



CHILD SAFEGUARDING POLICY

General index

POLICY	2
1. ASIA’s mission and commitment to the safety of children and adolescents	2
2. Legal references.....	3
3. Definitions	3
4. Scope	4
5. Policy implementation.....	4
6. Roles and responsibilities	6
7. Revision.....	7
CODE OF CONDUCT	8
REPORTING PROCEDURE FOR CHILD SAFEGUARDING	10
1. Introduction.....	10
2. Guiding principles.....	10
3. Reporting process.....	10
ANNEX 1: Reporting Form.....	13
ANNEX 2: Main references and contacts	16

last review and approval: March 2024



POLICY

1. ASIA's mission and commitment to the safety of children and adolescents

ASIA works to safeguard the identities and the historical and cultural heritage of the peoples of the Asian continent, focusing in particular on the Himalayan areas. We promote sustainable development processes that place local communities at the centre, leveraging their human, cultural and environmental resources. We share the values of peace, respect and tolerance of the Himalayan cultural and spiritual traditions, which we consider the heritage of all humanity.

Throughout project implementation and in carrying out institutional activities, ASIA comes into direct and indirect contact with children and adolescents. Aware of the responsibility that we assume with our interventions, we consider it a priority to create and maintain a safe environment for children and adolescents. Through this Child Safeguarding Policy (hereafter the CS Policy), ASIA affirms its commitment to promoting child well-being, firmly condemning any form of abuse and exploitation and providing guidelines so that any minor who comes into contact with our organization is protected.

By implementing this CS Policy, ASIA undertakes to always focus on the best interests of minors and to respect the principles of non-discrimination, equality, transparency and confidentiality. Our organisation shall also make every effort to create and disseminate a culture of child protection in the communities where we work and among our stakeholders.

Aware that this commitment cannot be carried out by a single organization, ASIA, in executing this CS Policy, will actively seek collaborations with organizations, institutions, international agencies and other organizations (formal or informal) engaged in the promotion and defence of children's rights.

We believe that creating a safe environment for children is everyone's responsibility. All those who collaborate with or work for ASIA must fully be aware of the risks of child abuse and exploitation, how these situations can be prevented, and how to manage the reporting process.

Thus, this CS Policy is binding for all those who work for and with ASIA, including: the organisation's governing bodies (board of directors, members, etc.), staff and partners, volunteers, donors, journalists, testimonials and all those who have a formal relationship with the organisation (e.g. contracts, agreements, MoUs). All ASIA staff and all those acting on behalf of the organisation must adhere to the highest ethical standards of behaviour towards children and adolescents, as indicated in this CS Policy, both in their private and professional life.

We believe that measures to protect children from the risk of abuse and maltreatment must take into consideration the cultural and organisational context where we carry out our work. Yet, in no case will local culture and traditions be used as a justification for accepting any form of abuse or exploitation. Therefore, safeguarding procedures implemented by ASIA will be adapted to the specific local context and organisational structures of the onsite offices, without infringing the principles and standards established in the CS Policy.

Aware that the risk of child abuse, in any form, can occur in any context, ASIA considers it essential to establish common principles, rules and procedures within this CS Policy. These provisions will ensure the constant safety of the children who are project beneficiaries, and will allow the organization to react in a timely manner if any child is the victim of violence in any form.

In practice, the CS Policy aims to define the minimum standards that guarantee the aforementioned objectives

2. Legal references

Throughout ASIA's work with children and in this CS Policy, the organisation refers to the United Nations' Convention on the Rights of the Child – UNCRC (including additional protocols), approved by the General Assembly on 20 November 1989 and ratified by Italy with Law No. 176 of 27 May 1991. Further legislative references also taken into consideration are the national laws on child protection in the countries where ASIA operates, as well as the international conventions relating to child protection. An example is the Lanzarote Convention on the protection of minors against sexual exploitation and sexual abuse.

