



Child Protection Policy



March 1st, 2022

Dear colleagues and friends,

During 2021 the ST Foundation, in order to strengthen the protection of minors within its projects and to implement concrete actions to prevent all forms of violence and abuse against them, has started a process of updating its organizational procedures concluded with the preparation of this Child Protection Policy and the related Code of Conduct.

This Child Protection Policy has been developed in compliance with the best international standards for the protection of children's rights, taking into account the principles and values of the ST Foundation and the specific characteristics of the different contexts in which it operates.

The ST Foundation, therefore, now also has an ad hoc policy aimed at making minors aware of their rights as well as the protection procedures activated to make their protection effective.

Best regards,

Pietro Palella

Child Protection Policy and Code of Conduct

INDEX

- 1. PREMISE**
- 2. PURPOSE OF THE POLICY**
- 3. LEGISLATION OF REFERENCE AND PRINCIPLES**
- 4. DEFINITIONS / GLOSSARY**
- 5. RECIPIENTS OF THE CHILD PROTECTION POLICY**
- 6. PREVENTION MEASURES AND STANDARDS**
 - 6.1. *Human Resources***
 - 6.2. *Partners Requirements***
 - 6.3. *Internal Organisation***
 - 6.4. *Training and Awareness***
- 7. CODE OF CONDUCT**
 - 7.1. *Dos***
 - 7.1. *Don'ts***
- 8. PROTECTION AND REPORTING**
- 9. ANNEXURES**

1. PREMISE

The STMicroelectronics Foundation (hereinafter also referred to as the "ST Foundation") is a non-profit organisation based in Geneva, founded by STMicroelectronics NV in 2001 and currently operating in several countries.

The Mission of the ST Foundation is to develop, coordinate, and sponsor projects that use modern science and high technology to promote the fight against the Digital Divide by identifying computer illiterates, particularly in the world's less privileged communities.

The establishment of the STMicroelectronics Foundation was the concrete reply to the requests of engagement and commitment of the UN Information and Communication Technologies Task Force (UN ICT TF) by former UN Secretary-General Kofi Annan.

The purpose of the UN Task Force on ICTs was to help build concrete solutions to bridge the digital gap that afflicts billions of people trapped in extreme poverty, keeping them from enjoying the benefits that the digital revolution was and still is bringing to the global economy.

Therefore, STMicroelectronics NV, a member of the Task Force since the very beginning, decided to make an active contribution to this initiative by creating a dedicated foundation that, on the one hand, has a Mission in line with the goals of the UN ICT Task Force and, on the other hand, can translate its corporate values and strong social commitment into concrete literacy initiatives carried out onsite, especially in geographical regions where social, economic, and technological inequalities hinder human and economic growth.

STMicroelectronics NV is indeed characterized by an entrepreneurial style focused on sustainability and social responsibility towards its internal and external stakeholders; the choice of operating in this direction has been enhanced through the adoption of some corporate documents such as 1) Code of Conduct, 2) Sustainability Charter; 3) Company Presentation; as well as through the promotion and adhesion to the following international agreements/declarations: 1) *United Nations' Universal Declaration of Human Rights*; 2) *United Nations Global Compact* (UNGC); 3) *Responsible Business Alliance* (RBA).

Accordingly, these principles and reference values that distinguish STMicroelectronics NV also characterize ST Foundation that set them in context based on its Mission.

Since 2004, the ST Foundation has published an annual report detailing the results attained and the social impact generated through the training initiatives undertaken in the countries where it operates to bridge the Digital Divide.

The Digital Unify Program is the core computer literacy initiative used by the ST Foundation to deliver the benefits of digital technology by providing free tools and training in computer skills.

The ST Foundation operates in countries with very heterogeneous regulatory, social, and economic environments through the involvement of on-site staff and, in some cases, STMicroelectronics employees acting as ST Foundation volunteers.

For this reason, the ST Foundation, to fully benefit and protect its stakeholders, has decided to give a homogeneous, concrete, and flexible structure to its ethical-value system, focusing on the adoption of specific policies and procedures that safeguard the beneficiaries of its activities and all other parties that come into contact with it.

