



LOTO CHILD SAFEGUARDING POLICY

CODE OF CONDUCT AND PROCEDURES

LOTO is a Cultural Association based in Milan and designed to promote social and environmental volunteering experiences and learning-first travels in Italy and abroad.

The Association initiatives are oriented to all LOTO members¹ who want to change their way to discover our planet, by experiencing travels and encounters driven by the desire for knowledge and sharing.

To be a LOTO member is essential for everyone interested in LOTO activities and willing to participate in LOTO Partners' Projects. The mentioned Projects are selected thanks to monitoring trips which are organized and experienced by LOTO staff itself. All Project are run by local associations working on-field.

LOTO works inside a network of associations and NGOs, set both in Italy and in the rest of the world, which commit themselves to developing social and environmental Projects. LOTO collaborates with associations in India, Nepal, Madagascar, Myanmar, Thailand, and Italy – in particular in the areas of Emilia-Romagna, Abruzzo and Lampedusa Island.

About the definition of LOTO members, from now on, it will refer to people involved in LOTO activities and departing for one or more LOTO online-sponsored projects run by local partners.

The Association aims to raise awareness among future members, personally introduced and individually trained by LOTO staff to develop and adopt a more conscious approach to all experiences: it is necessary to be aware of the complexity of the environment before getting involved in it, both on a cultural and social level, establishing relationships based on a responsible, knowledgeable, and empathic attitude.

Information, training, and dissemination activities are essential to travel as active and engaged citizens.

As communities are one of the most critical assets in LOTO's daily work, one of the most important cornerstones of LOTO is that as conscious citizens, we all are required to safeguard and protect all children².

¹ Anyone sincerely interested in travel and volunteering-related citizenship initiatives and formally registered as a LOTO member through the annual renewal membership card.

² “Every human being below the age of eighteen years unless under the law applicable to the child, majority is attained earlier”. Convention on the Rights of the Child (OHCHR).

LOTO is committed to strengthening its Child Safeguarding system, promoting good standards to prevent and respond to acts of violence, exploitation, and abuse directed at all children.

This Policy will be shared with anyone working on behalf of LOTO, including staff, members, and Partners with the aim of extending the attention to the topic in any situation and place which children are involved in.

The purpose of this Policy statement is:

- To prevent and contrast any behavior ascribable to specific cases of sexual abuse and exploitation, sexual or moral harassment, forms of bullying and witnessed violence and any conduct that damages the dignity and honor of the person.
- To provide staff and members, as well as children, young people, and families/carers, with the overarching principles that guide LOTO approach to child protection.
- To communicate clear information on the matter, to explain the process that led to the drafting of the Policy and have to acknowledge the document itself.

Reflecting on the actions of all the actors involved, in terms of understanding, awareness and responsibility, it is crucial to achieve the highest level of safeguarding of direct or indirect underage beneficiaries.

The Policy measures are intended to be adopted to protect even the most vulnerable and defenseless beneficiaries, such as people with disabilities and the so-called "young adults", that is, subjects even over the age of 18 but who still show - due to their young age - marked characteristics of vulnerability.

LOTO *Child Safeguarding Policy* should be read in conjunction with:

- *LOTO Code of Conduct*;
- *LOTO Risk Assessment* in reference to the selected Project or activity of involvement;
- *LOTO Application Form e Agreement*.

LOTO Child Safeguarding Policy has been approved by LOTO's Board of Trustees and its Legal Representative. The Policy applies to all staff, members and associates.

Staff includes:

- ✓ all staff included the LOTO Board of Trustees;
- ✓ interns.

Members includes:

- ✓ volunteers;
- ✓ travelers;
- ✓ everyone participating in the activities and projects promoted by LOTO, online, in Italy or abroad;
- ✓ anyone in possession of the annual renewal membership card.

Associates includes:

- ✓ all contractors, e.g., consultants;
- ✓ all partners including local community-based partners.

What is Child Safeguarding?