3. Definitions

The main definitions are given below:

- Minor: a person under the age of 18.
- Child abuse: any act that physically or psychologically harms a child or adolescent perpetrated by anyone (adult or minor), directly or indirectly causing damage or preventing a child or adolescent from growing up in a healthy and safe environment.
- Physical abuse: potential or actual physical harm or injuries to a child or adolescent perpetrated by another person (adult or minor). This includes striking, beating, kicking, shaking, biting, strangling, scalding, singeing, poisoning or suffocating.
- Psychological abuse: abuse that takes the form of repeated statements and behaviours carried out by those who, for various reasons, are the caretakers for the child or adolescent. This type of abuse has a high probability of causing harm to their wellbeing and their physical, mental, spiritual, moral and social development. This includes forced isolation, ongoing criticism and reproaches, apportionment of blame, verbal threats, intimidation, discriminatory attitudes, refusal and witnessing violence.
- Inadequate care: parents/caregivers' inadequate or insufficient care for the physical, psychological, medical and educational needs typical of the developmental phase of the child or adolescent in question. Said inadequacy is not due to economic difficulties or poverty; rather it stems from an inability or unwillingness to provide care. It includes negligence, age-inappropriate care and excessive care.
- Sexual exploitation: sexual abuse which involves children or adolescents in any type of sexual activity in exchange for money, gifts, food, hospitality or other benefits for the minor or their family. ASIA considers any sexual activity with a minor as form of abuse, regardless of their alleged consent.



- Child labour: for the purpose of this CS Policy, child labour refers to the worst forms of child labour. As defined by the International Labour Organization (ILO - Article 3, ILO Convention No. 182, 1999), this includes:
 - a) all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour, including forced or compulsory recruitment of children for use in armed conflict;
 - b) the use, procuring or offering of a child for prostitution, for the production of pornographic materials or pornographic shows;
 - c) the use, procuring or offering of a child for illicit activities and any work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.

4. Scope

This CS Policy (and annexed documents) applies to:

- ASIA's staff and collaborators (hired through any type of work or volunteering contracts) in Italy, including in local groups, and in the rest of the world;
- Members of ASIA's Board of Directors;
- Staff and representatives of partner organisations (in case they do not have their own child safeguarding policy) and any other individual or organisation that has a formal or contractual relation with ASIA and which involves contact with children and adolescents;
- Private donors and sponsors who visit our projects in Italy and abroad.

All aforementioned subjects must receive, fully understand and sign this Child Safeguarding Policy, which includes the Code of Conduct and the Reporting Procedure (including *Annex 1: Reporting Form* and *Annex 2: Main References and Contacts*).

5. Policy implementation

ASIA, as a group of people working for and sharing the values of peace, respect and tolerance, undertakes to comply with a minimum set of standards necessary to guarantee a safe environment for minors in the contexts in which it operates, particularly in the following ways:

Raising Awareness

ASIA commits to promote a culture of child safeguarding in the contexts in which it operates and with all stakeholders involved: local suppliers, public and private entities, communities, formal or informal community organizations, partners and direct or indirect project beneficiaries, both in Italy and abroad.

ASIA pledges to promote greater awareness of child abuse, maltreatment and exploitation and the risks associated with the organisations' work among all those involved in various capacities in project activities. Furthermore, the organisation will ensure that minors and their families are made aware, in the most appropriate ways, of the rules of conduct that they can expect from staff and representatives and of how to report alleged abuse.

Prevention



ASIA undertakes to create and maintain a safe environment where the rights of minors are always protected and where possible risks of abuse and inappropriate conduct are prevented. In particular, through:

