



**STILL
I RISE**

**CHILD
SAFEGUARDING
POLICY**

STILL I RISE AREAS
WHERE THE DOCUMENT
IS IMPLEMENTED



GLOBAL
ALL PROGRAMS

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Still I Rise provides education and social development opportunities to children around the world. As children living in vulnerable contexts, the students Still I Rise serves require exceptional support and protections. This Child Safeguarding policy has been designed to enable all those involved with Still I Rise to support and protect children. The following safeguarding policy is catered to the different areas where Still I Rise operates as well as the students we serve.



Michele Senici

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SECTION 1 | DEFINITIONS

1. Caregiver: any person (i.e.: parent, guardian, relative) who is legally responsible for a child.
2. Child or Children: Anyone under 18 years of age.
3. Child Protection (CP): child protection is making the world safe for children. It is an area of work aimed at protecting children from all forms of abuse and exploitation in all regions of the world by following country-specific procedures in preventing and responding to abuse.
4. Child Safeguarding & Protection Manager (CSPM): The individual appointed by Still I Rise to enforce the rules of the present document, oversees the CSP related training and oversees the follow up of cases arising from the violation of the Child Safeguarding Policy.
5. Child Safeguarding & Protection Officer (CSPO): The person present at every Program who is responsible for the implementation of the child protection program in our safeguarding policy and follows every child that requires special attention. He or she is especially qualified to run targeted activities relating to psychology, education, pedagogy, child protection, social welfare, etc.
6. Child Safeguarding (CS): policies, procedures and practices to ensure that Still I Rise is a child-safe organization. It involves collective and individual responsibility and preventative actions to ensure that all children are protected from deliberate or unintentional acts that lead to the risk of or actual harm by Still I Rise representatives and guests.
7. Guest: Any individual that is not a representative, such as a visitor or a journalist, who is invited or requests to visit any of Still I Rise's Schools or partake in any event or activity sponsored by Still I Rise.
8. School Principal or Program Manager (SP/PM): The person appointed by Still I Rise to manage one of Still I Rise's Programs around the world.
9. Representative: directors, managers, coordinators, officers, teachers, volunteers, auxiliary staff, consultants, strategists, specialists who interact with or have sensitive information belonging to children in the framework of Still I Rise's Schools.
10. School: Any formal or informal educational program (i.e: International School, emergency school, cultural center, community center) operated by Still I Rise at any location.
11. Still I Rise (SIR): The entity that coordinates all operations, programs and Schools of Still I Rise worldwide, headquartered at Via Adelaide Ristori 44, 00179 Rome.
12. Student: any child that has been enrolled in any of Still I Rise's Schools.

SECTION 2 | PURPOSE & AIM OF THIS POLICY

Still I Rise is an international charitable body founded in 2018. Its goal is to educate, safeguard and protect refugees and children living in vulnerable contexts. Its registered head offices are in Rome and its charitable work is currently based in Greece, Turkey, North West Syria, Kenya and the Democratic Republic of Congo. Still I Rise is also active in Italian-speaking Switzerland.

The main beneficiaries of SIR's operations are minors. SIR strives to protect children from any form of abuse.

With this in mind, the purpose and aim of this policy is to protect children from abuse and the fear of abuse of any kind by implementing measures that seek to prevent such activity and by establishing a reporting system that responds to any situation effectively.

For the purposes of this policy we define Child Abuse as anything which individuals, institutions or processes do or fail to do which directly or indirectly harms students or damages their prospect of safe and healthy development into adulthood.

The main categories of Child Abuse are Physical Abuse, Emotional Abuse, Neglect/Negligent Treatment, Sexual Exploitation & Abuse and Exploitation.

- a. Physical Abuse: Non-accidental use of physical force that inadvertently or deliberately causes a risk of or actual injury or suffering to a child. Physical force includes but is not limited to hitting, shaking, kicking, pinching, pushing/pulling, grabbing, burning, female genital mutilation, torture, and other physical acts. Physical injury or suffering may include but is not limited to bruises, marks, soft tissue swelling, hematomas, fractures, sprains, dislocation, burns, damage to organs, death, permanent disfigurement, and any other non-trivial injury.
- b. Emotional Abuse: Harm to a child's emotional, intellectual, mental or psychological development. This may occur as an isolated event or on an ongoing basis. Emotional abuse includes but is not limited to any humiliating or degrading treatment (e.g. bad name-calling, threats, yelling/screaming/cursing, teasing, constant criticism, belittling, persistent shaming, etc.), failure to meet a child's emotional needs, and rejecting, ignoring, terrorizing, isolating or confining a child.
- c. Neglect/Negligent Treatment: The failure to meet a child's basic physical and/or psychological needs either deliberately or through negligence. Neglect includes but is not limited to failing to provide adequate food, sufficient or seasonally-appropriate clothing and/or shelter; failing to prevent harm; failing

to ensure adequate supervision; failing to ensure access to appropriate medical care or treatment or providing inappropriate medical treatment (e.g., administering medication when not authorized). It can also include failing to provide a safe physical environment (e.g., exposure to violence, unsafe programming location, unsafe sleeping practices, releasing a child to an unauthorized adult, access to weapons or harmful objects, failing to child-proof a space that children will occupy, etc.).