To this end, the ST Foundation has first and foremost decided to:

- start from the "Stakeholder Engagement" approach (already used also by STMicroelectronics NV for the implementation of its sustainability policies) for the delivery of its support, awareness, and information literacy programs
- Guarantee the utmost respect at all organisational levels and in every project area for human rights as recognized by the Universal Declaration of Human Rights approved by the UN in 1948 as well as by the other international covenants in force on the subject.

2. PURPOSE OF THE POLICY

This Child Protection Policy (hereinafter, also the "CPP") lies on the principle confirmed by Article 3 of the Convention on the Rights of the Child, according to which the best interests of the child must always guide the ST Foundation's choices and actions in defining and carrying out its charitable activities.

Considering that the ST Foundation operates mainly in economically backward areas of the world where the environment, due to poverty, carries higher risks of child abuse, the ST Foundation, through this Child Protection Policy, is committed to protecting and promoting the rights of children who come into contact with the organisation, directly or indirectly.

Therefore, the purpose of this policy is:

- strengthen the capacity of the organisation to prevent and respond to any child protection concerns with concrete actions;
- increase the awareness and understanding among its own staff and related personnel and the communities in which it operates about all child safeguarding concerns.

To this end, the ST Foundation protects children through the following areas of intervention:

Awareness

The ST Foundation works to ensure that staff, volunteers, board members, and partners are aware of the abuse, neglect, and exploitation of children and young people and the potential associated risks.

Moreover, because of the conditions of backwardness in many countries in which it operates and its educational mission, the ST Foundation acts to make children more aware of the risks they may face.

Prevention

The ST Foundation aims to ensure that the risk of abuse is reduced by disseminating good practices, creating a safe and child-friendly environment, raising awareness of children's rights, and encouraging their participation in protection measures that allow them to play an active role in upholding their own rights.

Reporting

The ST Foundation ensures that those involved in implementing its activities have a clear understanding of the measures and procedures to be taken to promptly report and deal with potentially dangerous situations for children.

Response

The ST Foundation ensures that there is always a response, irrespective of how bad the abuse is and whether it is alleged, proven, or attempted. In this way, the ST Foundation ensures the application of a transparent and fair procedure, avoiding unfair convictions and protecting the rights of all stakeholders.

3. LEGISLATION OF REFERENCE AND PRINCIPLES

- *“The child must be given the means requisite for its normal development, both materially and spiritually”* - **Declaration of the Rights of the Child**, Society of Nations, Geneva, 1924, first point.
- *“The child shall enjoy special protection, and shall be given opportunities and facilities, by law and by other means, to enable him to develop physically, mentally, morally, spiritually and socially in a healthy and normal manner and in conditions of freedom and dignity. In the enactment of laws for this purpose, the best interests of the child shall be the paramount consideration”* - **Declaration of the Rights of the Child**, ONU, 1959, principle 2.
- *“In all actions concerning children, whether undertaken by public or private social welfare institutions, courts of law, administrative authorities or legislative bodies, the best interests of the child shall be a primary consideration”* - **Convention on the Rights of the Child** - ONU, 1989, article 3, paragraph 1, ratified by Switzerland on 24 February 1997 and entered into force on 26 March 1997.
- *“The purposes of this Convention are to: a prevent and combat sexual exploitation and sexual abuse of children; b protect the rights of child victims of sexual exploitation and sexual abuse; c promote national and international co-operation against sexual exploitation and sexual abuse of children”* - **Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse**, European Council, Lanzarote, 2007, Article 1, ratified by Switzerland on 18 March 2014 and entered into force on 1 July 2014.
- *“In all actions relating to children, whether taken by public authorities or private institutions, the child's best interests must be a primary consideration”*- **Charter of fundamental rights of the European Union**, EU, 2012, article 24, paragraph 2.

Given the aforementioned reference legislation, ST Foundation believes that the protection of children is effective and appropriate only when a constant intervention based on respect for their rights is promoted.

