



ORGANISATIONAL POLICY

Safeguarding and participant protection policy

Protection of children and adults at risk in local and international activities

Version	2.0
Revision	28 August 2026
Effective date	1 October 2026
Next ordinary review	1 October 2028

OUR COMMITMENT

Io Per l'Altro - APS considers the safety, dignity and autonomy of every person an essential condition of any educational experience. This policy sets out the minimum principles, responsibilities and procedures used to prevent and respond to abuse, neglect, harassment, exploitation, discrimination and other forms of harm in the Association's activities.

GUIDING PRINCIPLE

Protection does not mean removing every risk or taking decisions away from people. It means designing activities carefully, listening without minimising concerns, responding proportionately and never leaving a person alone when they ask for help.

1. Purpose and scope

This policy applies in Italy and abroad during local activities, mobility projects, youth exchanges, training courses, residential events, outdoor activities, travel, online meetings and any initiative organised, funded or represented by Io Per l'Altro - APS.

It applies to:

- members of the Board of Directors and members involved in activities
- employees, contractors, professionals, volunteers, trainers and facilitators
- group leaders, accompanying persons and host families
- partner organisations and suppliers when working within an Association project
- participants, with rules adapted to their age, role and capacity to understand

Where the law of the host country or the rules of the funding programme set a higher standard, the more protective lawful standard applies.

2. People protected

The policy protects all participants. It gives particular attention to children and to adults who, in a specific context, may face greater barriers in recognising risk, asking for help or exercising their rights.

Term	Definition
Child	any person under the age of 18.
Adult at risk	an adult whose exposure to risk may increase, including temporarily, because of disability, psychological distress, social isolation, dependence on others, language barriers, economic circumstances, international travel or an imbalance of power.
Safeguarding	the measures through which the Association prevents harm, creates safer environments, receives concerns and responds responsibly.
Harm	physical, psychological or sexual abuse; neglect; exploitation; harassment; bullying and cyberbullying; discrimination; retaliation; or a serious breach of professional boundaries or personal dignity.

The Association's activities are normally open to people aged 14 and over. Each project may set a higher threshold. Where children participate, permissions, supervision and specific safeguards must be defined before the activity.

NON-STIGMATISING APPROACH

A personal condition does not automatically make someone vulnerable. Vulnerability arises from the interaction between the person, the environment, the activity and power relationships.

3. Principles

- the person at the centre and the best interests of the child
- dignity, listening, participation and informed consent
- practical prevention and risk reduction
- non-discrimination and equal access to protection
- confidentiality on a strict need-to-know basis
- timely, proportionate and documented response
- no retaliation against anyone who raises a concern in good faith
- cooperation with competent authorities and services where required by law or necessary for protection

4. Roles and responsibilities

Role	Core responsibility
Board of Directors	Approves the policy, oversees implementation and considers revisions.
President - Marco Valerio Battaglia	Holds organisational accountability and coordinates contact with insurers, authorities, families and the National Agency, unless immediate action is required in the field.
Safeguarding Lead - Francesca Salmeri	Receives and assesses concerns, defines initial protective measures, safeguards confidential records and coordinates the internal response.
Deputy Safeguarding Lead - Giulia Bardelli	Acts in the Lead's absence, supports needs assessment and receives concerns involving the Safeguarding Lead.
Independent review contact - Endrit Dodaj	Handles review requests and concerns involving the President, the Safeguarding Lead or a potential conflict of interest.
Project lead	Integrates safeguarding into the project, briefs the team and participants, and verifies contacts, consent and project-specific measures.
Trainers, facilitators and group leaders	Maintain a safer environment, remain observant, act on immediate risks and report concerns without conducting their own investigation.
Partners	Apply at least equivalent standards, appoint a local focal point and share only information necessary for safety.

5. Prevention: people, projects and partners

Prevention begins before the activity. The level of screening and preparation is proportionate to the role, frequency of contact, participant age and project characteristics.

- CV and values-based interview for trainers and contractors, including explicit review of experience with young people and groups at risk
- references or additional checks for high-responsibility roles or roles involving direct and regular contact with children
- the criminal record certificate under Article 25-bis of Presidential Decree 313/2002 whenever required by applicable law
- written appointment and a mandatory policy briefing before the activity
- risk assessment for residential, outdoor and international activities or where participants have specific needs
- checks on partners, the local focal point, host-country requirements and emergency routes

The President makes the final appointment decision. Where a project involves children or presents higher risks, the decision is shared with the Safeguarding Lead and documented.