- d. **Sexual Exploitation & Abuse (SEA):** All forms of sexual violence and coercion, sexual solicitation, manipulation or trickery including incest, early and forced marriage, rape, involvement in or exposure to indecent images/video (aka pornography), sexual slavery/trafficking, and statutory rape. Sexual abuse may include but is not limited to indecent touching or exposure, explicit sexual language towards or about a child and grooming. Sexual abuse does not always involve touching. Sexual Exploitation is any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes including but not limited to profiting monetarily, socially or politically from the sexual exploitation of another. Be aware that technology is a tool sometimes used to sexually exploit a child. The sexual exploitation and abuse of children under the age of 18 is child abuse and a policy violation. It may also constitute a criminal offense, depending upon the age of consent and local laws. Grooming is the process in which an adult builds a relationship with a child or the child's caretaker to gain the child's or the caretaker's trust for the purposes of sexually abusing and/or exploiting the child. Grooming typically occurs in phases, and it can happen online or face to face, by a stranger or by someone the child or caretaker knows. Since it is a gradual process, it can sometimes be difficult to detect. Here are a few indicators that an adult may be grooming a child or his/her caretaker: favoring the child over others, providing the child with rewards or privileges, isolating the child from others, expressing interest in a child who is particularly vulnerable or in need of support (e.g. previous abuse of the child by another), befriending the caregivers who are responsible to protect the child, providing the child with alcohol or drugs, building intimacy (i.e., having inside jokes or telling the child that nobody understands him/her like the groomer does), threatening, blackmailing, intimidating, or scaring a child by saying the groomer will do something to the child's family or friends.

- e. **Exploitation:** The actual or attempted abuse of a position of vulnerability, power differential, or trust for the benefit of the individual leveraging their position, power, privilege, or wealth (through enticement, manipulation, coercion or trickery) to engage a child in labor, domestic servitude, forced criminality, soldiering or organ harvesting. Typically, the person(s) exploiting a child does so in order to profit monetarily, socially, or politically. It can happen to one or a group of children, in the community of origin, outside of the

community, or internationally. The exploitation of a child may include but is not limited to: domestic servitude (e.g., cleaning, childcare, cooking, etc.), forced labor (commonly in factories or agriculture), forced criminal activities such as pickpocketing, begging, transporting drugs, manufacturing drugs, selling pirated merchandise, used for benefit fraud, forced to become a child soldier or join a gang.

- f. Trafficking: Trafficking in persons is defined by the United Nations as recruitment, transportation, transfer, harboring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation

Thus, the purpose and aim of this policy is to protect children from fear of abuse of any kind by employing measures that seek to prevent such activity and by establishing a reporting system that responds to any situation effectively.

SECTION 3 | SCOPE OF THIS POLICY

SIR wants to provide a child safeguarding policy that is specific to the needs of the students it serves. This Safeguarding Policy is designed to protect any child who enters SIR's Schools and all people who are in contact with the children.

All adults working with SIR as representatives (managers, coordinators, teachers, volunteers) as well as all other adults coming into our spaces as guests, are required to comply with this policy.

In addition to providing education and self-development activities to our beneficiaries, it is our belief that students need a safe physical and psychological environment.

SIR wants its Schools to be welcoming places for every student regardless of their gender, disability, sexual orientation, ethnicity or religion.

SECTION 4 | LEGAL FRAMEWORK

This policy has been drawn up on the basis of relevant legislation, policy and guidance that seeks to protect children in the international context and in the European Union.

It is based on the “UN convention of the right of the child (1989)” but also on the following acts and decisions concerning child protection and safeguarding drafted by European Union authorities:

- European Union Directives and Laws
- Council of Europe convention on actions against the trafficking in human beings (2005)
- Council of Europe convention on the protection of children against sexual exploitation and sexual abuse (2007)
- European Commission relevant Communications, Resolutions and Actions Plan, especially the “EU agenda for the rights of the child” (2011)

SIR may amend or supplement the present document to include any relevant regulatory development which may affect SIR's operations in any of the areas where SIR is active.

