication of the work being carried out;
- children are not subjected to pointless questioning.

## 6. GENERAL PROCEDURE

In this section the **detailed General Procedure for reporting a complaint** is described for five different cases.

IN CASES 1 AND 3 STAFF MUST FILL IN THE “KEY CONTACT DETAILS” FORM (APPENDIX 2)

CASE 1	SUSPECTED PERPETRATOR	WHISTLE-BLOWER
	Member of staff or representative of Save the Children, or visitor	Member of staff or representative of Save the Children, or visitor

### STAGE I

You must privately report your suspicions or certainties as soon as possible (by telephone, in person or in writing) to your line manager (by the end of the same working day and in any case within 24 hours). Preferably use the Report Form (Appendix 3), which must in any case be filled in, even at a later date.

If the suspected perpetrator is your line manager, you must bring the matter to the attention of the person above them to discuss the matter.

If, through circumstances beyond your control, this person cannot be reached within the specified timeframe, you may report the matter directly to another person listed in “**Key Contact Details**” (Appendix 2)

### STAGE II

The person who received the complaint will confidentially inform the National Focal Point for Child Safeguarding (immediately, i.e. by the end of the same working day and in any case within 24 hours).  
as soon as

### STAGE III

The National Focal Point will quickly, and never more than 24 hours later, assess the information received and together with the manager who forwarded the complaint discuss how to proceed in relation to the Child Safeguarding Policy. The National Focal Point will then officially inform the General Director and the Head of the Human Resources Department of the complaint and these three persons will form a case management team (under the direction of the General Director).

The case management team, after assessing the degree of urgency of the case and the most suitable timeframe, can decide to:

1. act on the basis of the information received, which has been reported in detail and assessed;
2. plan an internal inquiry, coordinated by the National Focal Point, with the sole aim of obtaining the necessary details or additional elements in order to be able to take any subsequent decisions in an informed way that is fair to everyone involved;
3. discuss and agree with the line manager of the subject of the complaint any eventual measures to be taken to lessen the risk to children who have been in contact with this person.

### STAGE IV

The case management team, based on the information in its possession and depending on the seriousness of the case, can:

- a. decide to mitigate or play down any concerns when, for example, following an



- initial assessment, important details are not confirmed;
- b. decide to take disciplinary action against the subject of the complaint after first communicating this decision to the Unit manager and Head of Division of this person;
  - c. decide whether to refer the case to the judicial authorities, law enforcement agencies and social services (for the protection of the children involved); if they do, the team will convene a Crisis Unit, made up of the Management, the Head of Division of the subject of the complaint, and the National Focal Point; the Crisis Unit may seek the opinions of one or more previously identified external experts.

The Crisis Unit is under the direct responsibility of the Management and has the task of:

- guaranteeing primarily the safety of the children and then of everyone else concerned, deciding on specific measures and an action plan;
- discussing and determining how best to inform and involve the child's parents or guardian;
- drafting the report or complaint for the judicial authorities, checking its contents (also consulting external experts) and delivering it following the best practices eventually agreed upon with the institution to which it is addressed;
- determining to what extent the subject of the complaint's contacts with children should be restricted until the case is closed, taking into consideration any instructions received from the law enforcement agencies or judicial authorities, and finding the most appropriate ways of guaranteeing the protection of the children when doing this;
- deciding on an internal action plan to monitor the progress of the case (including a subdivision of roles, responsibilities and timeframes) and to close the case;
- confidentially informing the Head of the Communications Division, on a strictly "need to know" basis, in order to prepare an eventual communications strategy;
- informing the member of the Governing Board responsible for Child Safeguarding of the decision to make an official report or complaint against the member of staff or representative of Save the Children.

#### **STAGE V**

All records and documentation will be stored securely by the National Focal Point for the duration of the case and shared, in the strictest confidence, only on a strictly "need to know" basis.

#### **STAGE VI**

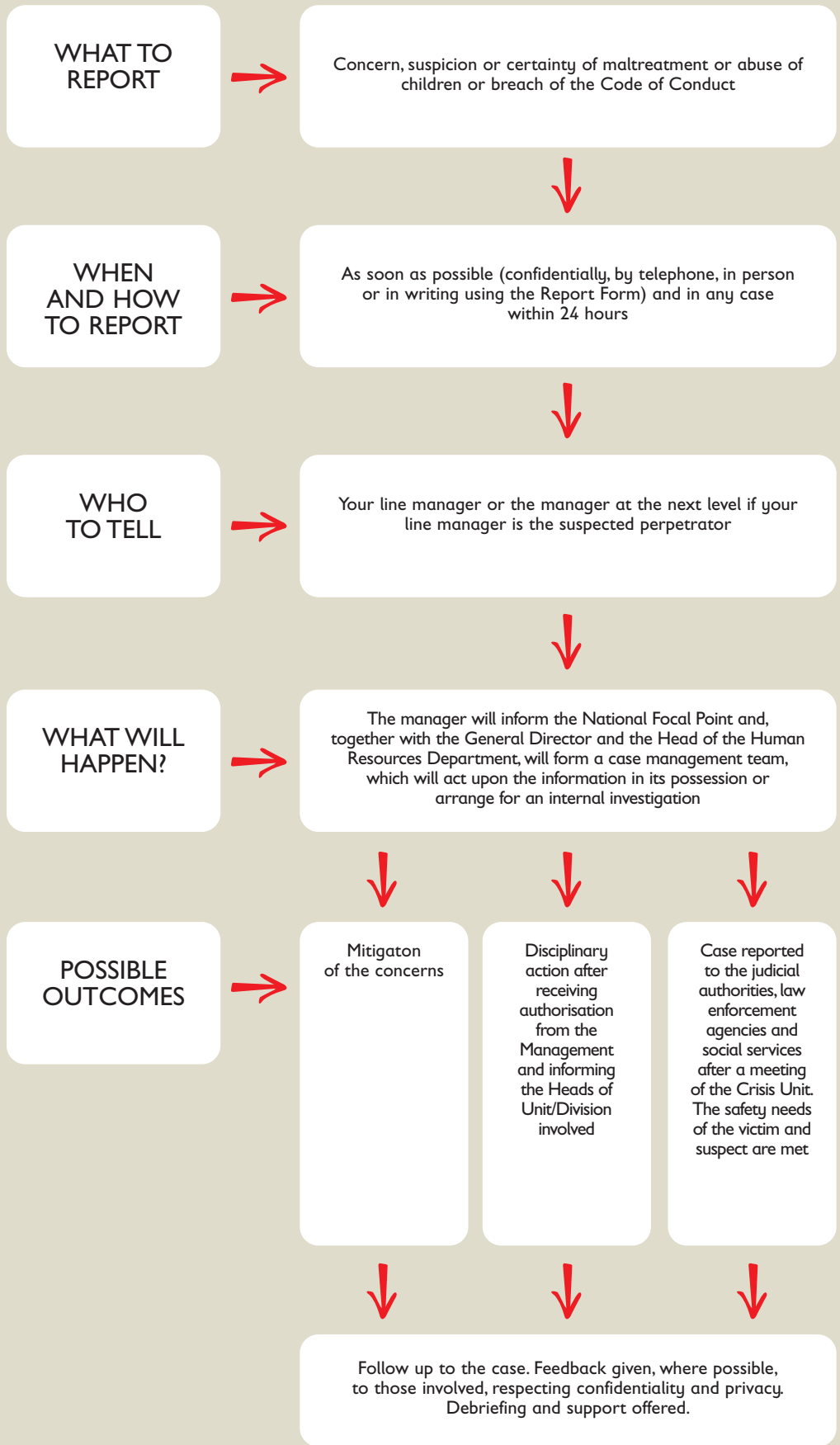
Adequate feedback and support will be provided for all those involved until the case has been closed.