6. Standards of behaviour

Anyone working for the Association must:

- treat every person with respect and avoid offensive, discriminatory, sexualised or humiliating language
- maintain clear professional boundaries and use authority only for educational and protective purposes
- obtain understandable and freely given consent for activities involving physical contact, emotional exposure or image use
- stop or adapt an activity when signs of distress or risk emerge
- report concerns, incidents and policy breaches promptly

The following is prohibited:

- initiating or maintaining romantic or sexual relationships with children
- initiating an intimate relationship during a project between a person in a position of authority, care or assessment and an adult participant
- exchanging money, loans or unauthorised personal gifts with participants
- punishing, threatening, blackmailing, deliberately isolating or ridiculing a person
- ignoring or concealing a concern to protect the reputation of a person, project or the Association
- using or distributing illegal substances; alcohol and smoking are permitted only where lawful, within project rules and without compromising responsibility or supervision

7. Specific rules for children

CORE RULE

Contact with a child must be necessary, professional, transparent and, as far as possible, observable by another adult.

- no private meeting in a closed or isolated space; where a one-to-one conversation is necessary, it takes place in a visible setting, another adult is informed and the exception is recorded
- no personal-account messaging or secret conversation; official or group channels are used and, as appropriate, a parent, guardian or group leader is included
- no private request, receipt or exchange of images; official photography only with the required authorisation and respect for the child's dignity
- entry to bedrooms only where genuinely necessary, after announcing entry and, where possible, with another adult present or the door open
- one-to-one car transport only where necessary, authorised and communicated; a second adult or participant should be present where possible
- physical contact only where appropriate to the activity, explained in advance, non-sexualised and stopped immediately upon request or any sign of discomfort
- for residential activities, supervision, room allocation, schedules, emergency contacts, permissions and medication arrangements are defined in advance

8. Adults at risk

Support is agreed with the person concerned and designed to preserve autonomy. Information about health, disability or distress is shared only with those who need it to provide support or prevent a concrete risk.

- a pre-activity conversation about needs and practical adjustments
- the option to identify a trusted person and, where needed, an emergency contact
- no automatic exclusion based on a diagnosis or personal condition

- a proportionate support plan for mobility, outdoor activities or situations of increased exposure
- the option to withdraw from a specific activity without humiliation or improper penalty

9. Travel, overnight stays and outdoor activities

- the project lead allocates rooms with the team, considering age, gender, needs, reasonable preferences and safety
- insurance, accessibility, transport, local contacts, first aid and emergency procedures are checked before the activity
- the Association and volunteer insurance linked to ACSE affiliation is checked against the characteristics of each project; additional participant cover is arranged where needed
- trainers and facilitators may modify or stop an activity immediately; the President is informed as soon as circumstances allow
- information on allergies, intolerances, medication and support needs is collected confidentially and made available only to designated persons
- each international mobility has a country sheet containing emergency numbers, competent services, the local partner, consular contacts and insurance details

10. Images, data and digital safety

- participation is not conditional on consent to image publication
- notices and consent are collected before public image use through a simple and verifiable digital process
- images and testimonials must not expose a person to stigma, unwanted location disclosure, ridicule or risk
- identity, health and contact data are accessible only to the President and project lead, or to additional persons on a strict need-to-know basis
- partners receive only necessary data, normally name, surname, date of birth and essential allergy or intolerance information
- AI tools must not receive sensitive data or identifiable participant content without a specific assessment and lawful basis

Ordinary project data is deleted when no longer needed, subject to funder record-keeping obligations. Incident and safeguarding records follow separate retention periods based on the protection of people, legal obligations and the need to document decisions.

11. How to raise a concern

IMMEDIATE DANGER

Move the person to safety and contact the emergency services in the country where the incident occurs. Then inform the field lead and the President as soon as possible.

A concern may be raised verbally with the Safeguarding Lead, Deputy Lead or project lead, or by email to ipaostia@gmail.com using the subject CONFIDENTIAL - SAFEGUARDING. Direct contact details are included in each project's participant information pack.

