CHILD PROTECTION POLICY · INTERNAL POLICY DOCUMENT

Policy for the safeguarding and protection of minors

FVG Pride ODV - Friuli-Venezia Giulia Pride ODV · Version 1.0

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1 · Statement of commitment

FVG Pride ODV recognises that every person under 18 who comes into contact with the association - by attending an event, seeking support at a "Punto Viola", writing on the association's channels or taking part in a training activity - has the right to be protected from all forms of violence, abuse, exploitation, harassment, discrimination and neglect.

The association adopts a zero-tolerance commitment: no form of abuse or mistreatment is tolerated, minimised or dealt with informally, regardless of the role, seniority or standing of the person involved. The protection of the minor takes precedence over any reputational, organisational or political interest of the association.

The association also recognises that LGBTQIAPK+ minors face specific risks: they may live in non-affirming or hostile family environments, be exposed to domestic violence, bullying and harassment precisely because of their identity, and have a very limited adult support network. For many of them an association event is the first space in which they can express themselves. This calls for a higher, not lower, standard of care.

This policy is a living document: it applies as approved and is reviewed in light of operational experience and legislative developments.

2 · Purpose, scope and target audience

2.1 Purpose

- Define expected and prohibited behaviour for anyone acting on behalf of the association.
- Prevent abuse, harassment and risk situations in association activities.
- Ensure that every concern or report is identified, handled and, where required, referred to the competent authorities promptly and traceably.
- Protect minors, those who report in good faith, and those working in support services.

2.2 Scope

The policy applies to all the association's activities: the regional demonstration and related events, the Punto Viola support points, training and awareness activities including in schools, digital spaces and communication channels, and activities carried out within partnership projects.

2.3 Who the policy applies to

The following are bound by the policy and must sign the code of conduct in section 7:

- Members of the Board of Directors and office holders.
- Volunteers in any capacity and for any duration, including those active for a single event.
- Employees, contractors, professional consultants and interns.
- Trainers, speakers, performers, stewarding staff, suppliers and their personnel, when working in settings where minors are present.
- Project partners, within the limits and forms set by partnership agreements.

2.4 Document control

Item	Details
Document title	Policy for the safeguarding and protection of minors
Owning organisation	Friuli-Venezia Giulia Pride ODV (FVG Pride ODV)
Version	1.0

Item	Details
Date of approval	15/09/2026
Approving body	Board of Directors
Child Safeguarding Lead	Alice Chiaruttini – fvgpride@gmail.com - 3703056131
Deputy Safeguarding Lead	Alice Chiaruttini – fvgpride@gmail.com - 3703056131
Scope	All activities, events and channels of the association
Next scheduled review	15/09/2027 - in any case within 24 months

3 · Guiding principles

1. Best interests of the child. Every decision is guided by what best protects the person involved, not by what is most convenient for the organisation.

2. Listening and participation. Minors have the right to be heard, to be told in an understandable way what will happen, and to be involved in decisions affecting them, in line with their age and maturity.

3. Non-discrimination. Protection is guaranteed regardless of sexual orientation, gender identity and expression, sex characteristics, origin, citizenship, legal status, disability, neurodivergence, language, religion or socio-economic status.

4. Prevention first. Protection is built through selection, training, procedures and well-designed environments, not by reacting after the event.

5. Shared and individual responsibility. Protection is the task of everyone working in the association; nobody can fully delegate their responsibility to report.

6. Confidentiality and data minimisation. Information is shared only with those who need to know it to protect the person.

7. Do no harm. Measures taken must not cause further harm: involuntary exposure, outing, secondary victimisation, disruption of a support network.

