Fondazione Alfred Lewin

CHILD PROTECTION POLICY

Policy for the safeguarding and protection of children and young people under 18

Organization	Fondazione Alfred Lewin ETS
Registered office	Via Duca Valentino 11, 47121 Forlì (FC), Italy
Legal representative	Bettina Foa, President
Approval / entry into force	Date of signature by the Legal Representative

This policy is an organizational policy of Fondazione Alfred Lewin ETS. It applies beyond any single project and must be observed whenever the Foundation organizes, hosts or directly supports activities involving children.

1. Purpose, scope and principles

Fondazione Alfred Lewin ETS is committed to ensuring that every child who comes into contact with its activities is treated with dignity and respect and is protected from abuse, exploitation, neglect, discrimination, harassment and any other form of harm.

For the purposes of this Policy, a child is any person under the age of 18. The Policy applies to the Foundation's governing bodies, employees, collaborators, consultants, volunteers, trainees, facilitators, speakers and any other person acting on behalf of, or under the responsibility of, the Foundation when interacting with children.

The Foundation's activities focus on historical memory, remembrance, education, cultural initiatives, public events, research and engagement with schools, universities, institutions and civil society. Activities may include workshops, educational laboratories, commemorations, guided visits, conferences, interviews, group discussions, collection or use of testimonies and historical materials, photographs, videos and online communication.

The best interests, safety, dignity, participation and non-discrimination of the child must guide all decisions concerning children. No activity objective, communication need or project requirement takes precedence over child safety.

2. Definitions and risk assessment

Child safeguarding means the responsibility of the Foundation to ensure that its staff, operations and activities do not expose children to harm and that concerns about a child's safety are identified, reported and addressed appropriately.

Child abuse or harm includes physical abuse, psychological or emotional abuse, sexual abuse or exploitation, neglect, bullying, harassment, discriminatory conduct, inappropriate contact, online abuse, misuse of images or personal data, and any conduct that may threaten a child's physical or psychological integrity.

In the context of the Foundation's activities, particular risks may include:

- one-to-one or insufficiently supervised contact between an adult and a child;
- inappropriate physical, verbal, digital or social-media contact;

- photographing, filming, recording or publishing information about children without the required authorisation;
- collection or disclosure of personal data, testimonies or sensitive information;
- exposure to emotionally difficult historical content, including Holocaust, persecution, war, violence and massacres;
- discrimination, bullying, humiliating language or exclusion within group activities;
- travel, visits, public events or activities outside the usual school environment;
- a child disclosing violence, abuse, neglect or another safeguarding concern during an activity.

Before an activity involving children, the Foundation must consider the specific safeguarding risks and adopt proportionate preventive measures, taking into account the children's age, the venue, the activity format, supervision arrangements, data processing and the nature of the content.

3. Code of conduct: required and prohibited behaviour

All persons covered by this Policy must:

- treat children fairly, respectfully and without discrimination;
- use language and behaviour appropriate to the child's age and the educational context;
- maintain professional boundaries and avoid situations that may place a child or an adult at risk;
- ensure, as far as reasonably possible, that interactions with children take place in observable or supervised settings;
- follow the instructions of teachers, accompanying adults and the Foundation's Child Protection Officer;
- immediately report any safeguarding concern, allegation, disclosure or suspected breach of this Policy.

The following behaviour is prohibited:

- any physical, sexual, emotional or psychological abuse, exploitation, harassment or discriminatory conduct;
- sexualised language, jokes, comments, gestures or conduct in the presence of, or directed at, a child;
- unnecessary or inappropriate physical contact;
- being alone with a child in an isolated setting when this can reasonably be avoided;
- initiating private relationships or private communications with children through personal telephone numbers, messaging applications or social-media accounts outside the authorised activity context;
- giving preferential treatment, money, personal gifts or favours that could create dependency or be misunderstood;
- taking, storing, sharing or publishing photographs, videos, recordings or identifying information contrary to the applicable consent and data-protection rules;
- asking a child to keep a safeguarding-related secret;
- ignoring, minimising, investigating independently or concealing a safeguarding concern.