Situation	Route
Ordinary concern	Francesca Salmeri - Safeguarding Lead
Concern involving Francesca Salmeri	Giulia Bardelli - Deputy Safeguarding Lead
Concern involving the President or a conflict of interest	Endrit Dodaj - Quality & Monitoring Manager and Board member

Situation	Route
Immediate danger	Emergency services and field lead; the President is informed afterwards

The Association encourages identifiable reports so that it can protect people, seek clarification and provide updates. Anonymous information is not ignored, although it may limit the ability to verify facts and respond.

12. Responding to a concern

1. Listen calmly without interrogating, promising absolute secrecy or questioning the person's account.
2. Check immediate safety and any urgent medical, psychological or practical support needs.
3. Record key words, observed facts, date, place and people present as soon as possible, separating fact from interpretation.
4. Pass the concern to the appropriate focal point without conducting a personal investigation or directly confronting those involved.
5. Acknowledge receipt within 48 hours and complete an initial risk assessment, immediately in urgent cases.
6. Decide protective measures and next steps: support, internal clarification, referral to services or authorities, suspension or a reasoned closure.
7. Where possible and lawful, keep the reporting person informed about the process and timing without disclosing confidential information about others.

LIMITS OF FACILITATION

Facilitated or restorative dialogue is used only where safe, voluntary and appropriate. It does not replace protection, fact-finding or referral to authorities and is not imposed in cases of abuse, sexual violence, coercion or a severe power imbalance.

13. Measures and consequences

Measures depend on seriousness, urgency, risk of recurrence, the role of the person involved and the needs of the person being protected. They may include:

- activity changes or increased supervision
- a warning and corrective directions
- contact restrictions or reassignment
- temporary or permanent removal from the activity
- suspension or termination of the working relationship
- suspension or termination of the partnership
- referral to services, funders, insurers or competent authorities

Protective measures are not automatically a final finding: their purpose is to reduce risk while the concern is assessed.

14. Review, confidentiality and protection from retaliation

A person directly affected by an internal decision may request a reasoned review within 10 working days. The review is handled by Endrit Dodaj or, where a conflict exists, by an uninvolved Board member or external professional. A review does not automatically suspend protective measures.

Information is shared only with those who need it to protect, decide or meet an obligation. Retaliation, pressure or disadvantage against anyone reporting or cooperating in good faith is prohibited. Confidentiality cannot be promised where action is necessary to protect a person or comply with the law.

15. Information, training and monitoring

- the policy is published on the website and referenced in project materials
- staff, volunteers, contractors and partners receive a role-appropriate briefing; completion is documented in the project file even where no individual signature is required
- participants receive an accessible summary with focal points and reporting routes
- the policy is reviewed every two years and after significant incidents, legal changes or issues identified through monitoring
- the Safeguarding Lead provides the Board with a periodic anonymised update on training, concerns, response times and improvements

16. Contact

Organisation	Io Per l'Altro - APS
Registered office	Via Agostino Scaparro 7, 00122 Rome, Italy
Email	ipaostia@gmail.com
Certified email	ioperlaltro@pec.it
Website	www.ioperlaltro.com
Safeguarding Lead	Francesca Salmeri
Deputy Safeguarding Lead	Giulia Bardelli
Independent review	Endrit Dodaj

17. References

- United Nations Convention on the Rights of the Child, 1989.
- Commission Recommendation (EU) 2024/1238 on integrated child protection systems.
- Erasmus+ Programme Guide 2026 and Erasmus+ quality standards on safety, protection and non-discrimination.
- Italian Presidential Decree 313/2002, Article 25-bis, and Legislative Decree 39/2014 concerning criminal record checks for roles involving direct and regular contact with children.
- Regulation (EU) 2016/679 and Italian Legislative Decree 196/2003, as amended, on personal data protection.

<https://eur-lex.europa.eu/eli/reco/2024/1238/oj/eng>

<https://erasmus-plus.ec.europa.eu/programme-guide/part-a/important-features>

https://www.giustizia.it/giustizia/page/it/come_fare_per_certificati_casellario_datore_lavoro

<https://www.garanteprivacy.it/home/faq/scuola-e-privacy>

Approval

Approved by	Board of Directors of Io Per l'Altro - APS
Resolution date	
Effective date	1 October 2026
Legal representative's signature	IO PER L'ALTRO APS Via A. Scaparro 7, 00122 Roma io.per.l.altro.aps@ioperlaltro.com Marco Valerio Battaglia 