SECTION 5 | ACTIONS TAKEN

In order to accomplish the goals of the CS Policy, SIR commits to:

I. VETTING REPRESENTATIVES

SIR will only recruit representatives for its schools who are suited to work with our students.

All applicants will undergo a strict vetting process as defined in the Human Resources Policy. The process may include confirming the candidate's identity, obtaining references, conducting interviews and completing Background Record Check (CRB), which SIR may perform on all applicants anytime at its own discretion, to ensure robust safety standards.

II. IMPLEMENTING A GUEST POLICY

Any guest wishing to visit any of SIR's Schools may be approved by the SP/PM that will appoint a guest supervisor for the duration of the guests' visit. The supervisor is responsible for:

- a. Informing the guest on SIR CS Policy
- b. Presenting the Code of Conduct (Guest Form) to the Guest and ensure proper execution of the document
- c. Accompanying the guest throughout all of their visit to a School

III. TRAINING REPRESENTATIVES

All SIR representatives will follow a training procedure in relation to CS Policy before commencing their work with students.

This training informs representatives of the CS Policy, general advice, and basic procedures that must be followed during their working period. This training is conducted by the CSPM or CSPO or any person appointed by the CSPM at any of the Schools where the representative will engage in activities.

CSPO are responsible for the application and enforcement of the CS Policy, under the supervision of the CSPM and are responsible for effecting the Code of Conduct (representative form) with the representatives after their training at the School.

IV. ENSURING APPROPRIATE BEHAVIORS ARE IN PLACE

SIR defines the following principles as the foundation of representatives and guests relationships with students:

- a. Treat all students with dignity, respect and fairness, equally and without preferential treatments.
- b. Acknowledge that students could have had traumatic experiences and are dealing with the repercussions.
- c. Never subject or threaten the students to any form of Child Abuse.
- d. Define and respect boundaries between them and the students to avoid emotional dependency.
- e. Never engage in any kind of personal relationship with students including physical or sexual relations.
- f. Never exchange or offer or imply an offer to the students of money, goods or services.
- g. Not to carry out activities or actions that may be misconstrued, illegal or offensive, including on behalf of, or in accordance with, a student.

All representatives and guests commit to sign a Code of Conduct (representative or guest form) in which the above-mentioned principles are listed, expanded, described and contextualized into practice.

V. INFORMING THE HR DISCIPLINARY POLICY

The Disciplinary Policy of SIR, developed and updated by the Human Resources department, includes a chapter concerning CS violations, which are categorized into minor and gross misconducts.

Investigation and decision making regarding minor or gross child safeguarding related misconducts will be made according to the procedures and guidelines stated in the Disciplinary Policy.

Representatives by signing the Code of Conduct acknowledge the above-mentioned practices as stated in the Disciplinary Policy.

VI. IMPLEMENTING A WHISTLEBLOWING PROCEDURE

In the event that a person witnesses or reasonably suspects or is informed about any wrongdoing on the part of any representative or guest, they shall:

- a. Promptly remove themselves and the student from the dangerous/abusive situation: take the student to a safe space and immediately call for the CSPO to attend to the student.
- b. Consciously collect relevant information about the danger or the abuse: they take note about where the danger or abuse took place, the time, the name of all the people involved and what they have been witnessing. They avoid asking any questions or information to any child involved in the danger or abuse, this will be a CSPM responsibility.
- c. Report to the SP/PM any suspicious activity within the next 24 hours, in accordance with the procedure laid out below:

Normal case procedure

- a. The person who submits the report must formally notify the SP/PM, either in a scheduled meeting or in writing.
- b. The SP/PM informs the whistleblower regarding the procedures that will follow as stated in the Disciplinary Policy.
- c. They also ask the whistleblower if they prefer their identity to be kept confidential or not. If the whistleblower requires confidentiality the SP/PM will inform them that their identity will be kept confidential, unless otherwise required by law.

- d. The SP/PM records the report in writing on the designated “Report Record Form”.
- e. The procedures stated by the Disciplinary Policy are implemented.

Special case procedures

- a. If a SP/PM witnesses a violation of the CS Policy, it is his or her duty to report to the Program Director, who must then follow the normal procedure.
- b. In the event that a person needs to report a SP/PM, they shall report them to the CSPO who will coordinate the whistleblowing procedure with the Program Director.
- c. If the reported person is the Program Director, the HR Manager or any other person that may be involved in the whistleblowing procedure, it is a SP/PM’s responsibility to guarantee that the reported person won’t be involved with the whistleblowing procedure.
- d. In the case a student or a caregiver needs to report a child safeguarding abuse, SIR shall make sure that the whistleblower is supported, protected and guided throughout the process with the highest degree of care. Representatives are informed about this requirement during the relevant training sessions.