8. Transparency and traceability. Every report and decision are recorded, dated and verifiable.

4 · Legal framework

The policy is adopted in line with the international, European and national framework on the rights and protection of minors, in particular:

- UN Convention on the Rights of the Child (1989), especially the articles on best interests, the right to be heard and protection from all forms of violence.
- Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse (Lanzarote Convention, 2007), ratified by Italy through Law 172/2012.
- Council of Europe Convention on preventing and combating violence against women and domestic violence (Istanbul Convention, 2011).
- Charter of Fundamental Rights of the European Union and the EU Strategy on the Rights of the Child.
- Regulation (EU) 2016/679 (GDPR) and Italian Legislative Decree 196/2003 as amended, on personal data protection and special categories of data.
- Italian Criminal Code and Code of Criminal Procedure, regarding offences against the person and obligations to report to the authorities.
- Italian Civil Code and legislation on parental responsibility, regarding urgent measures to protect minors.
- Italian Legislative Decree 39/2014, on criminal record certificates for those carrying out professional activities involving direct and regular contact with minors.
- Italian Legislative Decree 117/2017 (Third Sector Code) and applicable regional legislation of Friuli Venezia Giulia.
- The association's statute and internal regulations, which this policy supplements.

This list should be confirmed and supplemented with legal advice, particularly regarding the exact scope of reporting obligations and criminal record checks, which depend on the nature of the relationship and the activity.

5 · Operational definitions

Minor

Anyone under eighteen, regardless of citizenship, legal status, or the presence or absence of those with parental responsibility.

Abuse and mistreatment

- Sexual abuse - any involvement in sexual activity, with or without contact, including exposure to sexual material, requesting or sending intimate images, and grooming.
- Physical abuse - any act that causes or may cause physical harm, including corporal punishment and unnecessary restraint.
- Psychological and emotional abuse - humiliation, denigration, isolation, threats, emotional blackmail, systematic rejection of the person's identity.
- Neglect - failure to provide due care, protection or supervision.
- Exploitation - use of the person for economic, sexual, propaganda or image purposes, including instrumental use in communications.

Conduct specifically relevant to the association's context

- Grooming - gradually building a relationship of trust with the aim of abuse, typically through private contact, gifts, exclusive attention and shared secrecy.
- Abuse of a position of trust or authority - using the role of reference person, trainer, coordinator or support worker to gain advantage or access to the person.
- Non-consensual outing - disclosing to third parties, including family, a person's sexual orientation, gender identity, transition or health status; this is considered a serious harm and may endanger the person's safety.
- Online violence - harassment, doxing, non-consensual sharing of images, threats via digital channels.
- Peer-on-peer abuse - bullying, harassment and assault between minors, which also requires intervention and cannot be dismissed as group dynamics.

Minority stress

Chronic stress resulting from continuous exposure to stigma, discrimination, expectation of rejection and concealment of self. Relevant to this policy because it increases vulnerability, reduces help-seeking, and can surface as acute crisis at events.

Concern / report

Any communication, including a mere doubt or worry, about a risk or possible harm to a minor. It requires no evidence, certainty or legal classification of the facts.

6 · Prevention: recruitment, screening and suitability

Selection is the first protective measure. The association's staff selection and team composition protocols apply in full, with the following enhanced requirements for anyone working in settings where minors are present.

6.1 Screening procedure

1. Written application with verifiable personal details, history of previous experience with minors, and any interruptions in that experience.

2. Identity verification by official document.

3. At least two references, one from an organised setting, with actual contact made with the referees.

4. Individual interview by at least two leads, one from safeguarding coordination, with situational scenarios dedicated to child protection.

5. Criminal record certificate where and as required by current legislation; where not legally required, a self-declaration of no convictions or proceedings for offences against the person, with an obligation to report any subsequent change immediately.

6. Signature of this policy and the code of conduct, with a declaration of having understood their content.

7. Mandatory training completed before the first operational shift, with a learning assessment.

8. Probationary shadowing with an experienced person, followed by a joint suitability assessment.

6.2 Grounds for exclusion and withdrawal of suitability

- Convictions, pending proceedings or established conduct for offences against the person, in particular of a sexual nature, or for mistreatment, stalking and domestic violence.
- Refusal to sign the code of conduct, attend training or provide verifiable references.
- Previous dismissal from another organisation for child protection reasons, where established.
- Breach of the code of conduct, with measures proportionate to the seriousness and immediate withdrawal where safety is affected.
- False or incomplete statements during selection.