4. Safe recruitment and engagement of personnel

When the Foundation recruits or engages personnel, collaborators, volunteers or trainees for roles involving direct or regular contact with children, safeguarding suitability must form part of the selection and engagement process.

For such roles, the Foundation must, where applicable under Italian law and proportionate to the role:

- verify identity, qualifications and relevant professional experience;
- seek references or other appropriate information concerning suitability to work with children;
- obtain the criminal-record or other legally required background checks applicable to activities involving direct and regular contact with minors;
- inform the person of this Policy and obtain a commitment to comply with it before contact with children begins.

External organisations participating in activities with children remain responsible for the suitability and conduct of their own personnel. The Foundation must communicate the safeguarding standards applicable to the activity.

5. Data protection, images and communications

Personal data relating to children must be processed in accordance with Regulation (EU) 2016/679 (GDPR), applicable Italian legislation and the Foundation's data-protection procedures.

The Foundation must collect only data necessary for the activity, restrict access to authorised persons, store information securely and retain it only for the period required by the applicable purpose and legal obligations.

Where consent or another specific authorisation is required, participation in an activity and the taking/use of photographs, videos or recordings must be covered by the appropriate information and authorisation from the parent or legal guardian. Consent for participation and consent for images/recordings must be treated as distinct matters where appropriate.

Images and communications must preserve children's dignity. Children must not be depicted in degrading, stigmatising, sexualised, unsafe or otherwise inappropriate situations. Identifying details must not be published where doing so could expose a child to risk.

6. Training and awareness

The Foundation must ensure that persons who have responsibilities involving children receive information appropriate to their role on this Policy, expected conduct, recognition of safeguarding concerns and reporting procedures before or at the start of the relevant activity.

The Child Protection Officer must ensure that the Policy is made known to staff and relevant collaborators and that additional briefings or training are organised when the nature or frequency of activities involving children requires them.

7. Child Protection Officer

The Foundation must designate a Child Protection Officer (CPO) who acts as the internal safeguarding contact and reporting authority.

The CPO must:

- receive safeguarding concerns, complaints and reports;
- support risk assessment and preventive measures for activities involving children;
- ensure that reports are recorded confidentially and access is restricted;
- determine, with the Legal Representative where appropriate, whether referral to competent external authorities or services is required;
- coordinate awareness and training on this Policy;
- monitor implementation and propose updates to the Policy.

Designated Child Protection Officer: Paola Sabbatani

Contact details: info@alfredlewin.org

8. Reporting procedure

Any person who witnesses, suspects, receives a disclosure of, or becomes aware of possible harm to a child must act promptly. The person's role is to report the concern, not to investigate it.

The following procedure must be followed:

1. If there is an immediate danger to a child, take reasonable steps to secure the child's immediate safety and contact the competent emergency or law-enforcement services without delay.

2. Listen calmly to the child if a disclosure is made. Do not interrogate, pressure, promise secrecy or suggest answers. Explain that the information must be shared with the people responsible for keeping the child safe.
3. Record the relevant facts as soon as possible, using the reporting form in Annex 1. Distinguish clearly between what was observed, what was said and any personal interpretation.
4. Report the concern immediately to the Child Protection Officer. If the concern involves the CPO, report it directly to the Legal Representative.
5. The CPO must assess the safeguarding response and, where required, refer the matter without undue delay to the competent external child-protection, social, health, emergency or judicial authorities.
6. Information must be shared strictly on a need-to-know basis. The identity and privacy of the child and of all persons involved must be protected.

No person may retaliate against a child or adult who raises a safeguarding concern in good faith.

9. External referral and emergency contacts

The Foundation does not replace public child-protection, social, health or judicial authorities. Where a concern requires external intervention, the CPO or Legal Representative must contact the competent authority according to the nature and urgency of the case.