Specifically, ST Foundation, to achieve appropriate prevention, protection, and intervention framework, is committed to respecting and implementing the following **key principles** of the Convention on the Rights of the Child (In short, CRC):

1. Non-discrimination (Article 2 CRC)
2. The best interests of the minor (Article 3 CRC)
3. Survival and development (Article 6 CRC)
4. The right to be heard (Article 12 CRC)

Therefore, ST Foundation in the development of its Projects:

- Values and treats every person without discrimination of any kind, irrespective of the age, race, colour, sex, language, religion, political opinion or other opinions, national, ethnic or social origin, language, gender identity or sexual orientation, property, disability, birth, or another status;
- Recognises the right of every child to be protected from harm and abuse and takes all necessary action to prevent any harm from being done against children and report abuse against children;
- The best interest of the child always comes first in the undertaking of its activities;
- Promotes the children's right to be heard and share their views and supports this approach in its activities.

4. DEFINITIONS / GLOSSARY

Cultural factors have a significant impact on the issue of child abuse and influence every aspect of it, from its onset and definition to its treatment and prevention; therefore, it is essential to start applying the CPP from the knowledge of the environment in which the educational intervention is implemented.

Child abuse finds fertile ground in all contexts of poverty, inadequate nutrition, lack of education, no or inaccessible health care, as well as social upheaval, conflict, and war.

In this respect, the “Report of the Consultation on Child Abuse Prevention”, 29-31 March 1999, WHO, Geneva, clearly highlights that “Awareness of cultural factors must remain high as they influence all aspects of the problem from the occurrence and definition of abuse through its treatment and to its successful prevention. Any intervention, to be successful whether for data gathering, prevention or even increasing public awareness, must take into consideration the cultural environment in which it is to occur...”

General definition and proposed classifications¹

Child abuse or maltreatment

It 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's health, survival, development, or dignity in the context of a relationship of responsibility, trust, or power.

Child

In line with Article 1 of the UN Convention on the Rights of the Child (1989), a child is defined as "... every human being below the age of eighteen years unless under the law applicable to the child, majority is attained earlier".

Victim

A person who is a victim of abuse or attempted abuse. For the purposes of this policy, persons who report abuse committed against them are treated as survivors for security and need assessments.

Child abuse or exploitation can take many forms that include, for example, the following:

Physical abuse

The physical abuse of a child results into the actual or potential physical harm from an interaction or lack of an interaction, which is reasonably within the control of a parent or person in a position of responsibility, power or trust. There may be a single or repeated incidents.

Emotional abuse

Emotional abuse includes the failure to provide a developmentally appropriate, supportive environment, including the availability of a primary attachment figure, so that the child can develop a stable and full range of emotional and social competencies commensurate with her or his personal potentials and in the context of the society in which the child dwells. There may also be acts towards the child that cause or have a high probability of causing harm to the child's health or physical, mental, spiritual, moral, or social development. These acts must be reasonably within the control of the parent or person in a relationship of responsibility, trust, or power. Acts include restriction of movement, patterns of belittling, denigrating, scapegoating, threatening, scaring, discriminating, ridiculing or other non-physical forms of hostile or rejecting treatment.

¹ The definitions and classifications used in this CPP are based on the Convention on the Rights of the Child (UN, 1989) and the Report of the Consultation on Child Abuse Prevention (WHO, 1999).

Neglect and negligent treatment

Neglect is the failure to provide for the development of the child in all fields: health, education, emotional growth, 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's health or physical, mental, spiritual, moral, or social development. This includes the failure to properly supervise and protect children from harm as much as is feasible.

Sexual abuse

Child sexual abuse is the involvement of a child in sexual activity that he or she does not fully comprehend, is unable to give informed consent to, or for which the child is not developmentally prepared and cannot give consent, or that violate the laws or social taboos of society. Child sexual abuse is evidenced by this activity between a child and 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 child to engage in any unlawful sexual activity.
- The exploitative use of children in prostitution or other unlawful sexual practices.
- The exploitative use of children in pornographic performances and materials.

Exploitation

Commercial or other exploitation of a child means the use of a child in work or other activities for the benefit of others. This includes, but it is not limited to, child labour and child prostitution. These activities are to the detriment of the child's physical or mental health, education, or spiritual, moral, or social-emotional development.