6.3 Rotation, supervision and ongoing checks

Suitability is not permanent: it refers to a specific role and activity cycle and is reconfirmed for each edition. Nobody works without an identified line manager. Positions involving ongoing contact with minors are subject to periodic supervision and are never held by a single person over time.

7 · Code of conduct

The code applies to anyone acting on behalf of the association, in person and online, during and outside activity hours where the relationship with the minor originates in the association's context.

Required	Prohibited
Remain in visible spaces and, where possible, with at least two responsible adults present.	Being alone with a minor in closed, secluded or non-visible places.
Ask for consent before any physical contact, even simple comfort, and keep it to what is necessary.	Any sexual, intimate, prolonged or unwanted physical contact; rough play, tickling, contact the person has not accepted.
Use official association channels for all communication, with a responsible adult always copied in or in the group.	Private chat or social media contact with a minor, requesting or sending images, exchanging personal contacts, meetings outside activities.
Address the person by the name and pronouns they indicate, in every association context.	Outing anyone, even indirectly, regarding sexual orientation, gender identity, transition or health status.
Recognise one's own limits and involve the Safeguarding Lead when a risk situation emerges.	Acting as sole confidant, promising absolute secrecy, handling an abuse or risk situation alone.
Abstain from alcohol and drugs during any activity involving minors.	Consuming or offering alcohol, tobacco or drugs to minors, or working while impaired.
Transport a minor only at the written request of those with parental responsibility, and never alone.	Offering lifts, accommodation or money personally; giving individual gifts.
Immediately report any conduct, one's own or others', that could be perceived as inappropriate.	Covering up, minimising or informally resolving a report received.

7.1 Two-adult rule and visibility

Activities involving minors are designed so that no conversation takes place in isolation: they are held in spaces open to view, with at least two responsible adults present in the area. Where a confidential conversation is necessary - typically at a "Punto Viola" - the person conducting it remains visible at a distance to a second adult, informs a lead when it begins and reports on its outcome.

7.2 Digital communication

- All contact takes place via official association accounts and channels, never personal profiles.
- Conversations with minors are logged and accessible to the Safeguarding Lead.

- Private images are never requested or accepted; conversations are never moved to private or ephemeral channels.
- Requests for support received online are treated as concerns and passed on to the Safeguarding Lead.

7.3 Images, filming and communication

- No recognisable image of a minor is published without the informed consent of those with parental responsibility and the assent of the minor.
- Consent is specific, revocable and limited to stated purposes and channels; it is never presumed from attendance at the event.
- Particular care is taken where publication could reveal sexual orientation or gender identity: when in doubt, do not publish.
- Images are stored in protected association archives for as long as necessary, not on the personal devices of those who took them.

7.4 Minors in non-affirming family situations

This is the most sensitive situation the association encounters. Staff do not promise absolute secrecy and do not take the place of the family network or services. At the same time, they take no action that exposes the person: no communication to the family about sexual orientation or gender identity, and no contact with third parties about the person's situation, except where required by law or necessary to protect them from current danger.

Where danger within the family emerges, the Safeguarding Lead considers involving social services and the competent authority, telling the minor what will happen and why, in age-appropriate language, and accompanying them through the process.

Handling cases involving parental responsibility and the limits of confidentiality should be defined in detail with legal advice and, where possible, through a protocol with local social services and family counselling centres.

8 · Minors at events and at the "Punto Viola"

8.1 Event planning

- Risk assessment before each event, stating the expected presence of minors, critical areas and services activated.
- Clearly signposted "Punto Viola" and meeting point for lost persons.
- Staff identifiable by uniform markings, so minors know whom to approach.