#### **STAGE VII**

Registering of all complaints centrally and general anonymous information on the complaints sent to the Heads of Division and the representative of the Governing Board (on a six-monthly basis)

**FLOW CHART- CASE 1**

**Suspected perpetrator:** member of staff or representative of Save the Children, or visitor  
**Whistle-blower:** member of staff or representative of Save the Children, or visitor



**CASE 2 SUSPECTED PERPETRATOR WHISTLE-BLOWER**

An adult external to Save the Children.

Member of staff or representative of Save the Children, or visitor.

**PREMISE**

The staff of Save the Children must report centrally any situation they find out about while working that might involve a criminal offence or is gravely prejudicial to the safety of a presumed child victim.

**STAGE I**

You must privately report your suspicions or certainties as soon as possible (by telephone, in person or in writing) to your line manager (by the end of the same working day and in any case within 24 hours). Preferably use the Report Form (Appendix 3) , which must in any case be filled in, even at a later date.

If, through circumstances beyond your control, this person cannot be reached within the specified timeframe, you may report the matter directly to another person listed in “Key Contact Details” (Appendix 2).

**STAGE II**

The person who received the complaint will carry out an initial assessment and then forward the complaint (by mail or fax) with the utmost urgency (and in any case always within 24 hours) to the National Focal Point and her/his direct Head of Unit/Department and/or Head of Division, providing an assessment of the degree of urgency involved.

**STAGE III**

The Head of Division will convene a meeting with the National Focal Point and the person who forwarded the complaint in a timeframe dictated by the degree of urgency. Together they form the case management team.

**STAGE IV**

The case management team will study the information they have received. They may decide to call upon other individuals from within the organisation who are considered useful in achieving a better assessment and handling of the case. Furthermore, they may already decide at this stage to hear other opinions or consult external experts on the matter, from both public institutions and third-sector bodies with whom the organisation has framework partnership agreements.

Once the persons who are considered useful in achieving a better assessment and handling of the case have been identified, they will together form the Suspected Abuse Rapid Response Team (henceforth Response Team).

**STAGE V**

Mandate of the Response Team:

Try and understand what has happened; assess how serious the situation is and confirm the degree of urgency; decide whether any further action needs to be taken to better understand what has happened, determining who should do what; ensure the safety of the child, identifying the action that needs to be taken; examine the legal aspects of how to proceed; reach a final decision on the case; decide on an action plan, with specific timeframes, roles and responsibilities, to close the case.

The Head of the Division involved is in charge of the Response Team. The coordinating and supervising of the action plan are the responsibility of the National Focal Point.

After establishing the degree of urgency and timeframe, the Response Team could decide to:

1. act on the basis of the information received, which has been reported in detail and assessed;
2. plan an internal inquiry, coordinated by the National Focal Point, with the sole aim of obtaining the necessary details or additional elements in order to be able to take any subsequent decisions in an informed way that is fair to everyone involved;
3. discuss and agree on any eventual measures to be taken to lessen the risk to children who have been in contact with the subject of the complain

#### **STAGE VI**

Based on the information in its possession and depending on the seriousness of the case, the Response Team could:

- a) decide to mitigate or play down any concerns when, following an initial assessment, important details are not confirmed;
- b) assess whether to refer the case to the judicial authorities, law enforcement agencies and social services (for the protection of the children involved), in which case the opinion of the Management must be heard first; the Head of the Communications Division will be informed confidentially, on a strictly “need to know” basis, in order to draw up any eventual communications strategy.

At any stage of the assessment, the Response Team can seek the opinion of one or more external experts on the issue from public institutions and third-sector bodies with whom Save the Children already has framework partnership agreements.

#### **STAGE VII**

All records and documentation will be stored securely by the National Focal Point for the duration of the case and shared, in the strictest confidence, only on a strictly “need to know” basis.

