

CHILD PROTECTION POLICY

Fondazione Gli Amici di Luca Casa dei Risvegli Luca De Nigris ETS

1. Purpose and scope

Fondazione Gli Amici di Luca Casa dei Risvegli Luca De Nigris ETS recognises that every child has the right to protection from any form of violence, abuse, exploitation, neglect, discrimination and harm.

For the purposes of this Policy, a **child is any person under the age of 18**.

This Policy applies to staff, collaborators, consultants, volunteers, trainees and any other person acting on behalf of the Foundation who may come into contact with children in the course of its activities.

It also applies to activities carried out within the project “**Awakening Rights – From Acquired Brain Injury to the Charter of Fundamental Rights**”, including activities involving schools, students, young people, families and participants under the age of 18.

The Policy is structured according to the four areas of the **Keeping Children Safe – International Child Safeguarding Standards**:

1. Policy
2. People
3. Procedures
4. Accountability

2. Fundamental principles

The Foundation is guided by the following principles:

- all children have an equal right to protection from harm;
- the best interests, dignity, safety and well-being of the child must be given primary consideration;
- no child shall be discriminated against on the basis of gender, ethnic origin, religion, disability, sexual orientation, socio-economic condition or any other personal circumstance;
- children should be listened to and, where appropriate, involved in decisions affecting them;
- activities must be organised according to the principle of **do no harm**;
- child protection is a responsibility of the whole organisation;
- families, legal guardians and children must receive appropriate and understandable information about activities involving them;
- safeguarding concerns must be taken seriously and managed promptly and confidentially.

3. Organisational responsibility and Child Protection Focal Point

The Foundation is responsible for implementing this Policy and ensuring that its principles are applied in activities involving children.

The Foundation appoints:

Elena Merlini
Child Protection Focal Point

The Child Protection Focal Point is the internal reference person for child safeguarding matters.

Her role includes:

- supporting the implementation of this Policy;
- providing guidance to staff, collaborators and volunteers;
- receiving safeguarding concerns or reports;
- supporting the appropriate management of any safeguarding issue;
- referring matters, when necessary, to the competent services or authorities;
- promoting awareness of child protection procedures within the organisation.

The Child Protection Focal Point does not replace public authorities, social services, healthcare professionals or law enforcement agencies.

The President and Legal Representative of the Foundation retains overall organisational responsibility for compliance with this Policy.

4. People: recruitment, suitability and conduct

The Foundation shall take reasonable and proportionate measures to ensure the suitability of staff, collaborators, trainees and volunteers who may have direct and non-occasional contact with children.

For roles involving **direct and regular contact with children**, the Foundation shall apply appropriate vetting measures, in accordance with applicable law and proportionate to the role. Such measures shall include, where required or legally permitted:

- verification of professional experience and references;
- verification of suitability to work with children;
- appropriate **background checks and vetting**;
- information on the Foundation's safeguarding principles and procedures;
- acceptance of the standards of conduct set out in this Policy.

Persons acting on behalf of the Foundation must:

- treat children with dignity and respect;
- maintain appropriate professional boundaries;
- avoid humiliating, discriminatory, intimidating or inappropriate behaviour;
- avoid unnecessary situations in which an adult is alone with a child;
- respect the privacy of children and families;
- immediately report any safeguarding concern.

Any form of physical, psychological or sexual abuse, exploitation or inappropriate relationship with a child is strictly prohibited.

5. Procedures and risk prevention

Before activities involving children are carried out, the Foundation shall consider any relevant safeguarding risks and adopt appropriate measures to minimise them.

Particular attention shall be paid to:

- the age and vulnerability of participants;
- disability and communication needs;
- adequate adult supervision;
- the location and organisation of activities;
- one-to-one contact;
- use of photographs, video and digital communication;
- collection and processing of personal data;
- participation of external partners or professionals.

For activities carried out with schools, the Foundation shall cooperate with teachers and school staff and respect the supervision and authorisation procedures established by the educational institution.

6. Consent, personal data and images

Where required, participation of minors in activities shall take place with the appropriate informed consent of parents or legal guardians.

Children shall receive information about activities in a manner appropriate to their age and understanding and, where possible, their own assent shall also be sought.

Personal data concerning children shall be collected and processed only where necessary and in accordance with **Regulation (EU) 2016/679 – GDPR** and applicable national legislation.

Images, photographs or video recordings allowing a child to be identified shall not be published or disseminated without the necessary authorisation of the person exercising parental responsibility.

The dignity, privacy and safety of the child shall always be respected.

7. Reporting and management of concerns

Any person acting on behalf of the Foundation who:

- witnesses behaviour that may place a child at risk;
- receives a disclosure from a child;
- receives information concerning possible abuse or harm;
- has reasonable grounds for concern about a child's safety or well-being;

must promptly report the concern to the **Child Protection Focal Point, Elena Merlini**, or, where this is not possible or appropriate, to the President and Legal Representative.

The person reporting a concern is not responsible for investigating whether abuse has occurred.

The Foundation shall:

- give priority to the safety and best interests of the child;
- document the concern appropriately;
- preserve confidentiality;
- involve the competent professional services or public authorities where necessary;
- act without delay where an immediate risk is identified.

The Foundation shall not conduct investigations falling within the responsibility of the competent public, judicial or law enforcement authorities.

8. Training and awareness

Staff, collaborators, trainees and volunteers involved in activities with children shall receive **appropriate safeguarding information and training before participating in such activities.**

The Foundation shall also ensure **periodic refresher training or briefing throughout the duration of relevant activities and projects**, proportionate to the nature and frequency of contact with children.

The Foundation shall promote continued awareness of child protection principles, reporting procedures and standards of conduct throughout the organisation.

9. Accountability, monitoring and review

The Foundation shall monitor compliance with this Policy and retain appropriate records of safeguarding measures where necessary.

Any significant safeguarding issue arising in connection with an EU-funded project shall be managed in accordance with the applicable project obligations.

This Policy shall be reviewed periodically and updated whenever necessary, including in the event of:

- relevant changes in legislation or safeguarding standards;
- organisational changes;
- new activities involving children;
- experience indicating the need to strengthen existing procedures.

The current version of this Policy shall be **publicly available and accessible through the Foundation's website and institutional communication channels.**

10. Adoption

Fondazione Gli Amici di Luca Casa dei Risvegli Luca De Nigris ETS adopts this Child Protection Policy and commits to applying its principles and procedures to all activities involving persons under the age of 18.

Organisation:

Fondazione Gli Amici di Luca Casa dei Risvegli Luca De Nigris ETS

Child Protection Focal Point:

Elena Merlini

Legal Representative:

Fulvio De Nigris
President

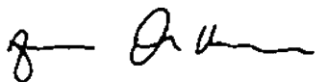
Place: Bologna

Date: 13 September 2026

Signature of the Legal Representative

Fulvio De Nigris

President and Legal Representative



GLI AMICI DI LUCA
CASA DEI RISVEGLI LUCA DE NIGRIS ETS
Via Dossetti, 12 A
40128 BOLOGNA



FONDAZIONE
GLI AMICI DI LUCA
CASA DEI RISVEGLI
LUCA DE NIGRIS