- Separate, controlled areas where alcohol is served, with the ban on serving minors enforced and checked.
- Accessible advance information on how and whom to ask for help, also shared on the event's digital channels.

8.2 Receiving a minor at the “Punto Viola”

- Immediate listening in a protected yet visible space, without requiring documents or explanations as a condition of access.
- No investigation of the facts: only what the person spontaneously shares is recorded, in their own words.
- Prompt involvement of the Safeguarding Lead, who takes responsibility for the case.
- In case of physical illness, suspected substance use, injury or acute crisis, medical services and 112 are called without waiting for any authorisation.
- For an unaccompanied minor in danger, law enforcement and competent services are called.
- The person is told what will be done and why, before it is done, whenever possible.

8.3 Lost or unaccompanied children

A dedicated procedure with a single meeting point, recording of time and description, staff assigned in pairs to supervise, a search coordinated by event management, and police involvement within a maximum time set out in the event safety plan.

9 · Reporting and responding to concerns

9.1 Duty to report

Anyone working for the association must immediately report to the Safeguarding Lead any fact, suspicion or concern about a minor’s safety, including the conduct of other people in the association. Certainty is not required: assessment is not the reporter's responsibility. Silence or delay is a breach of this policy.

9.2 Reporting channels

- Directly to the Safeguarding Lead: Alice Chiaruttini – fvgpride@gmail.com – 3703056131.
- To the Deputy Safeguarding Lead, where the concern relates to the Lead or there is a conflict of interest.
- To the legal representative or the Board of Directors, where the concern relates to both Leads.
- In case of imminent danger: 112, without any prior internal step.

9.3 Do's and don'ts

1. Make the person safe and stay with them if they wish.

2. Listen without interrupting, suggesting, asking for details or seeking confirmation.

3. Do not promise secrecy: explain honestly that some information will need to be shared with those who can protect them.

4. Do not question or alert the alleged perpetrator, gather evidence or compare accounts.

5. As soon as possible, record facts, date, time, place, people present and words used, in the person's own words, distinguishing what was observed from what was inferred.

6. Pass the record to the Safeguarding Lead and share it with no one else, on any informal channel.

9.4 Response flow

Stage	Timing	Who acts	Action
Receipt	Immediate	Person receiving the concern	Makes the person safe, does not investigate, records facts in the words used, informs the Safeguarding Lead.
Imminent risk	Immediate	Person identifying the risk	Calls 112 and, if needed, medical services. Safety comes before any internal procedure.
Assessment	Within 24 hours	Safeguarding Lead	Assesses the risk level, decides interim internal measures, checks whether reporting obligations to the authorities apply.
External referral	Without delay	Safeguarding Lead with the legal representative	Referral to the Public Prosecutor at the Juvenile Court, law enforcement or competent social services, as appropriate.
Internal measures	Within 48 hours	Board of Directors	Precautionary, non-disciplinary suspension of the person concerned from their role for the duration of the enquiry.
Support	In parallel	Safeguarding Lead and Punto Viola coordination	Support for the minor and for the person who reported; referral to services; no pressure towards unwanted choices.
Closure and learning	Within 30 days	Board of Directors	Anonymised recording of the outcome, review of procedures, corrective training where needed.

9.5 Protection of those who report

Anyone reporting in good faith is protected from any retaliation, exclusion, demotion or pressure, even if the concern proves unfounded. Malicious or knowingly false reports are subject to disciplinary measures. On request, the reporter's identity is kept confidential within the limits allowed by law and the needs of the enquiry.

9.6 Register of concerns

The Safeguarding Lead keeps a register of concerns received, with date, nature of the matter, measures taken, outcome and closure date - pseudonymised for monitoring purposes, and in full with strictly limited access. The register feeds into the periodic review of the policy and reporting to the Board and, where required, to project partners in aggregated form.