#### **STAGE VIII**

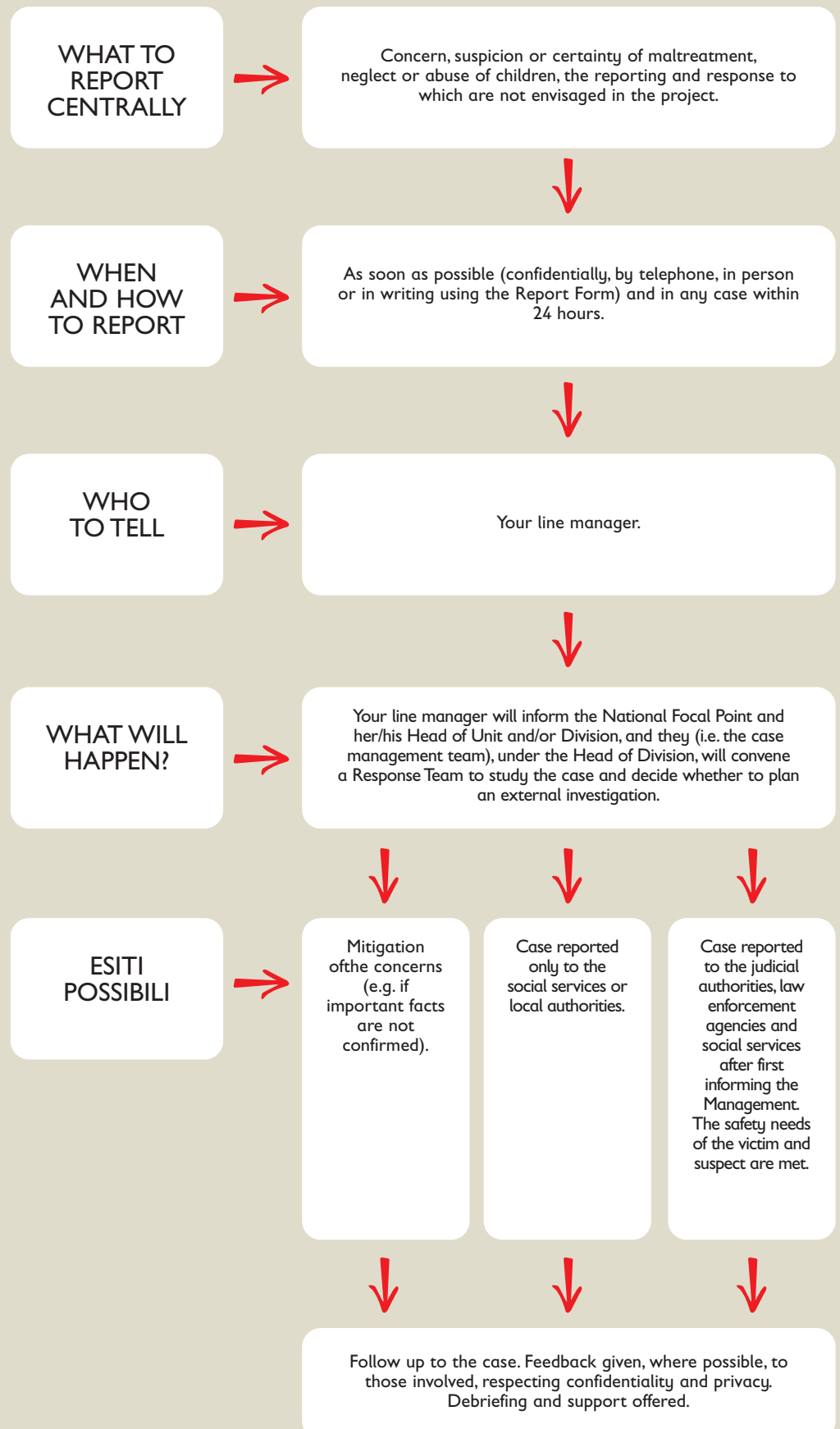
Adequate feedback and support will be provided for all those involved until the case has been closed.

#### **STAGE IX**

Registering of all complaints centrally and general anonymous information on the complaints sent to the Heads of Division and the representative of the Governing Board (on a six-monthly basis).

## FLOW CHART-CASE TWO

**Suspected perpetrator:** member of staff or representative of Save the Children, or visitor  
**Whistle-blower:** member of staff or representative of Save the Children, or visitor



CASE 3	SUSPECTED PERPETRATOR	WHISTLE-BLOWER
	Member of staff or representative of a partner organisation.	Member of staff or representative of a partner organisation.

The partner will proceed as indicated in the written agreement with Save the Children, which will have identified one of the following situations:

- a) The partner organisation had its own Child Safeguarding Policy and General Procedure when the partnership began, already examined and accepted by Save the Children Italy.
- b) The partner organisation did not have its own Child Safeguarding Policy, Code of Conduct and General Procedure when the partnership began. Having, therefore, signed the documents of Save the Children Italy, its staff must refer to these when reporting and responding to cases of suspected maltreatment and abuse or breaches of the Code of Conduct occurring within the projects or activities in which it is a partner of Save the Children.

**Situation a) The partner, when the partnership began, had its own Child Safeguarding Policy and General Procedure, which were ratified by Save the Children Italy**

#### STAGE I

The partner will activate its own Procedure for Child Safeguarding, which has already been ratified by Save the Children.

#### STAGE II

The internal contact designated by the partner organisation (the person who receives the complaints) will inform Save the Children (generally during the same working day) via the project manager or the Head of Unit representing the partnership. This person will then inform her/his own Head of Division and the National Focal Point. Save the Children may ask for written confirmation in cases in which they have only been informed by word of mouth.

#### STAGE III

The National Focal Point of Save the Children will follow the partner throughout the process of reporting and handling the case.

#### STAGE IV

The partner will act according to a pre-established timeframe and provide specific details to Save the Children. The partner will record all the information in writing and will keep this information securely.

#### STAGE V

The partner will provide Save the Children with constant feedback regarding any action taken and the results of this action (generally within three months).  
 Situation b) The partner organisation, when the partnership began, did not have its own Child Safeguarding Policy, Code of Conduct and General Procedure. It signed the documents of Save the Children Italy and currently refers to these when reporting and responding to suspected cases of maltreatment and abuse or breaches of the Code of Conduct occurring within the projects and activities in which it is a partner of Save the Children.