Online Abuse

Online abuse is any type of abuse perpetrated via the Internet. It can happen across any device connected to the web, like computers, tablets, and mobile phones. And it can happen anywhere online, including:

- Social media
- Text messages and messaging apps
- Emails
- Online chats
- Online gaming

- Live-streaming sites.

Children can be at risk of online abuse from people they know or from strangers. It might be part of other abuse which is taking place offline, like bullying or grooming. Or the abuse might only happen online.

5. RECIPIENTS OF THE CHILD PROTECTION POLICY

This CPP addresses the following categories of persons for whom it is to be considered binding:

1. The members of the Board of Directors, management, employees, and volunteers involved in all ST Foundation projects;
2. Consultants and other external collaborators of the ST Foundation, considered as providers of services of an intellectual nature who participate in the implementation of ST Foundation projects.
3. Schools, local authorities, associations, or other public or private organizations, as well as their employees, collaborators, and volunteers, who work in partnership with the ST Foundation on projects in which there is direct or indirect contact with children.

Compliance with this CPP must be ensured in both professional and private life.

The ST Foundation will require all external partners, whether individuals, associations, or companies, to undertake to comply with this CPP and ensure that their employees and collaborators do so.

7. PREVENTION MEASURES

6.1 Human Resources

Working with the ST Foundation requires that the Board of Directors, staff, consultants, volunteers, interns, and all those acting in any capacity on behalf of it, accept this CPP by signing a commitment to its principles and procedures.

The ST Foundation adopts the following prevention measures with specific reference to the selection of human resources:

- Staff, consultants, volunteers, and interns are recruited through notices of selection that contain a clear description of the work to be performed, the organisational role, and the assumption of responsibility related to compliance with and implementation of this CPP.
- A portion of the hiring interview is devoted to explaining this CPP and verifying the candidate's understanding of the importance to the ST Foundation of its proper implementation.

- The ST Foundation's CPP membership clauses are an integral part of any ST Foundation contract or partnership agreement (MOU).
- Before starting to collaborate with the ST Foundation, the eligible candidate must sign, under his/her responsibility, a self-certification stating his/her criminal convictions and knowledge of pending charges.

From human resources working in direct contact with children, we also expect that:

- The eligible candidates must provide the personal and contact information of two qualified, verifiable references, not from their family members, with whom they have had dealings for no less than two years, which substantiate their experience and suitability for working with children.
- The eligible candidates provide the ST Foundation with a criminal record certificate or other similar document attesting to the absence of convictions and charges pending for crimes incompatible with the performance of a job of any type exercised in contact with children.²

The ST Foundation is empowered to sanction, with both conservative and expulsive disciplinary measures, conduct by its human resources in violation of this CPP.

6.2 Partners Requirements

Any external partner cooperating with the ST Foundation in organising projects involving children must have its own CPP or subscribe to the ST Foundation's CPP.

Where the Partner has a CPP with a code of conduct and reporting procedures, the measures in this CPP may be replaced by those in use by the Partner, but only if they give equal to, or greater assurance than, those in this CPP.

In working with its Partners, the ST Foundation ensures that the following assurance procedures are followed:

- Prior to the signing of any contract or partnership agreement, conduct an assessment of the Partner's commitment to preventing the risk of abuse and its ability to respond effectively to any harm suffered by the child; repeat the assessment periodically during its execution. The assessment must also take into account how the Partner interacts with children, as well as the specific risks associated with the type of activity and context of implementation.

² The ST Foundation adopts the Directive 2011/93/EU on combating the sexual abuse, sexual exploitation of children, and child pornography as a normative reference.

- Partners who collaborate with the ST Foundation are required to provide a written statement of adherence to the CPP and the behaviours required by it and acknowledge this in the contract or partnership agreement. The declaration shall be signed by the legal representative, who will undertake, in turn, to obtain from their employees and collaborators in any capacity, adherence to this CPP to participate in Projects with the ST Foundation. If the Partner uses its CPP because it is deemed appropriate by the ST Foundation, this shall be acknowledged in the contract or partnership agreement.
- Whenever possible, the ST Foundation provides training support to Partners to help them identify child abuse risks and define the relevant mitigation measures to be taken within the jointly implemented Project, as well as to develop their own CPP.