- a. **Staff recruitment.** Throughout staff search, selection and recruitment, ASIA will respect the need to promote a safe environment for minors. In practice: a) job offers will include the adoption of the CS Policy; b) employment contracts and job descriptions will specifically cite compliance to the CS Policy; the Code of Conduct and the Reporting Procedure must be signed; and c) all staff and external collaborators carrying out activities in close contact with minors shall provide references and criminal background checks will be conducted according to laws in force in the country in question.
- b. **Training on Child Safeguarding, Code of Conduct and Reporting Procedures.** ASIA's staff will receive specific training on the CS Policy, the Code of Conduct and the Reporting Procedure. Staff training must be repeated periodically. This training will aim to develop the knowledge and skills necessary to fully implement the CS Policy, to comply with the Code of Conduct and to follow the Reporting Procedures. Where possible, and based on ASIA's ability, the organisation will aim to provide additional training and awareness-raising activities. Consultants and volunteers will also receive training with the same methods and objectives. While in terms of project partners, if expressly requested by them, ASIA may provide a short training on the basic principles and procedure of the CS Policy for their staff involved in activities with children.
- c. **Risk assessment and mitigation measures.** ASIA will carry out risk assessments for activities, projects and initiatives and will implement the necessary mitigation measures. Risk assessments, as well as mitigating actions, will be reviewed periodically.
- d. **Dissemination of child safeguarding measures.** ASIA will incorporate this CS Policy in its management processes and will explicitly mention the CS Policy, the Code of Conduct and Reporting Procedure in agreements, MoUs, contracts and protocols. Furthermore, partners, suppliers and other stakeholders will have to sign the CS Policy and related documents mentioned above.
- e. **Monitoring.** ASIA will create monitoring systems for the application of the CS Policy both in Italy and abroad, in order to be able to identify and implement improvement measures.
- f. **Communication and use of images.** ASIA will ensure that the safety of children and adolescents is not compromised in Communication and Fundraising activities, including when using images and videos.

Reporting and response to an alleged abuse or inappropriate conduct against a child or adolescent

ASIA has a straightforward and transparent procedure to report any suspected abuse, maltreatment or exploitation of a minor. The organisation also commits to appropriately train and sensitize staff and others who collaborate in various ways with ASIA on the appropriate use of such procedure.

ASIA pledges to ensure effective intervention in response to any report of suspected abuse or inappropriate conduct according to the following key principles:

1. Best interest of the minor involved;

2. Safety of girls and children;
3. Professionalism and confidentiality throughout the process;
4. Respect for the rights of all parties involved;
5. Access to competent authorities.

a. Reporting procedure. ASIA has specific and detailed reporting procedures in cases of suspected abuse, maltreatment and violation of the Code of Conduct. The Reporting Procedure document clearly outlines the guidelines for internal and external communications, roles, functions and responsibilities of the staff involved, and indicates when it is necessary to involve the competent authorities.

b. Case management. ASIA takes into serious consideration any report of abuse it may receive and guarantees a response in line with the severity of the allegation. For each Reporting Form received, the organisation shall respond in such a way that is adequate, timely and respectful of the dignity and rights of all parties involved. In the management of cases, the best interest of the minor will always be preserved, as well as the security, the rights and dignity of all parties involved.

c. Monitoring and updating system. ASIA will establish at a central level a monitoring system for case management in order to follow the progress of each case and at the same time have the possibility to conduct evaluations aimed at improving the CS Policy, the Code of Conduct and the Reporting Procedure. The entire case management, with the Reporting Form, must be documented in writing and securely archived, ensuring compliance with national legislation regarding privacy and confidentiality.

6. Roles and responsibilities

The Legal Representative (LR), or delegate thereof, is the person who is ultimately responsible for the implementation of this CS Policy. The LR ensures that all necessary measures are put in place for the promotion of a safe environment for children and adolescents.

The LR, or delegate thereof, establishes a Central Focal Point with the function of developing and applying this CS Policy in Italy, ensuring that it is also implemented in decentralized and local offices. In turn, the LR, or delegate thereof, in collaboration with the Central Focal Point, will delegate the responsibility of implementing the CS Policy to Local Focal Points in the various ASIA offices in Italy and abroad.

ASIA staff members (including the board of directors and other unpaid institutional positions), each according to their own functions and based on their position, have the responsibility to contribute to the full implementation of the CS Policy, as well as the promotion, in every ASIA project and initiative, of a safe environment for children and adolescents. All staff, volunteers, members and the members of the Board of Directors must fully understand and sign this CS Policy, the Code of Conduct and the Reporting Procedure. The behaviour of all personnel outside the working environment and hours must also be inspired by the principles of the CS Policy and the Code of Conduct.