### STAGE I

You must privately report your concerns, suspicions or certainties as soon as possible (by telephone, in person or in writing) to your line manager within the partner organisation (by the end of the same working day and in any case within 24 hours). Preferably use the Report Form (Appendix 3), which must in any case be filled in, even at a later date.

If the suspected perpetrator is your line manager, you must bring the matter to the attention of someone at a higher level to discuss the matter.

If, through circumstances beyond your control, this person cannot be reached within the specified timeframe, you may report the matter directly to another person listed in “**Key Contact Details**” (Appendix 2).

### STAGE II

The person to whom you forwarded the complaint will confidentially inform the National Focal Point of Save the Children (immediately, i.e. by the end of the same working day and in any case within 24 hours).

This must also be done using the Report Form (Appendix 3) as soon as possible.

### STAGE III

The National Focal Point of Save the Children will quickly, and never more than 24 hours later, assess the information received and together with the person who forwarded the complaint (or whoever is designated to do so by the partner) discuss how to proceed in relation to the Child Safeguarding Policy. The National Focal Point will then officially inform the Head of the Division of the Save the Children liaising with the partner of the complaint. Together with these persons and the person who received the complaint s/he will form a case management team (under the direction of the Head of the Resources and Organisational Development Division).

The case management team, after assessing the degree of urgency of the case and the most suitable timeframe, can decide to:

1. act on the basis of the information received, which has been reported in detail and assessed;
2. plan an internal inquiry, coordinated by the National Focal Point, with the sole aim of obtaining the necessary details or additional elements in order to be able to take any subsequent decisions in an informed way that is fair to everyone involved;
3. discuss and agree with the line manager of the subject of the complaint any eventual measures to be taken to lessen the risk to children who have been in contact with this person.

### STAGE IV

Based on the information in their possession and depending on the seriousness of the case, the case management team could:

- a) decide to mitigate or play down any concerns when, for example, following an initial assessment, important details are not confirmed;
- b) decide to request disciplinary action against the subject of the complaint after first communicating this decision to the Management of the partner organisation;
- c) decide whether to refer the case to the judicial authorities, law enforcement agencies and social services (for the protection of the children involved); if they do, the team will convene a Crisis Unit, made up of the Management, the Head of Division of the subject of the complaint, the Head of the Human Resources Division, the National Focal Point and the representative of the Management of the partner organisation; the Crisis Unit may seek the opinions of one or more previously identified external experts.

The Crisis Unit is under the responsibility of the Management of Save the Children and will guide and support the partner organisation in:

- guaranteeing primarily the safety of the children and then of everyone else concerned, deciding on specific measures and a relevant action plan;
- discussing and determining how best to inform and involve the child's parents or guardian;
- drafting the report or complaint for the judicial authorities, checking its contents (also consulting external experts) and delivering it following the best practices eventually agreed upon with the institution to which it is addressed;
- determining to what extent the subject of the complaint's contacts with children should be restricted until the case is closed, taking into consideration any instructions received from the law enforcement agencies or judicial authorities, and finding the most appropriate ways of guaranteeing the protection of the children when doing this;
- deciding on an internal action plan to monitor the progress of the case (including a subdivision of roles, responsibilities and timeframes) and to close the case;
- confidentially informing the Head of the Communications Division, on a strictly "need to know" basis, in order to prepare an eventual communications strategy;

The Crisis Unit will inform the member of the Governing Board responsible for Child Safeguarding of the decision to make an official report or complaint against the member of staff or representative of the partner organisation of Save the Children.

In particularly serious cases or in cases of gross negligence on the part of the partner organisation to fulfil its obligations to protect children the Crisis Unit can decide to terminate the partnership and rescind the agreement.

#### **STAGE V**

All records and documentation will be stored securely by the National Focal Point for the duration of the case and shared, in the strictest confidence, only on a strictly "need to know" basis.

#### **STAGE VI**

Adequate feedback and support will be provided for all those involved until the case has been closed.

#### **STAGE VII**

Registering of all complaints centrally and general anonymous information on the complaints sent to the Heads of Division and the representative of the Governing Board (on a six-monthly basis).



### FLOW CHART - CASE 3

**Suspected perpetrator:** member of staff or representative of a partner.

**Whistle-blower:** member of staff or representative of a partner.



CASE 4	SUSPECTE ABUSANTE	RECIPIENT OF SEGNALAZIONE	WHISTLE-BLOWER
	Anyone (adulto o minore).	Member of staff of Save the Children (or partner organisation).	Child beneficiary of Save the Children (or partner organisation).

The Procedure in this specific case involves:

A PREPARATORY STAGE: consultation with children, using a participatory format, to work out and choose truly effective ways of presenting complaints and how they can be used.

A stage of RECEIVING AND RESPONDING TO A COMPLAINT by staff: once a complaint has been received and correctly dealt with, it will be assessed and handled in the same way as in the previous cases.

## PREPARATORY

### STEP 1

#### INFORM AND CONSULT THE CHILDREN AND THEIR REPRESENTATIVES

Inform the children and their representatives of their right to be protected, what is meant by abuse or maltreatment, how it can occur, the type of behaviour they can expect from the staff and representatives of Save the Children and other organisations<sup>5</sup>. Informative material on the topic is used, with different levels (for age groups 6-10, 11-13 and 14-18). This material, which contains general guidelines for reporting complaints, will be used to consult the children regarding the complaints procedures. The staff involved will receive special training and a tool-kit to support them in this activity.

### STEP 2

#### DEFINIRE CON I MINORI COSA SEGNALARE E COME FARLO

After establishing the most efficient ways of reporting according to our beneficiaries in the situations in which we operate, we must then agree with children on the kinds of complaints that can be made. Three areas will be indicated:

- a) *Concerns or queries relating to what we do and how we do it in the project or programme we are carrying out.*  
Complaints here could refer to: the quality of the material we hand out, the way in which we carry out our activities etc.
- a) *The behaviour of staff and representatives of our organisation.*  
Complaints about the behaviour of staff may indicate behaviour which breaches our Code of Conduct or the Policy.
- c) *The behaviour of members of the community (adults or children).*  
Complaints may concern inappropriate behaviour, maltreatment or abuse by members of the community (family members, friends, acquaintances or strangers the children come into contact with).