For immediate emergencies in Italy, the European emergency number 112 must be used. For child-specific support or reporting, the Foundation must refer to the competent territorial services and, where appropriate, national services dedicated to children. Contact details relevant to the venue and activity must be verified before events involving children.

The CPO must maintain an up-to-date internal list of competent local safeguarding and referral contacts.

10. Complaints mechanism

Children, parents or legal guardians, accompanying adults, staff and other persons must be able to raise a safeguarding complaint or concern directly with the Child Protection Officer or the Legal Representative.

Complaints may be made verbally or in writing. They must be taken seriously, acknowledged promptly, handled confidentially and assessed without discrimination or retaliation. A complaint concerning the CPO must be addressed directly to the Legal Representative.

The Foundation must provide clear contact details for safeguarding complaints in connection with activities involving children and must explain, in an age-appropriate way where necessary, how a child can ask for help.

11. Breaches of the Policy

A breach of this Policy may result in immediate removal from an activity involving children and, depending on the person's relationship with the Foundation and the seriousness of the conduct, suspension or termination of the assignment or collaboration, as well as referral to competent authorities.

Safeguarding action must not be delayed solely because an internal disciplinary or contractual process is pending.

12. Implementation, publication and review

This Policy enters into force on the date of signature by the Legal Representative. It must be freely and publicly available online on the Foundation's website or another official public web page controlled by the Foundation.

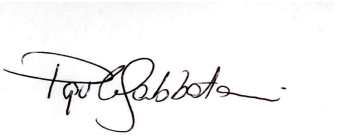
The Policy must be reviewed at least every two years and earlier whenever there is a significant change in legislation, organisational activities, identified risks, safeguarding guidance, or following a safeguarding incident that demonstrates the need for revision.

The Child Protection Officer coordinates the review. Any revised version must be approved by the Legal Representative.

The Foundation will seek, where appropriate and practicable, feedback from children, young people, educators and other relevant stakeholders to improve the accessibility and effectiveness of its safeguarding arrangements.

13. Approval and commitment

Fondazione Alfred Lewin ETS adopts this Child Protection Policy as an organisational safeguarding framework. All persons acting on behalf of the Foundation in activities involving children must comply with it.

Place and date	Forlì, 15/09/2026
Legal Representative	Bettina Foa – President
Signature	
Child Protection Officer	Paola Sabbatani
Signature	

ANNEX 1 – CHILD SAFEGUARDING CONCERN / INCIDENT REPORT FORM

This form must be completed as soon as possible after a safeguarding concern, disclosure, allegation or incident. Record facts accurately. Do not conduct an investigation or ask leading questions.

Date and time of report: _____

Name and role of person completing the form:

_____

Contact details: _____

Activity / event and location: _____

Child's name or identifier (only if necessary):

_____

Child's age (if known): _____

Parent / legal guardian / accompanying adult (if relevant):

_____

Date, time and place of incident or disclosure:

_____

Factual description of what was observed or reported (use the child's own words where relevant)

_____

_____

_____

_____

Immediate action taken

_____

_____

_____

_____

Persons informed and time of notification

_____

_____

_____

_____

External authority/service contacted, if any

_____

_____

_____

_____

Further action / follow-up decided by the Child Protection Officer

_____

_____

_____

_____

Signature of reporting person: _____ Date: _____

Received by Child Protection Officer: _____ Date/time: _____

ANNEX 2 – QUICK SAFEGUARDING RULES FOR ACTIVITIES WITH CHILDREN

- Treat every child with dignity, respect and fairness.
- Maintain professional boundaries and avoid isolated one-to-one situations.
- Do not use private messaging or personal social-media channels to establish contact with children outside authorised activity arrangements.
- Do not take or publish images or recordings unless the required authorisation is in place.
- Never promise secrecy if a child discloses a safeguarding concern.
- Do not investigate suspected abuse yourself.
- Report any concern immediately to the Child Protection Officer.
- If a child is in immediate danger, prioritise safety and contact the competent emergency services.