Any alleged violation of this CS Policy, the Reporting Procedure or the Code of Conduct on behalf of ASIA staff will result in the application of disciplinary measures or sanctions in line with the organisation's internal regulations and legislation currently in force. Any actual violation of the CS Policy, the Code of Conduct or the Reporting Procedure constitutes a disciplinary offense, which may be sanctioned, in the most serious cases, with termination of the employment contract.



Through reporting and response management, ASIA and all its staff members, while respecting the criterion of transparency and legal obligations, will act based on the principles of fairness and confidentiality in order to protect the minors, their families and the staff involved.

7. Revision

ASIA periodically verifies the results obtained with the adoption of this Policy, the Reporting Procedure and the Code of Conduct and, if necessary, modifies, updates or integrates them.



CODE OF CONDUCT

This Code of Conduct, like the CS Policy, is based on ASIA's values of peace, respect and tolerance and on the general principles of the UNCRC.

This Code was developed to offer guidelines and guidance to any person working with ASIA. It outlines the behaviour to adopt in order to respect and promote the rights of children and adolescents. Specifically, the Code of Conduct aims to guarantee children their right to live in safety and security, without the risk of abuse or exploitation.

ASIA staff pledges to respect this Code of Conduct and to report any form of inappropriate behaviour. Serious violations of this Code will lead to the termination of the working relationship with ASIA. In case of a crime, the perpetrator will be prosecuted to the full extent of the law. For situations not specified in the present document, ASIA demands that each individual adopts a common sense approach, putting the minor's best interest above all else.

BY SIGNING THE CODE OF CONDUCT

I pledge to:

- 1) Treat children and adolescents equally and with respect, regardless of their age, sex, language, religion, opinion, nationality, ethnic or social origin, status, class, sexual orientation or any other status.
- 2) Promote a culture of communication and trust with children, their families, their communities, the volunteers and representatives of partner organisations, so that issues can always be shared and discussed.
- 3) Plan activities and organise the workplace in such a way as to minimise the risk of harm, taking into account the age and development of children.
- 4) Ensure, whenever possible, that one (or more) adult(s) is/are present and/or visible when I am in contact with a child.
- 5) Behave in a conscientious, responsible and respectful way to set a good example in any situation whenever possible.
- 6) Report immediately to the contact person indicated in the Reporting Procedure any suspicion or concern that goes against the principles of the CS Policy and the Code of Conduct, including any form of abuse of minors.
- 7) Obtain, where possible, the permission of children and their parents before taking photographs, videotaping or using the child's image; explain to children and their parents how the picture or messages will be used.
- 8) Observe the present regulations, while endeavouring to be sensitive and respectful of local customs and cultures, even if those norms and values may differ from the Code of Conduct. When necessary I will ask for support and advice from the LR and Focal Points.

I pledge *not* to:

- 1) Use any form of violence against minors (e.g. hitting, physically or verbally abusing).



- 2) Harbour attitudes towards minors that can negatively influence their wellbeing and development (also from a psychological point of view).
- 3) Act so as to shame, humiliate, belittle or scorn a minor or show disrespect for their cultural practices.
- 4) Involve anyone under the age of 18 in any form of sexual relationship, regardless of the legal age of sexual consent, the law and local customs. Being under any misconception concerning the child's age is not acceptable justification.
- 5) Exchange money, work, goods, services or humanitarian aid for sexual favours or act in ways that can put minors at risk of exploitation, maltreatment or abuse.
- 6) Establish or maintain continuous and/or frequent contact with beneficiaries of minor age using personal and direct communication tools (e.g. letters, e-mail, chats, social media networks, etc.). Only tools and professional environments made available by the organization, and which the organization is aware of, will be used.

I, undersigned,

declare to have received, read and understood the ASIA Child Protection Policy and I undertake to learn and agree to work in accordance with it. I understand that failure to comply with the Code of Conduct may result in the termination of my commitment with ASIA, or additional disciplinary and/or legal proceedings, as mentioned above. Furthermore, I declare that I have no criminal record regarding a crime against a minor (which I have not previously disclosed) and I know of no reason why anyone would consider me unfit to work with children or adolescents. In case of contract termination due to serious violations of child safeguarding principles, ASIA reserves the right to inform other institutions if they request professional references, in compliance with the legislative framework applicable to information protection.