### STEP 3

#### RAISING AWARENESS AMONG ALL CHILDREN AND THE PEOPLE LOOKING AFTER THEM ABOUT WHAT THEY CAN REPORT AND HOW

After identifying and developing the methods, it is essential to inform all children (and the community) about the fact that they can make complaints, what they can complain about and how they can make complaints. Posters could be used and hung in places where the beneficiaries are likely to see them. Meetings must be organised to

explain the contents of the posters, or community representatives/mediators and peer educators could be used to disseminate the messages.

#### STEP 4

### CREATE AND INTRODUCE THE METHODS IDENTIFIED TO RECEIVE AND RESPOND TO COMPLAINTS WITHIN SERVICES, COMMUNITIES OR OTHER CONTEXTS IN WHICH SAVE THE CHILDREN OR ONE OF ITS PARTNERS OPERATES

Generally speaking the system for receiving complaints from child beneficiaries includes: direct conversations with one of various contacts (family members, the project contacts, other operators on the project) and a box for written messages or drawings, which may also be anonymous<sup>7</sup>. If different methods from those proposed prove more effective during the consultation stage (for example, opening a specific e-mail address, creating specific hot lines, holding frequent formal/informal group meetings, using peer educators etc), the material and methods must be changed by the project contacts, but only with the support of the National Focal Point or under her/his supervision.

#### STEP 5

### STAFF TRAINING

All staff will be trained to use the methods identified.

## RECEIVING AND DEALING WITH COMPLAINTS

### STAGE I

The complaints mechanism is organised in such a way that the project manager will receive the complaint in as short a time as possible (if not directly).

### STAGE II

The complaints mechanism is organised in such a way that the project manager will receive the complaint in as short a time as possible (if not directly).

### STAGE III

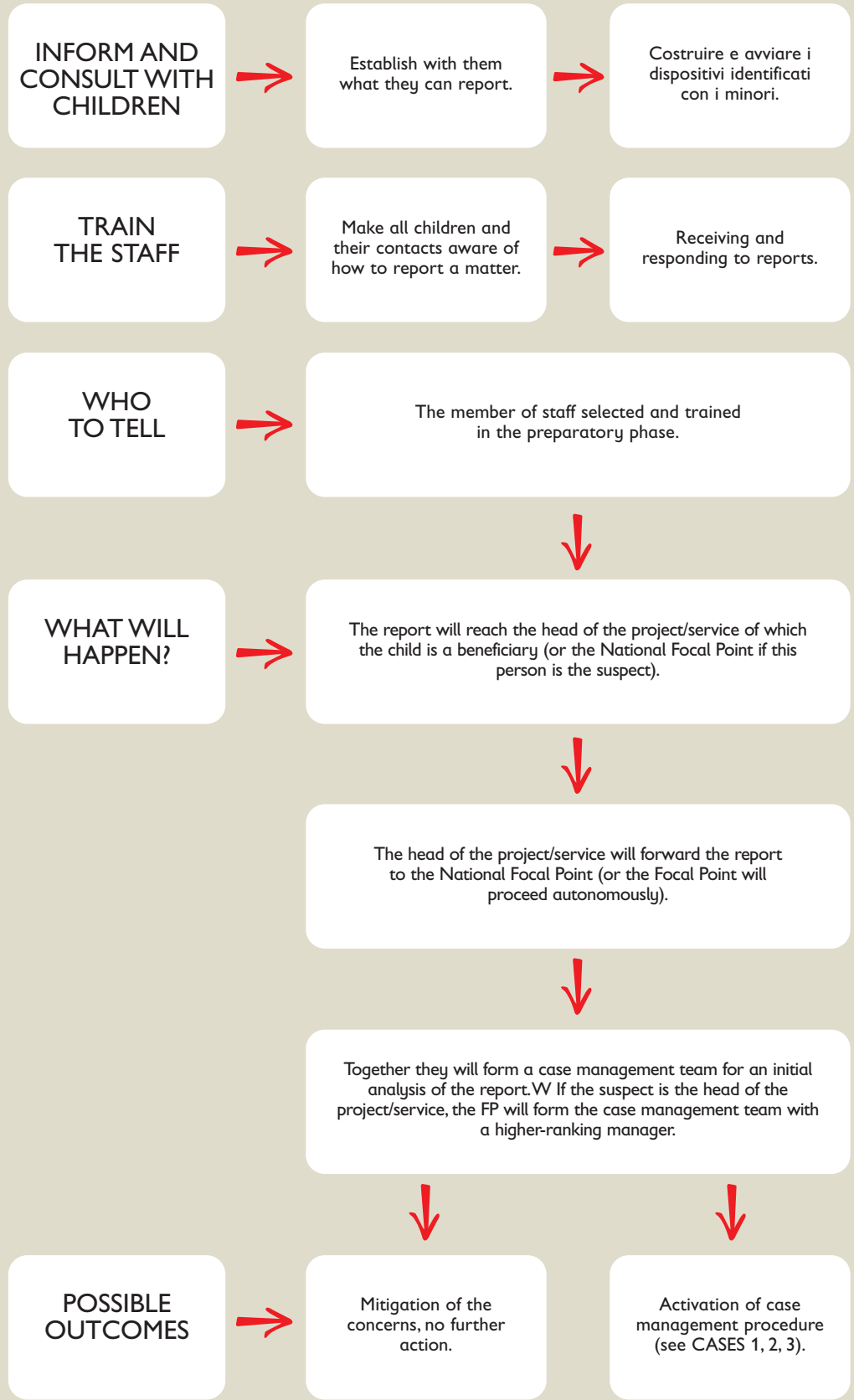
The manager and the National Focal Point will set up a case management team to assess the complaint. Then, as soon as possible and in any case within 24 hours, s/he will decide whether to:

- 1) mitigate or play down concerns (because, for example, there is clear evidence that the complaint is unfounded);
- 2) respond to the complaint in accordance with the specific case (the suspected perpetrator is from within Save the Children or a representative, the suspected perpetrator is an adult from outside the organisation, the suspected perpetrator is a child, the suspected perpetrator is a member of staff or representative of a partner organisation).