Keeping Children Safe³ defines Child Safeguarding as "*the responsibility that organisations have to make sure their staff, operations, and programmes do no harm to children, that is that they do not expose children to the risk of harm and abuse, and that any concerns the organisation has about children's safety within the communities in which they work, are reported to the appropriate authorities.*"

Other crucial definitions for the understating of a Child Safeguarding Policy

Physical abuse	actual or potential physical harm perpetrated by another person, adult or child. It may involve hitting, shaking, poisoning, drowning and burning. Physical harm may also be caused when a parent or carer fabricates the symptoms of or deliberately induces illness in a child.
Sexual abuse	forcing or enticing a child to take part in sexual activities that he or she does not fully understand and has little choice in consenting to. This may include, but is not limited to, rape, oral sex, penetration, or non-penetrative acts such as masturbation, kissing, rubbing and touching. It may also include involving children in looking at, or producing sexual images, watching sexual activities and encouraging children to behave in sexually inappropriate ways.
Child sexual exploitation	a form of sexual abuse that involves children being engaged in any sexual activity in exchange for money, gifts, food, accommodation, affection, status, or anything else that they or their family needs. It usually involves a child being manipulated or coerced, which may involve befriending children, gaining their trust, and subjecting them to drugs and alcohol. The abusive relationship between victim and perpetrator involves an imbalance of power where the victim's options are limited. It is a form of abuse that can be misunderstood by children and adults as consensual. Child sexual exploitation manifests in different ways. It can involve an older perpetrator exercising financial, emotional or physical control over a young person. It can involve peers manipulating or forcing victims into sexual activity, sometimes within gangs and in gang-affected neighbourhoods. It may also involve opportunistic or organised networks of perpetrators who profit financially from trafficking young victims between different locations to engage in sexual activity with multiple men.

³ **Keeping Children Safe (KCS)** is an independent not-for-profit that aims to end children's abuse, exploitation and neglect in organisations worldwide. The organisation also set internationally recognised Child Safeguarding standards for organisations worldwide. LOTO is Keeping Children Safe full member from June 2022.

Neglect and negligent treatment	allowing for context, resources and circumstances, neglect and negligent treatment refers to a persistent failure to meet a child's basic physical and /or psychological needs, which is likely to result in serious impairment of a child's healthy physical, spiritual, moral and mental development. It includes the failure to properly supervise and protect children from harm and provide for nutrition, shelter and safe living/working conditions. It may also involve maternal neglect during pregnancy as a result of drug or alcohol misuse and the neglect and ill treatment of a disabled child.
Emotional abuse	persistent emotional maltreatment that impacts on a child's emotional development. Emotionally abusive acts include restriction of movement, degrading, humiliating, bullying (including cyber bullying), and threatening, scaring, discriminating, ridiculing or other non-physical forms of hostile or rejecting treatment.
Commercial exploitation	exploiting a child in work or other activities for the benefit of others and to the detriment of the child's physical or mental health, education, moral or social-emotional development. It includes, but is not limited to, child labour.

LOTO framework of reference for Child Safeguarding

- The Convention on the Rights of the Child's definition of a child

Article 1: "For the purposes of the present Convention, a child means every human being below the age of eighteen years unless under the law applicable to the child, majority is attained earlier".

- Convention on the Rights of the Child (CRC)

Article 19 "States Parties shall take all appropriate legislative, administrative, social and educational measures to protect the child from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s) or any other person who has the care of the child".

Our framework also refers to CRC Articles 32 to 36.

- Keeping Children Safe (as a Full Member)

KCS is an independent NGO whose mission is to end the abuse, exploitation and neglect of children in organisations worldwide.

- ECPAT– End Child Prostitution Pornography and Trafficking

ECPAT is an international network of organizations working in 102 countries and committed to protecting girls and boys from all forms of sexual exploitation, such as sex tourism, prostitution, pornography and trafficking for the purpose of sexual exploitation, in the world and through the web.

- "CODICE PSEAH - Protection from Sexual Exploitation, Abuse and Harassment"

A Code of Conduct for preventing and fighting harassment, abuse and sexual exploitation for the protection of the dignity of beneficiaries of interventions development cooperation and of the people who work and operate in the structures of the Italian agency for development cooperation and with the agency itself.