Any issues arising in relation to the protection of children by the Partners shall not automatically result in the termination of the contract or partnership agreement.

The ST Foundation carries out a specific assessment of the criticality of each situation and decides to continue or not the collaboration, taking into account the nature and seriousness of the event, the reaction of the Partner, and its commitment to cope with and manage the incident.

For instance, the ST Foundation proceeds by noting whether the child's best interests have been given primary consideration, advice on how to manage the situation has been implemented, there is a willingness by the Partner to follow a course of training and instruction on the critical issues that have emerged.

6.3 Internal Organisation

The ST Foundation identifies the following figures to whom it assigns a key role in implementing this CPP.

Child Protection Officer, acronym CPO.

It is the figure identified by the Board of Directors to operate at a central level, which carries out the following functions:

- Promotes awareness and implementation of this CPP throughout the organisation.
- Monitors the implementation of this CPP and reports on its development to both the Child Protection Working Party and the Board of Directors.

- Oversees the training of human resources directly involved in dealing with children and any other prevention processes or activities related to this CPP.
- Maintains a high level of knowledge and updating on current/adopted international child protection standards and practices.
- Represents a reference and a source of qualified information for human resources on this CPP and the subject of child protection;
- Receives and evaluates reports sent to it by the CPC or received directly; directs and supervises the work of the CPC;
- Always informs the CPWP of the reports received and, if necessary, also convenes it as a matter of urgency.

Child Protection Working Party, acronym CPWP

It consists of the Child Protection Officer, the Child Protection Coordinators, a member delegated by the Board of Directors, and any outside consultants. Meets at least once a year to review the implementation of the CPP and the progress of local situations and any referrals.

It can also be convened urgently by the Child Protection Officer if there are particularly critical situations that require a preliminary discussion on the decision to be taken.

Child Protection Coordinator, acronym CPC

The figure identified by the Child Protection Officer after consulting with the Board of Directors who operates at the peripheral level with the functions described in point 8 below on Protection and Reporting procedures.

The CPC is specifically familiar with the applicable local legislation on child protection and reports to the CPO any necessary changes or additions to the CPP at the local level, as well as any additional provisions to be included in the MOUs.

Local Reporting Officer, acronym LRO

It is the figure identified by the Child Protection Coordinator after consulting with the Child Protection Officer who operates at a peripheral level with the functions described in point 8 below on Protection and Reporting procedures.

6.4 *Training and Awareness*

The ST Foundation considers training and awareness to be essential elements of implementing its CPP. This priority implies that:

- Upon induction or during the induction period, the Board of Directors, the staff, the consultants, the volunteers, and the interns, receive training on this CPP and related procedures.
The training also covers what to do for those operators in direct contact with children and what information regarding children is relevant and should be disclosed or not. In this way, in the case of abuse, the human resources involved in the specific ST Foundation project are enabled to promptly activate effective forms of support for the victims and their families.
- Child protection training will be provided in a manner tailored to each role and responsibility. Therefore, the Board of Directors, the staff, the consultants, the volunteers, the interns, and anyone acting in any capacity on behalf of the ST Foundation will be adequately informed of, and regularly updated on, the contents of this CPP.

The names and contact details of the key figures referred to in 6.3 above (internal organisation) will be clearly displayed in the ST Foundation's CPP documentation, and all human resources personnel are made aware of them from the outset.

Disclosure of personal information about children - including lawsuit information - is limited to Board members, staff, consultants, volunteers, interns who must necessarily be made aware of it.

The Board of Directors has overall responsibility for overseeing and ensuring the implementation of the CPP.

Specific procedures and control tools that are part of this CPP are mentioned in Section 8 below, which is devoted to protection and reporting procedures, including response procedures and monitoring and evaluation processes. The CPP is an integral part, from the outset, of the development and implementation of all ST Foundation Projects.

8. CODE OF CONDUCT

The ST Foundation is committed to protecting children and taking all necessary steps to minimize the risk of abuse or exploitation episodes that might occur on the occasion of and as a result of the implementation of its Projects.