**FLOW CHART - CASE 4**

The suspected abuser can be anyone, the whistle-blower was a child beneficiary: creation and use of inclusive child-friendly reporting procedures for child beneficiaries

**PREPARATORY PHASE**



**CASE 5 SUSPECTED PERPETRATOR WHISTLE-BLOWER**

Child (whether beneficiary or not of Save the Children or one of its partners)

Member of staff or representative of Save the Children, member of staff or representative of a partner, or visitor

**PREMISE**

It is compulsory to report centrally, though not exclusively, every situation staff of Save the Children or a partner (or one of their representatives or a visitor) come across during their work that might involve a criminal offence or a situation of danger for a child when another child is the presumed perpetrator.

The organisation guarantees in all cases suitable protection and a suitable handling of the case for all the children involved, whether suspected perpetrators or victims.

**STAGE I**

You must privately report your suspicion or certainty as soon as possible (by telephone, in person or in writing) to your line manager (by the end of the same working day and in any case within 24 hours). Preferably use the Report Form (Appendix 3), which must in any case be filled in, even at a later date.

If, through circumstances beyond your control, this person cannot be reached within the specified timeframe, you may report the matter directly to another person listed in “**Key Contact Details**” (Appendix 2).

**STAGE II**

The person who received the complaint will carry out an initial assessment and then forward the complaint (by mail or fax) with the utmost urgency (and in any case always within 24 hours) to the National Focal Point and her/his direct Head of Unit/Department and/or Head of Division, providing an assessment of the degree of urgency.

**STAGE III**

The Head of Division will convene a meeting with the National Focal Point and the person who forwarded the complaint (the case management team) at a time dictated by the degree of urgency.

**STAGE IV**

The case management team will study the information they have received. They may decide to call upon other individuals from within the organisation who are considered useful in achieving a better assessment and handling of the case. Furthermore, they may already decide at this stage to hear other opinions or consult external experts on the matter, from both public institutions and third-sector bodies with whom the organisation has framework partnership agreements.

Once the persons who can help achieve a better assessment and handling of the case have been identified, they will together form the Suspected Abuse Rapid Response Team (TRRSA).

**STAGE V**

*Mandate of the Response Team:*

Guarantee the safety of the child victim and the child suspected of abuse, using every necessary means. Assess how serious the situation is and confirm the degree of urgency. Try and understand what has happened. Decide whether any further action needs to be taken to better understand what has happened, determining who should do what. Listen to and consider every useful opinion of other people who are legitimately involved (for example the parents/guardians of the children, contacts in the social services who know the children etc). Take a final decision. Draw up an action plan to close the case, with timeframes, roles and responsibilities.

The Head of Division involved is in charge of the *Response Team*.

The coordinating and supervising of the action plan are the responsibility of the National Focal Point.

After establishing the degree of urgency and timeframe, the *Response Team* can decide to:

- 1) act on the basis of the information received, which has been reported in detail and assessed;
- 2) plan an external inquiry, coordinated by the National Focal Point, with the sole aim of obtaining the necessary details or additional elements in order to be able to take any subsequent decisions in an informed way that is fair to everyone involved;

In both cases it will proceed to:

guarantee the immediate involvement of the parents or guardian of the child suspected of abuse and of the child victim, unless this is not in their best interests;

discuss and reach an agreement with the Head of Division on eventual measures to lessen the risk to and protect children who have been the subject of a complaint (including the suspected perpetrator);

seek, at any stage during the assessment, the opinions of one or more previously identified external experts (from the public sector or third sector).

### STAGE VI

The *Response Team* will reach a decision based on the information already in its possession or after an external investigation. When deciding on how to proceed, special consideration will be given to the age of the young abuser (as s/he may also be charged with a criminal offence), the seriousness of the case and whether the child is in the care of the social services or has been punished by the juvenile court.

In cases where children are the abusers, it is fundamental to reach decisions together with external experts (from the public sector or third sector).

The *Response Team* can:

- a) decide to mitigate or play down any concerns when, following an initial assessment, important details are not confirmed;
- b) consider reporting the young abuser to the social services (to protect all the children involved, and prevent further abuse and provide support without involving the judicial authorities);
- c) decide whether to report the young abuser not only to the social services, but also to the public prosecutor of the juvenile court or the law enforcement agencies; this decision must first be approved by the Management and carried out adopting the best practices for the safeguarding of the accused child.

### STAGE VII

All records and documentation will be stored securely by the National Focal Point for the duration of the case and shared, in the strictest confidence, only on a strictly "need to know" basis.

### STAGE VIII

Adequate feedback and support will be provided for all those involved until the case has been closed.