From the Italian Constitution:

- *LEGGE 3 agosto 1998, n. 269* Norme contro lo sfruttamento della prostituzione, della pornografia, del turismo sessuale in danno di minori, quali nuove forme di riduzione in schiavitù⁴.
- *LEGGE 27 maggio 1991, n. 176* Ratifica ed esecuzione della convenzione sui diritti del fanciullo, fatta a New York il 20 novembre 1989⁵.

LOTO guiding principles of Child Safeguarding

LOTO staff and members adhere to *LOTO Code of Conduct*, which sets out the values, principles, and accountability of the Association. With regards to the concept of safeguarding, LOTO believes in the following guiding principles and agrees to:

1. Assume that all children have equal rights to be safeguarded and protected from harm.
2. Consider the concept of Safeguarding as a priority for everyone involved in LOTO activities.
3. Take all actions on Child Safeguarding in the best interests of children, which are paramount.
4. Consider support for Child Protection and Safeguarding a shared responsibility for all.
5. Hardly work to create an environment in which children's rights are respected.
6. Empower children to understand their rights, particularly with regard to freedom from violence or any harm.
7. Build a safeguarding culture where staff, members, children, young people and their families/carers treat each other with respect and are comfortable with sharing concerns.
8. Let this Policy be undertaken and respected by all LOTO members, no matter where and at which level, involved in LOTO activities or in partners' Projects.
9. Inform children, families, carers, communities, employees and Partners on the LOTO commitment to child safeguarding and what to do if they have concerns about a child.
10. Let the staff, members, children, families, carers, communities, employees and Partners be aware of the designated Child Safeguarding Focal Point who is responsible for receiving reports of concerns and advising on assessing and mitigating risk in line *with LOTO Child Safeguarding Policy*.

⁴ "Law nr 269, 1998, August 3rd: norms against the exploitation of prostitution, pornography, sexual tourism damaging children and young adults, as new forms of slavery".

⁵ "Law nr 176, 1991, May 27th: ratification and execution of the Convention on the Rights of the Child signed in New York on 1989, November 20th".

11. Not harm any children with whom LOTO staff and members interact, both in activities directly promoted by the Association or during their involvement in the Partner's project. LOTO's Partners are committed to not inadvertently causing harm too.
12. Reject corporal punishment as a method of discipline and psychological and verbal abuse.
13. Identify an adult local staff member who will work as a mediator and a point of reference, during the interaction between LOTO members and one or more children.
14. Declare the obligation for all staff, members and associate to report on all concerns can emerge about a situation or case.
15. Use LOTO procedures to manage appropriately any allegations against staff and members.
16. Ask written or verbal authorization from the parents, legal tutors, carers or the contact person of the activity, before taking any picture or video of children or situation where children are dramatically involved. In case of denied consent, the decision must be respected.
17. Promote a measured and conscious use of technology to preserve and protect the dignity of children portrayed or filmed in vulnerable situations; LOTO consequently encourages a more careful and respectful use of social media networks and sharing tools.
18. Avoid the publishing of sensitive data concerning children.
19. Share with all LOTO staff and members the responsibility to support the Safeguarding and Protection of the children involved in local activities and as direct or indirect beneficiaries of the Partners' Projects.
20. Share information about Safeguarding and good practice with children and their families/carers via leaflets and posters in the project's areas as well as in NGOs registered Offices.
21. Encourage all Partners to draft policies aligned with LOTO procedures.
22. Share tools and strategies to meet the minimum requirements on Child Safeguarding if Partners still need to elaborate their policies.
23. Have the responsibility to help partners meet the minimum requirements on protection.
24. Ask Partners to share with LOTO's on-site members, as well as with LOTO Child Safeguarding Focal Point, the updated legislation of the Country on the matter.
25. Respect the codes implicit in diverse cultures related to relationships, parenting, teaching, family, privacy, and use of appropriate clothing.

Recruitment

LOTO will ensure that it applies the highest standards in its recruitment and vetting policies across the Association. New members, collaborators and Partners are checked for their understanding of Child Safeguarding principle, their suitability for working with children and their operative policies and procedures on the topic.