Date Location

Sincerely,

.....

REPORTING PROCEDURE FOR CHILD SAFEGUARDING

1. Introduction

The purpose of the Reporting Procedure for Child Safeguarding (hereinafter CS Reporting Procedure) is to ensure that ASIA or partner staff members can report and address any concern, suspicion or certainty of a violation of the Code of Conduct or any abuse or maltreatment of any minor. This procedure guarantees that the reporting of any incident occurs in a timely and effective manner, respecting the principles of the CS Policy (of which this document is an integral part). This CS Reporting Procedure is binding for all those who, on behalf of ASIA, come into contact with underage beneficiaries of ASIA's projects, activities and initiatives.

The CS Reporting Procedure aims to guide and support all ASIA and partner staff and collaborators in handling and responding to cases of failure to protect minors. Any report received will be addressed in line with ASIA's disciplinary measures and within the context of current legislation. It is also crucial to note that any staff member or collaborator has the right to immediately press charges, on a personal basis, when she/he judges an incident to be a crime.

2. Guiding principles

When reporting and handling cases, ASIA will act according to the following guiding principles:

- The health and well-being of minors are the main priorities for ASIA, just as the protection of minors must be the most important consideration guiding the response to a reported incident.
- Any suspicion of abuse, maltreatment, exploitation or violation of the Code of Conduct must be reported immediately.
- Any decision taken during the reporting and response process must be based on the minor's best interests.
- The minor's point of view must be taken into consideration, as far as possible, and he or she should be informed of the decisions taken on his/her behalf.
- When dealing with a report, a timely, effective and appropriate response to each one must be guaranteed.
- Confidentiality must always be ensured, and information regarding each incident must be shared only with the persons necessary for the case management, in compliance with the provisions of the 2016/679 European Regulation. If the person making the report has any doubts about the processing of personal data, please contact info@asia-onlus.org to receive timely instructions.

3. Reporting process

What to report: a concern, suspicion or certainty of abuse or exploitation of a minor or a violation of the Code of Conduct on behalf of staff, volunteers, ASIA representatives or partners.

When to report an incident: as soon as possible and in any case within 24 hours of its occurring.

Who to report an incident to: to the Local or Central Focal Points (see Annex 2: main references and contacts).



How to report an incident: via the Reporting Form (see Annex 1).

What happens after an incident is reported: the Local or Central Focal Point (depending on the severity of the cases) sets up the procedure.

High profile cases

ASIA considers high profile all cases that:

- Compromise the well-being, health and safety of one or more minors;
- Significantly impact the organisation's strategy or the progress of a project/programme;
- Involve ASIA staff (both in Italy and abroad);
- Involve the staff of a partner organisation;
- Involve personnel from strategic stakeholders (such as schools, ministries, etc.);
- Have legal implications.

In all these cases, ASIA requires the involvement of the Central Focal Point.

Details of the process

PHASE 1

An ASIA or partner staff member (employee, volunteer, collaborator and consultant) receives a report or decides to report a suspected case of abuse, maltreatment or exploitation or a violation of the Code of Conduct. The staff member in question must **fill out a Reporting Form and send the document, within 24 hours, to the Focal Point**, or to her/his line manager who will in turn inform the Focal Point**.

**If the suspect of abuse is the Focal Point, the report must reach directly, or through the line manager, the Legal Representative (LR), or delegate thereof. In the event that the LR, or delegate thereof, is involved, the report must reach directly, or through the Focal Point, a specifically designated member of ASIA's Board of Directors.

Once the report is received, the Focal Point will evaluate if it is a high-profile case.

For high profile cases abroad:

- a. The Local Focal Point will take the necessary measures to guarantee the immediate safety of the minor and, if needed, of the person who reported the incident.
- b. The Local Focal Point will forward the Reporting Form to the Central Focal Point immediately, or within 12 hours of the incident being reported. The Central Focal Point will, in turn, inform the LR or delegate thereof.
- c. The LR, or delegate thereof, and the Central Focal Point will convene the Case Management Team composed of the Central Focal Point, the LR or delegate thereof, the Country Representative and the Local Focal Point. If necessary, the Area Officer (Desk Officer) and the Communications Manager will be informed.