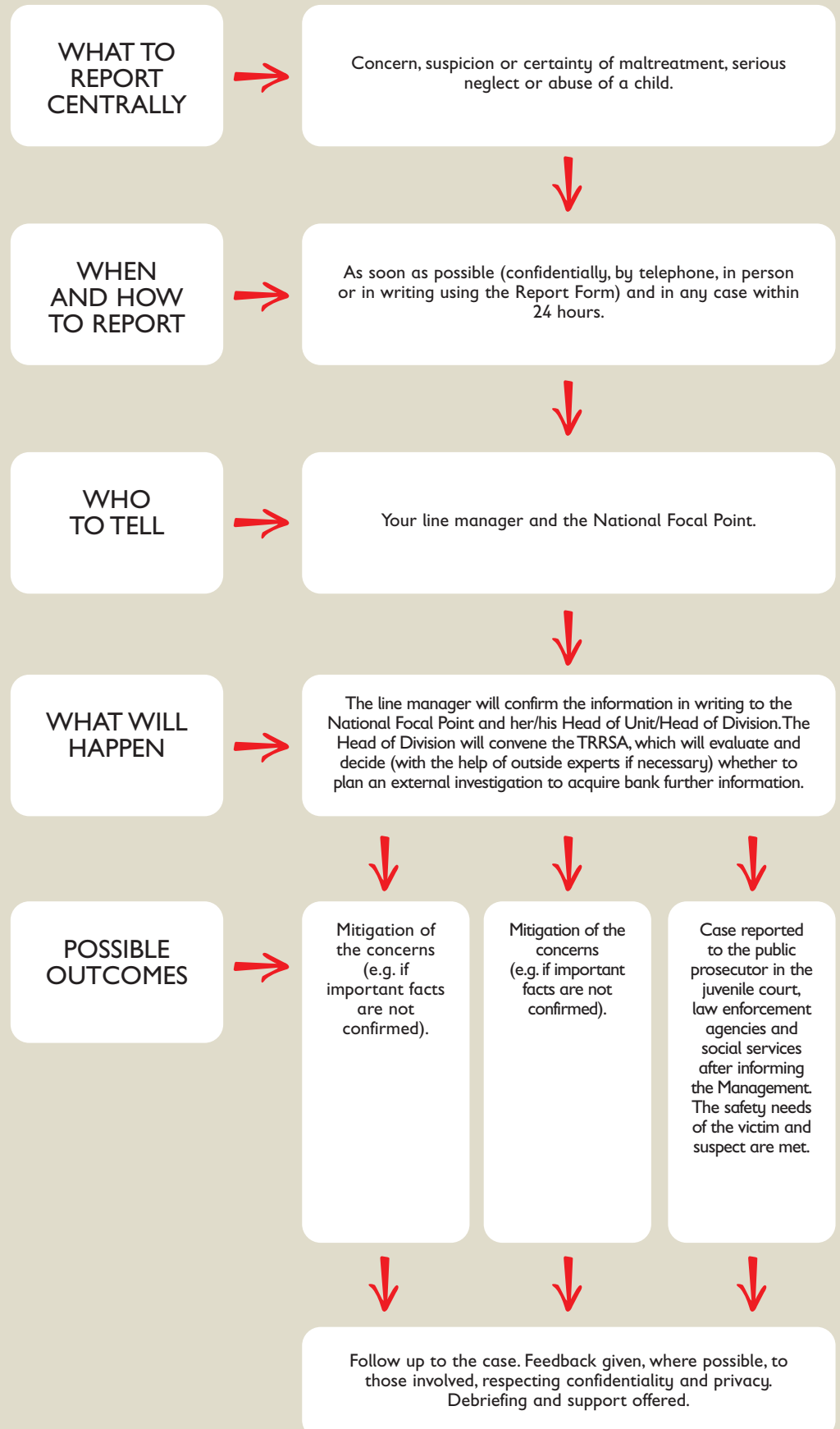
### STAGE IX

Registering of all complaints centrally and general anonymous information on the complaints sent to the Heads of Division and the representative of the Governing Board (on a six-monthly basis).

## FLOW CHART- CASE 5

**Suspected abuser:** child beneficiary of Save the Children or external child.

**Whistle-blower:** staff or representative of Save the Children or partner; a child beneficiary or visitor.



## **7. APPENDICES**

### **I. Acceptance of the Policy, Code of Conduct and Procedure by the staff and representatives Save the Children and its partner organisations**

(Declaration of Acceptance – Appendix 1)

The staff of Save the Children and its representatives or visitors must accept the Policy and adhere to the Code of Conduct and Procedure. So must the staff of partner organisations and their representatives.

### **II. Definition of the Key Contact Details for the staff of Save the Children**

(Key Contact Details - Appendix 2)

### **III. Registering a report**

To be used by both the staff of Save the Children and the staff of partner organisations or their representatives

(Report Form – Appendix 3)



## APPENDIX 1 - GENERAL PROCEDURE

# Declaration of acceptance

I confirm that I have received and read, and, therefore, AGREED TO SIGN for the entire duration of my collaboration with Save the Children Italy (or participation in the activities of Save the Children Italy or in activities carried out by one of its partner organisations):

- *the Child Safeguarding Policy and the Code of Conduct (December 2019);*
- *the General Procedure for Child Safeguarding (December 2019).*

I also acknowledge that the contents of those documents may be added to or altered at any time at its absolute discretion by Save the Children Italy. To this effect I declare and warrant to accept as of now unconditionally any such changes and additions and to add here to them.

Name and Surname: .....

Position<sup>8</sup> held and project/activity<sup>9</sup>: .....

.....

.....

City: .....

Legible signature: .....

Date: .....





## APPENDIX 2 - GENERAL PROCEDURE

# Key Contact Details

Name: .....

Surname: .....

Organisation: .....

Position: .....

Line manager: .....

Name .....

Surname: .....

Position: .....

Tel: .....

E-mail: .....

Place of work: .....

.....

Next level manager: .....

Name .....

Surname: .....

Position: .....

Tel: .....

E-mail: .....

Place of work: .....

.....

### CSP Allegation and Support

segnalazioni.csp@savethechildren.org

Dedicated cell phone  
H24-7 / 7days  
**345.9544926**

### SAVE THE CHILDREN ITALY

**Child Safeguarding  
Policy manager**

(acting as **National Responsible and  
Focal Point for Child Safeguarding**)

Laura Lagi

Contact details

Office 06.48070002

Cell. 340.1399514

e-mail [laura.lagi@savethechildren.org](mailto:laura.lagi@savethechildren.org)

**APPENDIX 3 - GENERAL PROCEDURE**

# Report Form

**CONFIDENTIAL**

---

Programme/Place:

Name and Surname of the child:

**Details of the report:**

Date:

Times:

Place:

**Details of the person making the report:**

Name and surname:

Address:

Main telephone no.:

Secondary telephone no.:

Occupation:

Relationship to the child:

**Details of the child:**

Details of the child:

Name and surname:

Age:

Date of Birth:

Gender:

Address:

Reception facilities:

School:

Class:

Teacher:

Nationality:

Language spoken:

Religion:

Disability (if "yes" please provide details):

Person responsible/guardian:

---

**Recent changes in the child's behaviour:**

---

**Details of the alleged abuse: who, what, where and when**

---

**Of the suspected perpetrator (if known):**

Name and Surname: .....