As a part of its recruitment policies and practices, LOTO will:

- outline its commitment to Child Safeguarding in the official Association documents, in the Partners contract and during the selection and training of departing members.
- Recognizing the institutional and social significance of orphanages, strictly limits the involvement of its members in this and other kinds of shelters and buildings where children are more vulnerable; LOTO firmly distances itself from the Orphanage voluntourism phenomenon and its evident negative impacts.
- Carefully consider each member's involvement in all kinds of institutional children care, always considering the beneficiaries' interest and in complete confidence of the training and coaching work concerning the interaction with underage beneficiaries, promoted directly, or set in collaboration with the partners.
- Obtain proof of identity from each departing member.
- Ask all members, whether involved in social or environmental Projects or in LOTO promoted activities, to provide their certificates of criminal records and pending charges or any substitutive declaration indicating the Court which has jurisdiction over the place of residence.
- Deliver a training module on Child Safeguarding and the responsibility under the Policy upon engagement to all members, at the time of their engagement with the Association, along with *LOTO Child Safeguarding Policy*.
- Provide a moment when it will be possible to discuss the Policy, ask questions and raise any concerns with the Child Safeguarding Focal Point.

Protection checks, such as the evidence of identity and the request of a disclosure of previous convictions represent an important part of our recruitment policy and covers all those representatives that we have a collaboration with.

Reporting procedures

LOTO undertakes to establish mechanisms aimed at raising awareness, preventing, and reporting cases of abuse as well as any child protection measures, such as suspension, revocation and removal from the project and remote activities.

LOTO recognizes the need to provide appropriate, accessible, and clear report procedures for all its members. As in most cases, the Association's interaction with children occurs only through on-site and abroad members in charge of local partners, the staff has decided to create a specific LOTO email (lotochildsafeg@gmail.com), where to send and report any case of suspected or actual abuse and available to all.

Moreover, LOTO guarantees members involved in activities promoted by the association or by local Partners in Italy and abroad, project managers and members' coordinators, with the

opportunity to call or text LOTO staff 24/7 on the association's mobile phone. In any case, anonymity will be guaranteed.

These tools will be shared among all LOTO members and local Partner's staff, by the mediation of the on – site Project Manager.

Partners will be asked to share the indications and expose, with the methods mentioned above, to the project's beneficiaries and all people involved *LOTO Child Safeguarding Policy*' details.

If members were to find themselves in a situation where a child or young person tells them they are being, or have been, abused they should:

- ❖ Listen to and accept what the child or young person says but do not press for information.
- ❖ Let the child or young person know what they are going to do next and that they will let them know what happens.
- ❖ Do not investigate and do not inform, question or confront the alleged abuser.
- ❖ Take the alleged abuse seriously.
- ❖ Record carefully what they have heard on the reporting email tool.

Identifying information about children will be shared on a 'need to know' basis only. Any staff who raise concerns of serious malpractice will be protected as far as possible from victimization or any other detrimental treatment if they come forward with serious concerns, provided that concerns are raised in good faith.

The subject of the complaint (alleged perpetrator) and all witnesses must cooperate fully and openly with internal and statutory investigations and hearings. Their confidentiality will be protected and information which could identify them will be shared on a 'need to know' basis only.

Deliberate false allegations are a serious disciplinary offence and will be investigated.

Disciplinary actions

In the event that a LOTO member, involved in on-site activities, is suspected of any abuse, security, LOTO will suspend him/her in advance from the activity, will revoke his/her nominal LOTO membership card and will remove him/her from the project itself, in Italy or abroad.

The decision taken by LOTO will be unquestionable, and s/he will not be allowed to ask for any reimbursement or compensation.

LOTO is responsible for the pre-departure training phase, for the information communicated through its official documents, for the *lotochildsafe@gmail.com* report mailbox and its availability 24/7 on the association's mobile phone towards members involved in activities promoted by the association or by local Partners in Italy and abroad, project managers and members' coordinators.

However, Members act under their full responsibility and will be directly considered responsible for possible consequences; no responsibilities will be attributed to LOTO on behalf of both s/he and third

parties. LOTO members undertake all civil and criminal liability deriving from their actions and omissions (and consequential caused damages to third parties), false statements and reticence.

In any case LOTO would request external support from an expert entity, identified in the NGO Keeping Children Safe, to better address the situation and decide which steps to take.

In case of proven abuse, always led by the external support of KCS and following its internal procedures, LOTO would act according to the guidelines established by national and international laws and would report to the authorities in charge (police, social services, etc.).

Child Safeguarding Focal Point's contacts and responsibilities

LOTO designates Camilla Danesi, LOTO's administrator, as LOTO's Child Safeguarding Focal Point.

CONTACT INFORMATION FOR LOTO'S CHILD SAFEGUARDING FOCAL POINT

NAME AND POSITION: CAMILLA DANESI, ADMINISTRATOR

EMAIL CONTACT: CAMILLA@LOTOFTRAVEL.COM

The Child Safeguarding Focal Point is responsible for managing *LOTO's Child Safeguarding Policy*, in particular, by ensuring that:

- She is committed to continuous learning and maintain good practices.
- She is trained in Child Safeguarding.
- She guarantees the privacy and confidentiality of all information and situations shared with her, including by not sharing any sensitive information with people who are not involved in the managing process of the precise situation (go to Disciplinary actions).
- Children and their parents/carers with whom LOTO interacts (in person or remotely) will be informed on the Policies and procedures implemented. This point will eventually include ensuring they have access to a child-friendly version of this document (to be completed by December 2023).
- This Policy is reviewed on an annual deadline.
- To actively participate in LOTO supported projects, members have provided the certificate of their criminal records and pending charges or a substitutive declaration.
- All Partners have shared with LOTO their safeguarding Policy or, at least, have signed LOTO Child Safeguarding Policy.
- LOTO holds itself accountable to the highest standards of Child Safeguarding, including by acting promptly and being as transparent as possible about its actions.

Annex A

LOTO Child Safeguarding Code of Conduct

Members acknowledge that they have read and understand LOTO Child Safeguarding Policy, and agree that in the course of my involvement with LOTO, they must:

- Treat children with respect regardless of gender, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- Not use parlance or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- Not engage children under the age of 18 in any form of sexual intercourse or sexual activity, including paying for sexual services or acts.
- Wherever possible, ensure that a member of the local partner is present when being involved with children's activities.
- Not invite unaccompanied children into areas not used for the activities or private facilities/spaces.
- Use computers, mobile phones, video cameras, cameras or social media appropriately, and never to exploit or harass children or access child exploitation material through any medium.
- Not use physical punishment on 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.
- Comply with all relevant local legislation, including labour laws in relation to child labour.
- Immediately report concerns or allegations of child exploitation and abuse and policy non-compliance in accordance with appropriate procedures.
- Immediately disclose all charges, convictions and other outcomes of an offence, which occurred before or occurs during their involvement in LOTO activities that relate to child exploitation and abuse.

When photographing or filming a child or using children's images, members must:

- Assess and endeavour to comply with local traditions or restrictions for reproducing personal images before photographing or filming a child.
- Obtain informed consent from the child and parent or guardian of the child before photographing or filming a child. As part of this, members must explain how the photograph or video will be used.
- Ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
- Ensure images are honest representations of the context and the facts.
- Ensure file labels, meta data or text descriptions do not reveal identifying information about a child when sending images electronically or publishing images in any form.

Members understand that the onus is up to them, as LOTO members, to use common sense and avoid actions or behaviours that could be construed as child exploitation and abuse.

Declaration of Acceptance

LOTO Child Safeguarding Policy will be included among the documents, listed in the *LOTO Application Form and Agreement*, to be signed and viewed by all members before departure.

By signing this last document, all members declare in front of LOTO staff to be informed about and to agree with:

- LOTO's vision, mission, and commitment.
- All procedures set out in *LOTO Child Safeguarding Policy*, together with *Annex A*.
- their responsibilities and therefore their commitment to avoiding actions or conduct that could be interpreted as child abuse.
- LOTO zero tolerance for any violation of *LOTO Child Safeguarding Policy*. Any violation will result in the activation of the consequent and necessary disciplinary measures.