Training

It is a CSPM or CSPO or any person appointed by the CSPM at any of the Schools responsibility to deliver a presentation of the Whistleblower Policy to all representatives before they start working with the students.

Support plan

It is the responsibility of the CSPM and CSPO to create and implement an individual support plan for the student victim of abuse that may include the involvement of the caregivers and/or support from external partners or institutions.

VII. PLANNING COMMUNITY AWARENESS ACTIVITIES

SIR believes it is crucial to empower all the community members of its schools, especially students and caregivers, by informing them about their rights and any form of abuse that children may have experienced.

SIR works to make sure that every student feels safe and comfortable in its Schools to talk about any concern they may have or about any abuse they may have suffered or otherwise witnessed.

For the same reason, Child Awareness Strategies and Caregiver Awareness Strategies are developed and implemented.

Child Awareness Strategies

To inform students about their rights, the topic of Child Abuse and the whistleblowing procedure, in every School SIR strives to:

- a. Create a child-friendly version of the CS Policy in English and in the language spoken within the area where the School is operating.
- b. Present the CS Policy to the students through workshops, lessons and activities.
- c. Plan for recurring workshops, lessons and activities to keep the students informed and aware of this Policy.
- d. Display in central areas of each School (i.e.: entrance, common hall, dining hall, corridors) visual and child friendly posters about this Policy and the whistleblowing procedures.
- e. Hire and train a CSPO for each School to support the students in understanding and effecting this Policy.

Caregiver Awareness Strategies

To inform caregivers about children's rights, the topic of Child Abuse and the whistleblowing procedure, in every School SIR strives to:

- a. Meet the caregivers and sign a Co-Educational Pact that rules the relationships between the caregivers, the students and the School and that includes information regarding the CS Policy.
- b. Present the CS Policy to the caregivers through workshops, and activities.
- c. Plan for recurring workshops and activities to keep the caregivers informed and aware about this Policy.
- d. Display in central areas of each School (i.e.: entrance, common hall, dining hall, corridors) visual and child friendly posters about this Policy and the whistleblowing procedures.
- e. Hire and train a CSPO for each School to support the caregivers in understanding and effecting this Policy.

VIII. PROTECTING PERSONAL DATA AND INFORMATION

It is SIR's priority to protect the student's personal and social data and information. This may include but is not limited to: pictures of their face, voice, name, surname, age, date and place of birth, nationality, medical conditions, schooling, family or social relationship, legal situation, sexual orientation, affiliation with religions, faith or political parties.

For the same reason, a Data Protection Policy is developed and implemented by the Operations Department.

SIR considers social media communication as a delicate environment where the protection of student's personal data and information may be jeopardized.

Therefore a Social Media Policy is developed and implemented by the Advocacy and Communication department.

IX. DEVELOPING CHILD PROTECTION POLICIES

It is SIR's priority to protect the students it serves. SIR enforces child protection and advocacy policies at all its centers of operations. More information regarding the child protection policy of specific Programs can be provided on request.

X. ENSURING SECURITY AND SAFETY IN OUR WORKING PLACES

Safeguarding students also means making sure that the environment, facilities and buildings where SIR's Schools operate are safe and respect international standards of fire, structural and health security.

Therefore, policies on buildings' safety measures, fire and earthquake and first aid are developed and implemented by the Programs Management department.

SECTION 6 | POLICY REVIEW

This policy will be reviewed annually during the month of October at board and management levels. This review will take into account new legal and regulatory developments in order to ensure good practice.

SECTION 7 | DOCUMENTS, FORMS AND MATERIALS

To assure that the Policy is applied efficiently and consistently, SIR develops documents, forms and presentations to be used by representatives to promote, check and apply the CS Policy.

Training Materials

CS Training for Representatives

A general and punctual training on this policy.

Additional Policies and Procedures

Child Protection Policy

A specific policy is designed for each SIR Program.

Data Protection Policy

Policy on how SIR protects personal data and information.

Disciplinary Policy

It includes procedures and guidelines for investigating and decision-making regarding CS concerns.

Human Resources Policy

Specific procedures are designed for each SIR existing Representative position.

Policies on security and safety

Buildings' safety, fire and earthquake prevention, response, and first aid.

Social Media Policy

Policy on SIR's communication on social media.

Documents

Code of Conduct (guest form)

A specific document is provided for each SIR Program.

Code of Conduct (representatives form)

A specific document is provided for each SIR Program.

Report Record Form