10 · Data protection and confidentiality

1. Information about a minor is processed only for protection purposes and only by those who need to know it.

2. Data on sexual orientation, gender identity and health are particularly sensitive categories and receive the highest level of care.

3. Storage is on protected association systems, with limited and logged access, for the minimum time necessary and according to the retention periods in the record of processing activities.

4. Storing data, notes, images or conversations on personal devices and accounts is prohibited.

5. Privacy notices for minors and those with parental responsibility are written in plain language.

6. Any disclosure to third parties, other than legal obligations, requires a documented legal basis.

11 · Training

11.1 Mandatory basic training

A prerequisite for working in any activity where minors are present. Minimum content:

- This policy, the code of conduct, reporting channels and obligations.
- Recognising signs of abuse, mistreatment, neglect, grooming and peer-on-peer abuse.
- Minority stress, internalised stigma, suicide risk in adolescence and non-alarmist responses.
- Communicating with minors: listening, language, role limits, managing expectations.

- Confidentiality, outing and handling sensitive information.
- Digital safety and online conduct.
- Preventing secondary victimisation and person-centred support.

11.2 Specialist training

- For the Lead and Deputy: risk assessment, relations with the judiciary and social services, conducting protected interviews, managing the register.
- For "Punto Viola" coordination: managing acute crises involving minors, criteria for calling emergency services.
- For those working in schools and education: handling disclosures in a classroom setting and liaising with school staff.

11.3 Ongoing training

Mandatory annual refresher; dedicated briefing before each event; structured debriefing afterwards; external supervision for those who have handled high-impact cases; training review after each closed case.

12 · Responsibilities

Who	Responsibilities
Board of Directors	Approves the policy, appoints the Safeguarding Lead, ensures resources and training, decides precautionary and disciplinary measures, is accountable for overall implementation.
Child Safeguarding Lead	Single point of contact for concerns, assesses risk, manages relations with authorities and services, keeps the register, coordinates training.
Area and team leads	Apply the policy in activities, ensure staff are trained and suitable, report without filtering to the Safeguarding Lead.
Volunteers and collaborators	Sign and comply with the code of conduct, attend training, report any concern.
Third parties, suppliers and partners	Accept the policy as a contractual condition for working in settings involving minors.

13 · Monitoring, evaluation and review

- Annual review of policy implementation by the Board of Directors, with a report by the Safeguarding Lead.
- Indicators collected: percentage of staff trained and fully screened before their first shift; number of concerns received and average response and closure times; number of cases referred to the authorities; number of resulting procedural revisions; debriefing outcomes.
- Scheduled review at least every twenty-four months, and immediate extraordinary review after any serious case, relevant legislative change or significant change in activities.
- Where possible, consultation of young participants to check that the services are actually recognisable and accessible.

Version	Date	Changes	Approved by
1.0	15/09/2026	First adoption	Board of Directors

14 · Annexes

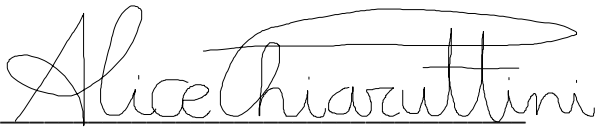
- Annex A - Form for signing the policy and code of conduct.
- Annex B - Application form and suitability assessment grid.
- Annex C - Concern reporting form and incident record sheet.
- Annex D - Image and filming consent form for those with parental responsibility.
- Annex E - Useful contacts: law enforcement, local social services, family counselling centres, anti-violence centres, child and adolescent helplines.
- Annex F - Register of concerns (restricted-access document).

The annexes are drafted and approved together with the policy and form an integral part of it.

15 · Approval

This policy was approved by the Board of Directors of FVG Pride ODV and comes into force on the date of approval. Knowledge and acceptance of it are a condition for acting on behalf of the association.

Place and date: Trieste, 13/10/2026

The President - Alice Chiaruttini: 

Child Safeguarding Lead: