



THE HUMAN SAFETY NET CHILD AND VULNERABLE ADULT PROTECTION POLICY



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The Human Safety Net Child and Vulnerable Adult Protection Policy

I. Introduction

A. Vision and safeguarding commitment

Fondazione Generali - The Human Safety Net - Ente Filantropico is a non-profit organisation, established by Assicurazioni Generali S.p.A., registered under Italian law and acting as the international operating vehicle for “The Human Safety Net”, Generali’s flagship initiative for the community.

The two programmes – For Families and For Refugees– target different societal challenges but share a common purpose: to unlock the potential of vulnerable people, so that they can transform their lives and that of their families and communities:

- the programme For Families supports parents living in vulnerable circumstances during the first six years of their children’s life.
- the programme For Refugees contributes to refugees’ inclusion through work and entrepreneurship into their host countries.

Fondazione THSN recognises that everyone has a right to protection and freedom from abuse and exploitation. Therefore, the rights, safety and protection of children and vulnerable adults is of paramount concern to Fondazione THSN.

The THSN Policy, as a part of Fondazione THSN responsibility for the safety and protection, is designed to ensure that children and vulnerable adults who are involved with or affected by THSN, directly or indirectly, are protected from any form of abuse and exploitation.

Fondazione THSN has a zero-tolerance policy for maltreatment in any form, as stated in the Generali Group Code of Conduct¹.

The first edition of this Policy has been adopted by Fondazione THSN on July 7, 2020, and shall be promptly reviewed, at least every three years, to include developments in legislation, best practices, strategy and organization.

B. Principles

THSN Policy is based on internationally recognized principles such as those set out in the United Nations Convention on the Rights of the Child and its optional protocols² and the most relevant international Conventions³ focusing on reducing all forms of violence against children through legal, public health, and community-based initiatives, with an emphasis on ending violence, torture, and exploitation in all

¹ Available at: <https://www.generali.com/our-responsibilities/responsible-business/code-of-conduct>

² In particular: The Optional Protocol on the Sale of Children, Child Prostitution and Child Pornography (OPSC); The Optional Protocol on the Involvement of Children in Armed Conflict (OPAC); The Optional Protocol on a Communications Procedure (OPIC).

³ Among the others: the United Nation Secretary-General’s Statement for the Elimination of Sexual Abuse and Exploitation and all child-related UN conventions; the Keeping Children Safe International Child Safeguarding Standards; the Child Safeguarding and Protection legislation and statutory guidance of Italy; The UN Principles of Older People (1999); The Convention for the Elimination of Discrimination Against Women (CEDAW); the International Covenant on Economic, Social and Cultural Rights; the International Convention on the Elimination of all Forms of Racial Discrimination; the Slavery Convention, as amended, and The Supplementary Convention on the abolition of Slavery; The Convention on the Status of Refugees and its additional protocol; the convention against Torture and other Cruel, Inhuman or Degrading Treatment or Punishment, the four Geneva Conventions of 1949, containing humanitarian rules for armed conflicts.

contexts where children live.

THSN Policy reflects the following basic principles enshrined in the abovementioned conventions³:

- all children and other vulnerable people have equal rights to protection from harm, regardless of gender, sexual orientation, ethnicity, disability or economic status;
- everybody has a responsibility to support the care and protection of children and vulnerable adults;
- organizations have a duty of care to children and vulnerable adults with whom they work, are in contact with, or who are affected by their work and operations;
- organizations should be held to account for their commitment to safeguarding, such that safeguarding concerns can be raised and discussed and poor practice and inappropriate behaviour challenged and addressed;
- if organizations work with partners, they have a responsibility to help partners meet the minimum requirements of safeguarding;
- all decisions and actions on safeguarding are taken in the best interests of the child and vulnerable adult, which are paramount;
- solutions to protecting children and vulnerable adults need to reflect the culture and operating environment and the nature of activities being undertaken. However, culture can never be used as an excuse for abuse.

C. Scope

THSN Policy applies to THSN Volunteers and THSN Partners, that must comply with its requirements and understand the actions that may be applied if any breach of THSN Policy is identified.

Failure to comply with THSN Policy may result in appropriate actions being taken. Breaches may result in the award of damages or criminal prosecutions according to local procedures and applicable legislation.

II. Prevention

A. Risk assessment and risk mitigation

A risk assessment⁴ of all THSN's operations, programmes and project activities that involve or impact upon children and vulnerable adults shall be conducted. Moreover, risk mitigation strategies shall be developed to minimize the risk of any form of abuse, maltreatment or exploitation of children and vulnerable adults, and incorporated into the design, delivery and evaluation of programmes, operations and activities, which involve or impact upon them.

B. Recruitment, Awareness Raising and Training

Focal points shall be designated both at a central and local level, as point of convergence for child and vulnerable adult protection and safeguarding standards and procedures.

All THSN Volunteers and THSN Partners shall receive an induction on child and vulnerable adult protection, on safeguarding and their responsibilities at the time of their engagement with THSN, including details on the procedure for reporting concerns.

⁴ A risk assessment is an exercise where an organization examines all aspects of its service from a safeguarding perspective, to establish whether there are any practices or features of the service that have the potential to put children and vulnerable adults at risk.

THSN Volunteers are informed of this Policy by accessing the dedicated platform, and are required to confirm annually, through the same platform, that they have read and fully understood its contents.

THSN Volunteers with particular responsibilities relating to safeguarding, such as the designated THSN Global/Local Focal Points, shall be provided with more in-depth training within 6 months of their appointment.

THSN Partners shall be encouraged to inform children and their families, and vulnerable adults about their safeguarding commitment and what to do if they have concerns about them.

C. Communications – use of images and information of children and vulnerable adults

The collection and use of personal data, including visual images (both photographic still and video), in the context of all THSN-related communications, shall be processed in compliance with EU Regulation 679/2016 (General Data Protection Regulation – GDPR) and any applicable personal data protection regulation.

Fondazione THSN ensures that:

- when taking photographs or video footage of individuals, all persons involved are informed in advance about the general purpose and intended use their personal data;
- a written information notice is provided to the data subjects involved before any shooting and the activity can take place only if the person has given her/his prior free, unconditioned and written consent. In case the shooting portraits minors, the information notice and the consent shall be given by the holders of the parental responsibility (normally both parents) or by the child's legal guardian;
- consent above mentioned can be revoked anytime, without affecting the lawfulness of processing based on consent before its withdrawal;
preferably shooting must portrait group of people, instead of individuals and shooting time and areas shall be prearranged;
- to protect confidentiality and minimize the risk of harm and stigma to individuals involved, especially when children or other vulnerable people re involved, additional safeguards shall be implemented. These may include for example concealing faces, using only pseudonyms instead of real name and surname and indicating vague, imprecise or fake locations;
- images and any other related personal data collected shall be stored securely and applying adequate technical and organization safeguards, so to ensure personal data safety and confidentiality;
- file labels, metadata and text descriptions associated with the images must not reveal any provide information about children and other vulnerable people;
- third parties, individuals or organizations, different form the data subject whose personal data are processed in the photographs or videos, requesting access to personal data can access them once their right to access has been verified; beside they must sign an agreement outlining the proper use of such materials and confirming that the processing complies fully with applicable personal data protection laws and regulations. Failure to adhere to the terms may result in the termination of access permissions and the return of the data. Access to personal data must be by way of permission only.

Standards of decency and dignity and decorum for the subjects portrayed shall be granted and maintained and a balanced portrayal of reality shall be provided, to avoid exposing the persons portrayed to damages or risks.

Fondazione THSN ensures that:

- erotic, pornographic or obscene images shall never be used, held, received, assigned, distributed,

- disclosed and commercialized;
- all images portraying children and other vulnerable people are compliant not only with the applicable regulation on personal data protection, but also with traditions or restrictions of their country of origin;
- children and other vulnerable people are treated with respect, as equal partners in action and their capacities and aspirations emphasized, rather than solely their vulnerabilities and fears. Special attention shall be paid to persons with disabilities, refugees and those affected by emergency situations of conflict and disasters;
- in disaster situations, any publicity materials shall comply with the Code of Conduct of the International Committee of the Red Cross, portraying an objective image, not making unmotivated use of extreme suffering, co-operating with the media in order to encourage public response, but external or internal demands for publicity shall never take precedence;
- case histories and descriptions shall not be fabricated, so that the subjects would regard the image and its use as truthful; however, adaptation or edits may be made to preserve the dignity and confidentiality of the subject.

Any complaints or concerns about inappropriate or intrusive images shall be promptly reported, managed and recorded.

D. Rules of Behaviour

All THSN Volunteers shall sign and comply with the **“Rules of Behaviour for THSN Volunteers”** referred to in paragraph VI of this Policy, and which shall be followed within and outside the workplace.

III. THSN Partners

Agreements with THSN Partners shall include a clause providing that they undertake to acknowledge, undersign and fully comply with this Policy through the entire execution of the agreement. Moreover, THSN Partners shall be provided with, compile and undersign the **“Declaration for The Human Safety Net Partners to abide by and uphold The Human Safety Net Child and Vulnerable Adult Protection Policy”** referred to in paragraph VII of this Policy.

THSN Partners are also encouraged to adopt a protection policy, which shall fully comply with the principles and values set out in the THSN Policy.

All THSN Partners are expected to abide by their country’s child protection laws, if those laws do not go against the United Nations Convention on the Rights of the Child, 1989.

IV. Reporting Concerns related to this Policy

Anyone who experienced or witnessed any emergency situations or events presenting an immediate threat to life and dignity of children or vulnerable adults must immediately contact the competent authorities.

According to the Generali Group Code of Conduct, whose principles must be accepted by THSN Partners, anyone - also people external to the Generali Group - should be encouraged to report concerns on practices or actions they consider, in good faith, to be factually or potentially in breach of law, the Generali Group Code of Conduct itself and the other internal regulations following the principles described hereinafter.

Anyone, including people who are not Generali employees, who has experienced or witnessed a breach of this Policy involving a Generali Group employee shall report the breach to the relevant Local Focal

Point, when the reported breach is not significant. When the reported breach is significant, or if the person is not comfortable in sharing her/his concern to the Local Focal Point, or the Local Focal Point is involved, she/he should contact the [Generali Group Whistleblowing Helpline](#) and the competent Compliance Officer will manage the case accordingly with the *Generali Reporting Concerns and Anti Retaliation Group Guideline*.

When the author of the breach is not a Generali Group employee, anyone who has experienced or witnessed a breach of this Policy, including people who are not Generali employees, shall report it to the relevant THSN Partner. In this case, the THSN Partner shall provide anonymized information and timely update Fondazione THSN on how they are managing the case and the remedial measures taken (if any). Personal data can be shared between Generali and the THSN Partner only on the basis of the need-to-know principle.

Should anyone mistakenly report to the THSN Partner a breach of this Policy involving a Generali Group employee, the THSN Partner must immediately suggest and support the person to report to Fondazione THSN and inform Fondazione THSN that a case is going to be reported. The same applies if anyone mistakenly reports a case involving a person working for the THSN Partner to Fondazione THSN which shall suggest and support the person to report to the THSN Partner.

Any information received by Fondazione THSN or a THSN Partner must be treated seriously and with strict confidentiality and people reporting any breach of this Policy must be protected from any retaliation in accordance with applicable regulations. The same protection must be ensured to those conducting the investigations, facilitators and third persons, including legal entities, who are connected with the reporting persons and who could suffer retaliation in a work-related context.

When receiving sensitive disclosures from children or vulnerable adults, the receiver must strive not to re-traumatise them. If a child or a vulnerable person discloses that they are being, or have been, abused, the receiver shall:

- take the alleged abuse seriously; listen to and accept what the child or vulnerable adult says but not press for information;
- not investigate and not inform, question or confront the alleged abuser;
- inform Fondazione THSN or THSN Partner, which shall support the reporting of the abuse to the competent authorities and ensure specialist medical aids.

The priority shall always be the safety and best interests of the child or vulnerable adult.

This Policy requires an appropriate and prompt response to prevent and reduce the risk that the situation is perpetuated and that all individuals involved are clear on issues and actions to be taken.

Appropriate actions will be taken in the event that the allegation is substantiated, according to the relevant internal regulations.

V. Monitoring

The protection of children and vulnerable adults is taken into consideration by Fondazione THSN's in its reporting processes. Senior management and the Board of Directors shall regularly be updated on any safeguarding issues.

VI. Rules of Behaviour for THSN Volunteers

Fondazione THSN is committed to protecting the rights of children and vulnerable adults. Fondazione THSN believes that it is the responsibility of everyone working for and with THSN to ensure that children and vulnerable adults are protected from exploitation and abuse.

All THSN Volunteers are expected to treat children and vulnerable adults with respect and dignity, prioritising their safety and well-being at all times. The highest standards of behaviour are expected from all THSN Volunteers.

New THSN Volunteers can act on behalf of THSN and adhere to its initiatives only if they do not have any criminal charge, conviction and other outcomes of an offence that relate to exploitation and abuse.

In the course of their association with THSN, all THSN Volunteers must:

- treat children and vulnerable adults with respect and dignity regardless of ethnicity, gender, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status;
- avoid language or behaviour towards children and vulnerable adults that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate;
- not engage children and vulnerable adults in any form of sexual intercourse or sexual activity, including paying for sexual services or acts;
- use any computers, mobile phones, video cameras, cameras or social media appropriately, and never exploit or harass children and vulnerable adults or access exploitation material through any means;
- not use physical punishment on children and vulnerable adults;
- comply with all relevant local legislation, including labour laws;
- immediately report concerns or allegations of exploitation and abuse to the competent authorities and any breach of this Policy to the competent person(s) in accordance with the process described at paragraph IV of this Policy;
- notify the relevant Local Focal Points, without undue delay, that they cannot take part in THSN initiatives anymore, in the event of charges, convictions and other outcomes of an offence that relate to exploitation and abuse, which occurs during their association with THSN.
- ensure that another adult is present when working in the proximity of children;
- not invite unaccompanied children into their home, unless they are at immediate risk of injury or in physical danger;
- never sleep close to unsupervised children;
- not hire children for domestic or other labour which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury.
- guarantee appropriate gathering and use of communication materials, including asking permission and obtaining written informed consent, and when children are involved, asking the holder of the parental responsibility or guardian of the child;
- respect the dignity of the subject portrayed, including assessing and endeavoring to comply with local traditions and restrictions, and ensure that subjects are adequately clothed and not in poses that could be seen as sexually suggestive;
- ensure images are honest representations of the context and the facts, not manipulate the subject or an image to distort the reality of the situation, avoid stereotypes and aim to show people helping and working for themselves, not as victims.

Any failure to uphold the Rules of Behaviour may result in the termination of the volunteer's engagement with THSN, or in further disciplinary or judicial proceedings as outlined above.

Fondazione THSN shall reserve the right to inform other institutions which may apply for professional references of the termination of contract for serious violation of the principles of the protection of children within the legislative framework applicable to the protection of information.

VII. Declaration for The Human Safety Net Partners to abide by and uphold “The Human Safety Net Child and Vulnerable Adult Protection Policy”

(Name of THSN Partner)

hereby acknowledges that it has received and read a copy of “*The Human Safety Net Child and Vulnerable Adult Protection Policy*”.

The THSN Partner agrees to abide by “*The Human Safety Net Child and Vulnerable Adult Protection Policy*”.

The THSN Partner agrees to inform the relevant Local Focal Points of any suspicions and allegations of breach of this Policy that might occur in their organisation and cooperate as a condition of the partnership.

The THSN Partner agrees that all children and vulnerable adults have equal rights to protection from abuse, neglect, exploitation and violence, and that everyone has a responsibility to support their protection.

The THSN Partner accepts and commits to actively prevent acts of harm by its personnel and associates, and to respond to safeguarding incidents that are perpetrated against children and vulnerable adults in compliance with “*The Human Safety Net Child and Vulnerable Adult Protection Policy*”.

The THSN Partner ensures that no personnel hired, deployed or engaged in projects implemented in partnership with THSN or with the support of THSN, have ever been involved in any form of abuse, neglect, exploitation and violence against children and vulnerable adults before.

The THSN Partner ensures that all personnel hired, deployed or engaged in projects implemented in partnership with THSN or with the support of THSN, will participate in training on the content of “*The Human Safety Net Child and Vulnerable Adult Protection Policy*” and related standards of behaviours adopted by Fondazione THSN.

The THSN Partner is fully aware of being liable to suspension or cancellation of the partnership agreement with THSN should any of its personnel members or associates be found in breach of “*The Human Safety Net Child and Vulnerable Adult Protection Policy*” standards of behaviour, and the concern be mishandled.

Signature: _____

Name, Surname: _____

Title: _____

Organization: _____

THSN Partner since: _____

Date: _____ City/State: _____

VIII. Glossary

- **Abuse or maltreatment** - constitutes all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child or vulnerable adult's health, survival, development or dignity in the context of a relationship of responsibility, trust or power.
- **Child** - means every person under the age of 18.
- **Commercial or other exploitation of a person** - refers to the use of a child or vulnerable adult in work or other activities for the benefit of others. This includes, but is not limited to, child labour, exploitation of a person's vulnerabilities for commercial purposes and use of children or vulnerable adults for prostitution. These activities are to the detriment of the child and vulnerable adult's physical or mental health, education, or spiritual, moral or social-emotional development.
- **Contact with children or vulnerable adults** - means working on an activity or in a position that involves or may involve any interaction with children or vulnerable adults, no matter how minimal, where the contact would reasonably be expected as a normal part of the activity and the contact is not incidental to the activity. Contact can be due to volunteering, site visits, paid or unpaid work. This includes indirect interaction with children or vulnerable adults, through the use of media and communication materials.
- **Neglect** - is the failure to provide for the development of the child or vulnerable adult in all spheres: health, education, emotional development, nutrition, shelter, and safe living conditions, in the context of resources reasonably available to the family or caretakers and causes or has a high probability of causing harm to the child and vulnerable adult's health or physical, mental, spiritual, moral or social development. This includes the failure to properly supervise and protect children and vulnerable adults from harm as much as is feasible.
- **NGO** - Non-Governmental Organization included among THSN Partners.
- **Safeguarding** – a set of actions taken to make sure that organization's staff, operations, and programmes do no harm to children and vulnerable adults, that is that they do not expose them to the risk of harm and abuse.
- **Sexual abuse** – is the involvement of a person in sexual activity with an adult or another child who by age or development is in a relationship of responsibility, trust or power, the activity being intended to gratify or satisfy the needs of the other person. This may include but is not limited to:
 - the inducement or coercion of a person to engage in any unlawful sexual activity;
 - the instrumental use of a person in any form, for prostitution or other unlawful sexual practices; and
 - the exploitative use of children or vulnerable adults in pornographic performances and materials.
- **THSN** - The Human Safety Net, the Generali Group's flagship initiative for the Communities.
- **THSN Global/Fondazione THSN** – “Fondazione Generali-The Human Safety Net-Ente Filantropico” the non-profit organisation established by Assicurazioni Generali S.p.A., registered under Italian law and acting as the international operating vehicle for THSN.
- **THSN Global Focal Point** – Focal Point appointed at THSN Global level who, acting as THSN Local Focal Point for THSN Global, receives the reports referred to in par. IV of the Policy.
- **THSN Local** – Non-Profit Organisation, including Foundations both new and already established, to carry out THSN activities.
- **THSN Local Focal Point** – Focal Point appointed at THSN Local level to receive the reports referred to in par. IV of the Policy and embed and ensure the implementation of this Policy.
- **THSN Policy** - “The Human Safety Net Child and Vulnerable Adult Protection Policy”.
- **THSN Partner** - Any partner of THSN, including NGO partners implementing a THSN programme.
- **THSN Volunteer** - Generali employee who, as volunteer, participates in THSN activities and is registered on the dedicated platform.
- **Vulnerable adults** – people who are over 18 years of age and are getting, or may need, help and services to live in the community. Vulnerable adults may be unable to take care of themselves and unable to protect themselves from harm, discrimination or exploitation by other people.

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CHILD AND VULNERABLE
ADULT PROTECTION POLICY**