Address: .....

Age: .....

Date of birth: .....

Occupation: .....

Type of work: .....

Relationship to the child: .....

Presumed current whereabouts  
of the suspect: .....

---

**Present safety of the child (include information regarding whether the place in which s/he is staying is safe, whether there are risks of any kind, whether s/he has expressed any fears that should be considered etc)**

---

**Was emergency medical treatment requested for the child?**

If "yes" , please indicate who the request was made to (service, names of staff and contact details) and whethertreatment has already been given (where, which service, names of staff and contact details):

.....

---

**Who else knows about the case?**

Agency, body, organisation or other:

.....

Member of the family or others (please specify):

.....

---

**Action taken so far** (e.g. case reported to the judicial authorities, the social services, other. Please specify place and date, action taken, persons involved and their contact details)

---

**Complaint details provided by:**

(if it is the same person who made the complaint, there is no need to fill in this box)

Name:

.....

Role and place:

.....

Date:

.....

Signature:

.....

---

**THIS SECTION IS TO BE FILLED IN BY THE LINE MANAGER WHO RECEIVED THE REPORT**

Name: .....

Position: .....

Place: .....

---

**Date and time report received:**

---

**Action taken by the line manager:**

---

**Is there any connection between the alleged abuser and Save the Children or its partners?**

---

**1 Should the case be dealt with using external procedures, in other words, is there any connection between the case and Save the Children Italy or a partner? (Yes/No and please specify):**

---

**2 Should the case be dealt with using internal procedures (Yes/No and please specify):**

---

**Are any eventual decisions already taken by the line manager in line with the Policy and relative Procedure for Child Safeguarding? (please supply details)**

---

**Were the judicial authorities involved? (Yes/No, please specify why)**

---

**Were public authorities for the protection of children involved? (Yes/No, please specify why)**

---

**What other action was taken to ensure the safety of the child?**

---

**Was medical treatment requested?**

---

**Date and time the child was sent for/received medical treatment:**

---

**Signature of the line manager**

## NOTE

- <sup>1</sup> They must also immediately inform their line manager and National Focal Point.
- <sup>2</sup> Children can be abused by people they know or, more rarely, by people they do not know; within the family, in an institutional or community setting, or during procedures that cause real or potential harm to their health, survival, development or dignity.
- <sup>3</sup> The law n.1 of October 2012, from the ratification in 2007 of the Council of Europe Convention, a Convention for the protection of minors against sexual exploitation and abuse (Lanzarote Convention), dictates some rules to adapt the internal legal system through the modification of the penal code (introducing the new crimes of solicitation of minors, also through the Internet, instigation and apology of pedophilia and of child pornography), the criminal procedure code and the penitentiary system.  
It is important to remind that, according to art. 609 quater of the penal code, people who have sex with children under 14, commit a crime, as well as with 16 years old minors if they are the ascendant, the parent, even adoptive, or the cohabitant of the parent, guardian or other person to whom, for reasons of care, of education, supervision or custody, the minor is entrusted or having, with the latter, a domestic cohabitation.  
Moreover, outside the hypotheses of sexual violence (referred to the article 609-bis of the penal code), the ascendant, the parent, also adoptive, his cohabitant or the guardian who, by abusing the power connected to his/her position, has a sexual relation with a minor under age 16, is punished with the imprisonment from three to six years. It is not punishable the minor who engages in sexual acts with a minor who is 13, if the age difference among the subjects is not over than three years.
- <sup>4</sup> “Witnessed violence” is a form of child maltreatment, defined generally by the scientific literature as the child's exposition to physical and/or psychological violence, acted by a family member in harm of another family member (usually mother or siblings).  
The law 69/2019 "Amendments to the Criminal Code, to the Code of criminal procedure and other provisions in subject for the protection of victims of violence domestic and gender" also known as "THE RED CODE", has come into effect since the 09 August 2019.  
The main innovation, with reference to contrast to witnessed violence, is the express provision, under article 572 of the Italian Criminal Code, that a minor who witnesses violence and maltreatment on a family member is always a person offended by the crime.
- <sup>5</sup> The information sheet and the request for authorisation from the legal guardians of children attending the project/service run by Save the Children must always contain a specific reference to the existence of a Child Safeguarding Policy for child beneficiaries and a specific reference to the activities of the PREPARATORY PHASE in which the children will be involved.
- <sup>6</sup> At the end of every working day the box will be opened by the local project manager together with one operator. Consequently, the possible warning procedure will be activated.
- <sup>7</sup> Generally speaking the Criminal Code presumes that an adult is capable of consent. However, Article 98 states that imputability must be determined in each individual case for “children who were over 14 years of age, but not yet 18 when the acts took place”, while children under the age of 14 cannot be charged. In short, under Italian law, in order to press charges against a child under the age of 18, s/he must not be under 14 and the imputability must be determined in each separate case, deciding whether the person can be held responsible for the crime committed and therefore tried in a court of law.
- <sup>8</sup> Please state whether you are an employee, collaborator, adviser, volunteer, representative or trainee.
- <sup>9</sup> Please state the name of the project (e.g. "Fuoriclasse Project" – School and Education Unit) or area of activity (e.g. marketing, fundraising, Communication-campaign EveryOne etc) and any eventual partner organisation that is carrying out the project or activity for Save the Children Italy.





**NOTES**

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**NOTES**

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At Save the Children, we want every child to have a future. We work every day with passion, determination and professionalism in Italy and around the world to give children the opportunity to be born and grow up healthy, receive an education and be protected. When an emergency breaks out, we are among the first to arrive and the last to leave.

We work with local realities and partners to create a network that helps us to meet the needs of children, guarantee their rights and listen to their voice. We concretely improve the lives of millions of children, including those most difficult to reach.

**Save the Children, since more than 100 years, fights to save children at risk and guarantee them a future.**



**Save the Children**

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