It is therefore committed to responding to all reports, whether of actual or alleged abuse, according to this CPP, regardless of the nature of the report, the reporting party, or the suspect person. This Code of Conduct contains indications of ethical and correct standards of behaviour that adults should have towards children. Such indications, developed with the children's best interest in mind, should always be interpreted with the utmost transparency and common sense.

The Board of Directors, the staff, the consultants, the volunteers, the interns, and all those acting in any capacity on its behalf, as well as Partners, support this CPP and are committed to maintaining an environment that minimizes the risk of violence or abuse to children.

The following are some virtuous behaviours that the recipients of this CPP must keep, and others that, being inappropriate, they should never engage in.

7.1 Dos

CPP recipients shall commit to:

1. Organise activities in such a way as to minimize risks in each work context;
2. Protect children in all settings in which the ST Foundation operates. This includes taking more safeguards in activities involving children;
3. Maintain a safe and protective environment for children in their learning, recreational, and work areas with which the ST Foundation or its Partners come into contact;
4. Know and follow the reporting procedure;
5. Promote the protection of children's rights through their teaching and ethically oriented behaviour;
6. Treat all children with empathy, respect, dignity, and in the same manner regardless of gender, language, ethnicity, religion, nationality, or ability;
7. Maintain non-violent, non-discriminatory, and positive behaviour with children;
8. Develop children's skills and competencies and discuss with them their rights and what they can do if any problems arise;
9. Respect the rights of every child and treat them honestly and with dignity;
10. Encourage the participation of children so as to develop their ability to protect themselves;
11. Be aware of which behaviours constitute abuse or exploitation;

12. Be able to recognize signs of abuse and immediately report any suspicions to the local reporting officer;
13. Keep a high personal and professional profile;
14. Prevent access and not expose children to inappropriate electronic material;
15. Be two adults at all times or, as much as possible, be visible to other adults while working with children;
16. Always seek and obtain written permission from children and their parents before taking photographs, recording or using images of children, or reporting their stories.
17. Always explain to children and parents how photos, videos, or messages will be used. In any case, the materials must never be harmful to the dignity of children.

7.2 Don'ts

Moreover, it is important that CPP recipients comply with the following prohibitions:

1. Use language that is discriminatory, offensive, demeaning, inadequate, or otherwise inappropriate in the cultural context in which it fits, is offensive, or of a sexual nature when speaking with or in the presence of a child;
2. Discriminate against, humiliate, belittle, or disparage children, including anything that may be considered emotional abuse;
3. Use physical or humiliating punishment on children;
4. Hit or otherwise physically assault children;
5. Touch a child inappropriately or when there is a perception of the child's discomfort;
6. Engage in behaviours or actions that may be considered inappropriate or potentially offensive practices;
7. Engage in any type of sexual activity with anyone under the age of 18 regardless of the definition of age of majority or how consent is legally recognized in different countries. A misconception about the age of a child is not considered an acceptable defence;
8. Tolerate violations of this code by other recipients of this CPP;
9. Remain alone with a child under circumstances that may be deemed inappropriate by a third party;

10. Kiss, hug, caress, rub or touch a child in a way that is inappropriate even for the cultural context in which the child lives;
11. Take photographs, make videotapes, or solicit personal information if not required for ST Foundation activities;
12. Misuse accounts, including children's social media accounts, outside of ST Foundation Programs;
13. Establish or maintain ongoing contact with children beneficiaries using personal online communication tools (e-mail, chat, social networks, etc.);
14. Use the organisation's computer or other equipment to view, download, create or distribute inappropriate material, such as material with pornography or violent contents;
15. Engage in behaviours that set a negative example for children;
16. Give money or goods or other benefits to a child outside the parameters and purposes established by the project activities;
17. Tolerate or participate in conduct by children that is illegal or abusive, or it puts their safety at risk.

This list is not exhaustive or exclusive. The basic principle is that recipients of the CPP must avoid actions or behaviours that may be inappropriate or potentially abusive to children.

Obligations and prohibitions will also necessarily vary according to the geographical areas in which they are to be applied, taking into account the different environments in which the recipients will be operating.

To tailor the reporting process to each context, the ST Foundation may define and agree upon specific in-field procedures together with the Partner. These procedures will then be officially included in the respective MOUs.

9. PROTECTION AND REPORTING

Please, note that, due to its organisational and operational characteristics, the ST Foundation carries out its training activities in European and non-European countries that have different social, economic, and regulatory contexts.

The rules of conduct and abuse prevention are general, and we provide additional rules for those who have direct dealings with children. Another differentiation may be provided according to the specific local context where the risk of abuse is higher.

Therefore, the following procedures must be adopted locally and provided for in the MOU signed by the partner to make the ST Foundation capable of responding promptly to abusive behaviour.

If the project is conducted in partnership, the ST Foundation and the Partner will jointly identify a Local Reporting Officer (LRO) to whom children can easily refer.

LROs will be trained in how to manage the reporting process, including appropriate behaviour when dealing with children.

Children will be given a clear explanation of who the Reporting Officer is, what his/her duties are, and how to contact him/her if they have a report to make.

In the event of a report, the Reporting Officer should report to the Child Protection Coordinator (CPC) of the ST Foundation, or its local representation listed in the MOU.

In turn, the CPC shall notify the CPO without delay.

In the event of a report:

- Any abuse, whether suspected or confirmed, must be seriously evaluated regardless of who makes the report and who the reported person is.
- Any person working in any capacity on an ST Foundation project has a responsibility to inform the LRO if they have concerns about the safety and well-being of children.

In the case of suspicion:

If a staff member in any capacity on an ST Foundation project witness, suspects, or receives a report of abuse, he/she must immediately notify the LRO. If the suspect is the very LRO, the reporter must immediately notify CPC that will proceed on his/her behalf, immediately notifying the CPO.

After receiving the report, the CPO, after hearing the CPC, shall evaluate if the danger is internal to ST Foundation or one of its Partners or external. If the danger is internal, the CPO must decide if it is necessary to address the national authorities; in this case, the CPC, under the supervision of the CPO,

shall report to the competent authority and follow the developments, acting accordingly. If it is not necessary to address the authority, the CPO and the CPC will follow the procedures of the CPP from the very beginning.

If the danger is external to the organization, the CPO, after hearing the CPC, should consider whether the danger is caused by the way the Project has been organized and then decide if it is necessary to report to the local authority.

If the danger is caused by the way the activity has been organized, the CPO has to decide if it is necessary to address the national authorities. In this case, the CPC, under the supervision of the CPO, shall report to the competent authority and follow the developments accordingly; if it is not necessary to address the authority, the CPC shall follow the procedures of the CPP from the beginning.

It is understood that under no circumstances may the CPC proceed with the filing of the complaint without the express permission of the CPO.

Moreover, the LRO shall:

- Ensure the protection and confidentiality of the person who discovered the abuse.
- Avoid all contact between the person accused of abuse and the alleged victim.
- Protect the alleged victim and give him/her all the support he/she immediately needs (psychological, medical, legal).
- Make a verbal record of the reporter's account and complete the Incident Report Form (if possible, the Report should be accompanied by a recording of the testimony).
- If the alleged perpetrator of the violence is the CPC, the report should be made directly to the Child Protection Officer.
- The LRO or CPC shall contact the alleged victim's family and inform them of the incident and the assistance provided.
- The interests of the alleged victim must always be considered paramount throughout the procedure.

In order to adapt the reporting process to each context, the ST Foundation staff may define and agree on specific procedures with the Partner. These procedures will be officially included in the respective MOUs.

10. ANNEXURES

- A. CPP Organisation Chart
- B. Flowchart for Raising Concern
- C. CPP Function Chart
- D. Checklist for Safe Recruitment and Selection
- E. Statement of Commitment to ST Foundation CPP
- F. Incident Report Form
- G. FAQ
- H. Contact Information
- I. Risk mapping
- J. Declaration of Criminal Conviction
- K. Checklist for prospective Partners
- L. Character References
- M. Statement of Commitment to ST Foundation Child Protection Policy CPO e CPC and assignment
- N. Statement of Commitment to ST Foundation Child Protection Policy LRO and assignment
- O. Addendum to the MOU
- P. Letter of intent ST_ ST Branches