For high profile cases in Italy:

- d. The Central Focal Point will take the necessary measures to guarantee the immediate safety of the minor and, if needed, of the person who reported the incident. The Central Focal Point will also inform the LR, or delegate thereof.
- e. The LR, or delegate thereof, and the Central Focal Point will convene the Case Management Team composed of the Central Focal Point, the LR or delegate thereof and the member of the board of directors in charge. If necessary, the Communications Manager will be informed.

PHASE 2

The **Case Management Team** will meet no later than 48 hours after receiving the Reporting Form to analyse the case in more detail and decide if it is necessary to:

- Evaluate other possible mitigating measures that have not already been carried out by the Focal Point at the local level;
- Initiate an in-depth investigation aimed at substantiating or acquiring the information necessary to be able to make any subsequent decision. This must be done in a motivated and appropriate manner for each person involved;
- Mitigate concerns when substantial evidence has not been found, after an initial objective verification;
- Apply any disciplinary measures against the person being reported for the incident;
- Report the case to Competent Authorities if considered necessary based on the details of the incident.

PHASE 3

The Central Focal Point will be in charge of drawing up an action plan to monitor the management of the Reporting Form and guarantee adequate feedback and support to the persons involved, until the case is closed.

In any case that does not meet the high-profile criteria, the Focal Point will direct the appropriate case management by relating with local agencies responsible for child safeguarding and in accordance with local legislation. If deemed necessary, the Focal Point can request the support of other ASIA staff members, as well as external consultants, always respecting confidentiality.



ANNEX 1: Reporting Form

Project/Location: _____

Name, surname and reference code of the minor (if any): _____

Report details:

Date: _____ Time: _____ Location: _____

Details of the person who reports the incident:

Name and surname: _____

Address: _____

Main phone number: _____

Other phone number: _____

Occupation: _____

Relationship with the minor: _____

Details of the minor:

Name and surname: _____

Age: ____ Date of birth: _____ Sex: ____

Home address: _____

School name and address: _____

Class attended: _____ Nationality: _____

Language(s) spoken: _____ Religion: _____

Health condition (if relevant, please provide details): _____

National ID number: _____

Legal guardian: _____

Details of the alleged abuser (if known):

Name and surname: _____

Address: _____

Age: _____ Date of birth: _____ Sex: _____

Employment: _____

Type of employment/position: _____

Relationship with the minor: _____

Assumed current location of the suspect: _____

Who else knows about the case?

Agency, Entity, Organisation, or other (please specify):

Family member(s), if other(s) please specify:

Actions undertaken:

Please specify the location, date, type of action carried out, subjects involved and their contact information (e.g. required medical intervention, reported incident to judicial authorities or to social services, other actions)

ANNEX 2: Main references and contacts 2023/24

Role	Name and surname	Contacts
CENTRAL FOCAL POINT	Linda Fidanzia	Mobile: +39 347 613 1625 E-Mail: l.fidanzia@asia-ngo.org
LEGAL REPRESENTATIVE (OR DELEGATE THEREOF)	Andrea Dell'Angelo	Mobile.: +39 06 4434 0034 E-Mail: a.dellangelo@asia-ngo.org
DESIGNATED MEMBER OF THE BOARD OF DIRECTORS	Roberto Zamparo	Mobile: 3356861252 E-Mail: zamparob@gmail.com
LOCAL FOCAL POINT (NEPAL)	Nabaraj Acharya	Mobile: +977 985 1103673 +977 980 8050425 E-Mail: n.acharya@asia-ngo.org
LOCAL FOCAL POINT (MYANMAR)	May Than Htoo	Mobile: +95 9428127498 E-Mail:m.thanhtoo@asia-ngo.org
LOCAL FOCAL POINT (MONGOLIA)	To assign	Mobile: E-Mail: