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LINKS

Strengthening links between technologies and society for European disaster resilience

D1.5 ETHICS AND SOCIETAL IMPACT STRATEGY

Report

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EXECUTIVE SUMMARY

About the project

LINKS "Strengthening links between technologies and society for European disaster resilience" is a comprehensive study on disaster governance in Europe. In recent years, social media and crowdsourcing (SMCS) have been integrated into crisis management for improved information gathering and collaboration across European communities. The effectiveness of SMCS on European disaster resilience, however, remains unclear, due to the use of SMCS in disasters in different ways and under diverse conditions. From this point of departure, the overall objective of LINKS is to strengthen links between technologies and society for improved European disaster resilience, by producing sustainable advanced learning on the use of SMCS in disasters**.** This is done across three complementary knowledge domains**:**

1. Disaster Risk Perception and Vulnerability (DRVP)
2. Disaster Management Processes (DMP)
3. Disaster Community Technologies (DCT)

Bringing together 15 partners and 2 associated partners across Europe (Belgium, Denmark, Germany, Italy, Luxembourg, the Netherlands) and beyond (Bosnia & Herzegovina, Japan), the project will develop a framework to understand, measure and govern SMCS for disasters. The LINKS Framework consists of scientific methods, practical tools, and guidelines addressing researchers, practitioners, and policy makers. It will be developed and evaluated through five practitioner-driven European cases, representing different disaster scenarios (earthquake, flooding, industrial disaster, terrorism, drought), cutting across disaster management phases and diverse socioeconomic and cultural settings in four countries (Denmark, Germany, Italy, the Netherlands). Furthermore, LINKS sets out to create the LINKS Community, which brings together a wide variety of stakeholders, including first-responders, public authorities, civil society organisations, business communities, citizens, and researchers across Europe, dedicated to improving European disaster resilience through the use of SMCS.

About this deliverable

The Ethics and Societal Impact Strategy (SIS) defines the responsible conduct for the project, in compliance with European Code of Conduct and Research Integrity, the Ethics Policy of the European Commission established for the HORIZON 2020 Programme, and all relevant national and European legislation (see Section 2.1).

The activities of the LINKS project concerning possible ethical issues are primarily related to data collection (Section 3.2), which involves human interaction through (but is not limited to) interviews,

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workshops, participatory research and surveys, and to the publishing of the research results, which involves co-authoring, rights to data and publications, as well as governance and decision-making. Moreover, some of the activities will involve social groups that require specific ethics guidelines, such as those for minors and vulnerable groups (see Section 3.1). All consortium partners must adhere to the guidelines provided by this strategy and will refer to it for any matter relative to research governance.

The strategy is composed of five sections. It starts with an overview of the project (Section 2), then describes how LINKS approaches ethics issues in research (Section 3), defines how ethics will be monitored throughout the project (Section 4), explains the rights and duties of the partners (Section 5), and illustrates the potential societal impacts of the project and how to achieve them (Section 6).

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TABLE OF CONTENTS

1. Introduction 9
2. Overview of the project from an ethics perspective 10
2.1 International, EU, and national regulations, guidelines and standards 10
3. Main ethical considerations for research involving human subjects 13
3.1 Diversity awareness 14
3.1.1 Gender perspective 16
3.1.2 Protection of minors 17
3.1.3 Vulnerable groups 18
3.2 Research methods and data collection 18
3.3 Research procedures 20
3.3.1 Recruitment of participants 20
3.3.2 Privacy/Anonymity 21
3.3.3 Setting research and workshops and preventing risks of physical and psychological effects 22
3.3.3.1 Further recommendations working with minors in workshops 24
3.3.4 Other procedures 25
3.3.4.1 Data transcription 25
3.3.4.2 Handwritten notes 25
3.3.4.3 Social media 25
3.3.4.4 Visual/audio recording 26
3.3.4.5 Use of deception and covert research 27
3.3.4.6 In case of unexpected situations 27
3.4 Informed consent 28
3.5 Data management 31
4. Ethics assessment 35
4.1 Ethics self-assessment 35
4.2 Ethics advisory 38
4.2.1 Ethics advisory components and roles 38

This project has received funding from the European Union's Horizon 2020 Research and Innovation Programme under Grant Agreement No. 883490

4.2.2 EA and NEA tasks: general overview and interrelations 41
4.2.3 Focal points on research activity 42
5. Responsibilities and rights of consortium partners 44
5.1 Recruitment 44
5.2 Research integrity 44
5.3 Safety and well-being of workers 46
5.4 Insurance 47
5.5 Conflicts resolution 47
6. Societal Impact Strategy (SIS) 49
6.1 How LINKS will identify societal impact of the project 50
6.2 Societal impact self-assessment and reports 54
6.3 Stakeholders of the SIS 55
6.3.1 Practitioners 56
6.3.2 Policy and decision makers 56
6.3.3 Scientific community 56
6.3.4 Industry 56
6.3.5 Citizens 57
6.3.5.1 Civil society 57
6.3.5.2 Vulnerable groups 57
7. Conclusion 59
8. Bibliography 60
9. Annexes 63
Annex 1: Child safeguarding policy and code of conduct 63
Annex 2: General procedure for reporting and responding to suspected maltreatment, abuse or exploitation of children 77

This project has received funding from the European Union's Horizon 2020 Research and Innovation Programme under Grant Agreement No. 883490

LIST OF TABLES

Table 1. Ethical research roadmap 13
Table 2. Diversity in research tasks 16
Table 3. Procedures for informed consent 30
Table 4. Storage of data (example)..... 33
Table 5. Ethical aspects concerning data in planning research 34
Table 6. SIS Roadmap..... 51

LIST OF FIGURES

Figure 1: Flow chart of the ethics self-assessment procedure 36

LIST OF ACRONYMS

Abbreviation / Acronym	Description
CA	Consortium Agreement
DCT	Disaster Community Technologies
DaMP	Data Management Plan
DMP	Disaster Management Process
DPO	Data Protection Officer
DRPV	Disaster Risk Perception and Vulnerability
EA	Ethics Advisor
EAB	Ethics Advisory Board
EB	Executive Board
EC	European Commission
EOS	European Organisation for Security
ERA	European Research Area
EU	European Union
FAIR	Findable, Accessible, Interoperable and Reusable

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GA	Grant Agreement
GDPR	General Data Protection Regulation
ICF	Informed Consent Form
LCC	LINKS Community Center
LCW	LINKS Community Workshop
NEA	National Ethics Authority
NGO	Non-Governmental Organization
OECD	Organization for Economic Co-operation and Development
P(A)R	Participatory (action) research
PC	Project Coordinator
PGIS	Participatory Geographical Information Systems
PPA	Participatory Poverty Assessment
REA	Research Executive Agency
SC	Steering Committee
SIC	Safety Innovation Center E.V.
SIS	Societal Impact Strategy
SMCS	Social Media and Crowdsourcing
UCC	Københavns Professionshojskole
UN	United Nations
UNIFI	Università degli Studi di Firenze
VU	Stichting VU
WHO	World Health Organization
WP	Work Package
WPL	Work Package Leader

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1. INTRODUCTION

This document identifies and addresses the ethics issues that may arise in the LINKS project to promote an ethics strategy for research development. The strategy defines the responsibilities of partners in the project, concerning the collection, storage, use and analysis of research data and results within the framework of the LINKS project. Moreover, the document provides information on how the rights and safety of the project partners and the participants are preserved throughout the project. In particular, the principle of proportionality, the right to privacy, the right to personal data protection, the data minimisation principle, the FAIR (Findable, Accessible, Interoperable and Reusable) Data Principles, the right to physical and mental integrity of each person, the right to non-discrimination, and the need to ensure high levels of human health protection, have been considered writing this strategy. Thus, the main purpose of this document is to ensure that the LINKS research and outputs are in line with applicable international, European Union (EU), and national laws, as well as the H2020 guidelines and ethical standards (see Section 2.1), and to provide the LINKS partners with a comprehensive ethics strategy to follow in their work.

In addition, within the LINKS project framework it is planned to establish a comprehensive system of ethics consultants (see Section 4). This document details the responsibilities of these qualified entities and the decision-making mechanisms to conduct the continuous monitoring of the ethical concerns in the project with regards to human beings; personal data; EU and non-EU countries; environment; health; safety of partners and participants involved in the activities; research design and results.

The periodic monitoring of the LINKS project adherence to these guidelines and protocols is the responsibility of Università degli studi di Firenze (UNIFI) and the Ethics Advisory Board (EAB) with the support of the other foreseen external experts. On the basis of the results of the ethics monitoring and assessment tasks in the consortium (detailed in Section 4), UNIFI will provide periodic reports as established in the Grant Agreement (GA) (D1.6 and D1.7), and specific ethics requirements will be defined in Work Package (WP) 10. As this strategy is a living document, it will be updated during the project at any time when required.

Last but not least, this document details the LINKS Societal Impact Strategy (SIS) (Section 6), which has the aim of defining responsibilities and opportunities that the project has towards society. The SIS has the ambition to link the principles at the basis of LINKS project to a strategy for targeting the societal impacts of the project for key groups of stakeholders.

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2. OVERVIEW OF THE PROJECT FROM AN ETHICS PERSPECTIVE

The LINKS project aims to generate knowledge and sustainable advanced learning on the use of social media and crowdsourcing (SMCS) for disaster resilience in Europe. In particular, LINKS will develop a Framework which can be used to understand, measure and govern SMCS for disasters, through a study with addresses diversity among disaster risk perception and vulnerability (DRPV), disaster management processes (DMPs), and disaster community technologies (DCT) across Europe. To support these ambitions, the project will embed its research within five dedicated European case studies, through engagement with targeted groups of stakeholders (i.e. practitioners, researchers, policy makers, industry, citizens) within the LINKS Community.

Accordingly, the objectives and research which take place in LINKS require an international and multi-disciplinary approach which engages with individuals and other networks on various levels to better understand and test our assumptions relating to concepts of risk, crisis management, SMCS and diversity in disasters. The topics which form the core of LINKS are complex and often sensitive, and involve engaging with diverse communities with different backgrounds, perceptions, skills, knowledge and levels of awareness. For these reasons, research in LINKS requires due care for the identifying and monitoring of ethical issues and considerations in all activities. These include carful considerations for the ways in which LINKS partners engage with participants in research activities, the ways in which the collection, use and management of data is communicated to participants, and considerations for both the positive and negative impacts which the project could produce.

Moreover, this strategy also guides partners on ethical issues in the work packages (WP) and project which are not concerned with research, such as areas relating to dissemination activities, project staffing, and conflict resolution within the consortium. The diversity of the LINKS consortium is indeed a strength, which will work to better inform the research and outputs in the project, owing to different backgrounds, professions and experiences among partners Nevertheless, the partners must be open to assessing their own positions from an ethical perspective within the activities and work of the consortium during the lifetime of the project. The work and research activities in LINKS should always be conducted following the ethical and regulatory recommendations provided in this strategy, which align with overarching principles in the context of EU-funded research.

2.1 International, EU, and national regulations, guidelines and standards

Ethical principles, in conjunction with legal considerations, are an integral part of the whole project work plan. According to Section 4 (Other rights and obligations) of the GA, consortium partners agree to respect the following duties that concern ethics:

- Article 32 – Recruitment and working conditions for researchers
- Article 33 – Gender equality
- Article 34 – Ethics and research integrity

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- Article 35 – Conflict of interests
- Article 36 – Confidentiality
- Article 37 – Security-related obligations
- Article 38 – Promoting the action – Visibility of EU funding
- Article 39 – Processing of personal data

This strategy should be considered an implementation of GA duties, providing information that can help partners to organize their work. Moreover, this strategy is a starting point to answer to Section 34.2 of GA according to which 'ethics requirements' will be set out as deliverables. Accordingly, this strategy will be supported by specific tasks in WP10, that will provide details on procedures and criteria that will be used to identify and recruit research participants, information sheets and informed consent, data processing, measures to protect vulnerable groups and to minimise risks, such as incidental findings policy (D10.1); opinions/approvals by Ethics Committees (ECs) and National Ethics Authorities (NEA) (D10.2); appointment of national Data Protection Officers (DPOs), description of the anonymisation/pseudonymisation techniques, technical and organisational measures to safeguarding the rights and freedoms of the data subjects and research participants, security measures that will be taken to prevent unauthorised access to personal data and the equipment used for processing them (D10.3); and the appointment of an independent Ethics Advisor (EA) (D10.4).

Furthermore, The LINKS project ethics issues highlighted in this document refer to, but are not limited to, the following international and EU regulations about human rights, privacy, and protection of personal data. National rules and instruments pertaining to research ethics will be taken into consideration throughout the project by partner countries and by the NEAs which will be assessing the human research components of the project, as defined in D10.2. Partners will further work, with the support of the NEAs, to ensure national regulatory compliance when necessary and applicable, particularly when doing research/work/tests within those countries.

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List of the main international and EU regulations:

- Universal Declaration on Human Rights (1948)
- European Convention on Human Rights (1953) and its Supplementary Protocols
- OECD Guidelines on the Protection of Privacy and Transborder Flows of Personal Data (1980)
- Council of Europe's Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data (1980)
- Directive 95/46/EC of the European Parliament and of the Council on "Protection of individuals with regard to the processing of personal data and on the free movement of such data" (1995)
- Directive 96/9/EC of the European Parliament and the Council on the "Legal protection of databases" (1996)
- Convention No. 108 of the Council of Europe for the "Protection of Individuals with regard to Automatic Processing of Personal Data" (1997)
- Recommendation No. R (97) 18 of Committee of Ministers to Member States concerning the "Protection of personal data collected and processed for statistical purposes" (1997)
- Directive 2000/31/EC of the European Parliament and of the Council on "Certain legal aspects of information society services, in particular electronic commerce, in the Internal Market (Directive on Electronic Commerce)" (2000)
- Directive 2002/58/EC of the European Parliament and of the Council concerning "The processing of personal data and the protection of privacy in the electronic communications sector (Directive on privacy and electronic communications)" (2002)
- Treaty on European Union and the Treaty on the Functioning of the European Union (TEU and TFEU), consolidated version (2007)
- Charter of Fundamental Rights of the European Union (2009)
- ISO/IEC 29100/2011: Security techniques — Privacy framework (2011)
- EU regulation No. 1291/2013: HORIZON 2020 - the Framework Programme for Research and Innovation (2014-2020) and repealing Decision No 1982/2006/EC (2013)
- Decision No. 2013/743/EU: establishing the specific programme implementing HORIZON 2020 - the Framework Programme for Research and Innovation (2014-2020) and repealing Decisions 2006/971/EC, 2006/972/EC, 2006/973/EC, 2006/974/EC and 2006/975/EC (2013)
- European Code of Conduct for Research Integrity (Revised edition) (2017)
- EU Ethic and data protection (2018)
- ISO/IEC 27001/2018: Information security management systems — Requirements (2018);
- ISO/IEC 27552/2019: Security techniques — Extension to ISO/IEC 27001 and ISO/IEC 27002 for privacy information management — Requirements and guidelines (2019)
- General Data Protection Regulation (GDPR) (2016)

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3. MAIN ETHICAL CONSIDERATIONS FOR RESEARCH INVOLVING HUMAN SUBJECTS

This section provides the projects ethical roadmap, as well as the ethical considerations and guidelines that all LINKS partners are committed to respect, regarding the main research activities developed in the project in which ethics issues could arise. Table 1 presents the ethical research roadmap, showing the distribution of the main ethical considerations in relation with the methods expected to be used in WP where research is planned in accordance with the GA. It represents a high-level guide that LINKS partners can use to identify the main ethical tasks to answer in planning research. A second ethical research roadmap, where ethics considerations are detailed at task level, will be produced and shared by the EAB with the consortium at the end of Month 6. It will also be updated periodically before research activities take place.

Table 1. Ethical research roadmap

Activity	WP	Period	Location	Research Method	Ethics Considerations
Development of Knowledge Bases and Methodologies	WP2 -4	M6-12	Netherlands Denmark Italy Germany Japan	Surveys/Questionnaires Interviews (computer assisted; walking interviews, …) Participatory (action) research (P(A)R) Focus Groups/Workshops Ethnographic research (e.g. Participant observation) Social media data analysis	Diversity awareness (3.1) Participants recruitment (3.3.1) Privacy/Anonymisation (3.3.2) Participants (physical and psychological) protection (3.3.3) Other procedures in research (3.3.4) Informed consent (3.4) Data protection and management (3.5)
Evaluation of LINKS Framework	WP6	M6-34	Netherlands Denmark Italy Germany Japan	Surveys/Questionnaires Interviews P(A)R Focus Groups /Workshops	Diversity awareness (3.1.) Participants recruitment (3.3.1) Anonymisation (3.3.2) Participants (physical and psychological) protection (3.3.3)

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					Other procedures in research (3.3.4) Informed consent (3.4) Data protection and management (3.5)
Implementation and management of LINKS Community Center (LCC)	WP7	M16-42	Netherlands Denmark Italy Germany (Public)	Online Engagement Online surveys/questionnaires Interviews	Diversity awareness and protection (3.1) Accessibility (3.3) SMCS (3.3.4.3) Participants recruitment (3.3.1) Informed consent (3.4) Data protection and management (3.5)
LINKS Community Workshops (LCWs)	WP8	M6-42	Netherlands Denmark Italy Germany Luxembourg Bosnia and Herzegovina	P(A)R Focus Groups/Workshops	Diversity awareness (3.1) Accessibility (3.3) Participants recruitment (3.3.1) Participants (physical and psychological) protection (3.3.3) Informed consent (3.4) Data protection and management (3.5)

The following sub-sections proceed as follows. First, guidelines are provided about diversity related ethics issues in project research, as diversity awareness is a key component in the LINKS work plans and processes (Section 3.1). From an ethics perspective, these include considerations related to gender (3.1.1), the involvement of minors (3.1.2), and vulnerable groups (3.1.3) in LINKS activities. Thereafter, Section 3.2 defines the research and data collection methods used in the project. Finally, research procedures are described to guide researchers in respecting and solving ethical issues during research activities in Section 3.3.

3.1 Diversity awareness

Diversity plays a crucial role in LINKS on various levels with regards to the main topic of study. The effectiveness of SMCS in disasters is linked to producing sustainable advanced learning among

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individuals and groups with from different backgrounds and experiences. This idea is embedded in the LINKS research design in and the expected outputs in the project, including a dedicated Diversity Awareness Strategy which will be finalized in Month 6.

From an ethical perspective, all LINKS partners undertake to observe the principle of human dignity which states that any human should be respected, independent of their age, gender, socio-economic condition, ethnicity, sexual orientation and religion, rejecting discrimination, oppression, prejudice, stereotype and inequality. Accordingly, the LINKS consortium understands that each individual is unique and allows for the creation and maintenance of a positive research environment, wherein the similarities and differences of individuals are valued. Thus, the LINKS consortium aims to deliver inclusive project results, deliverables and outcomes, and gives great importance to eliminating inequalities and related barriers.

Diversity is addressed in this strategy focusing specifically on three categories: gender, minor age and vulnerability as important dimensions of the LINKS research (see Table 2). The idea of diversity as interpreted in this strategy is not limited to these three groups (as mentioned above), but a specific focus on them is required according to the relevance they have in disaster studies and the LINKS research, including the unique perspective they can offer in participatory processes dealing with SMCS in disasters. In particular, LINKS aims to discuss the intersectionality of the three categories and how this can impact on community's vulnerability in terms, e.g., of accessibility to i-tec solutions or exclusion from the public debate about disaster risk management. The specific focus on their involvement, therefore, brings with it important ethical considerations which must be elaborated from more general guidelines in the strategy.

A further clarification needs to be made here: according to the definition provided in Section 3.1.3 about vulnerable groups, gender and minors could be considered sub-categories in specific contexts. However, this strategy argues that diversity is not only a vulnerability factor but also one of resilience. Indeed, LINKS strives to highlight the resilience capacity of diversity in addition to vulnerability aspects. This interpretation of diversity should not restrict partners from exercising care and specific ethical considerations when dealing with diverse and vulnerable groups, as discussed in the following sections.

The Table below identifies the tasks in which diversity will be considered in LINKS research and how. Note, further indications about the impacts of research on diversity and vulnerable groups are provided in Section 6 on Societal Impact, in particular which procedures (in terms of monitoring and mitigating) to follow to avoid that research produces negative impacts on participants and local communities.

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Table 2. Diversity in research tasks

Main activity	Tasks	Diversity dimension	Description
Literature review	T2.1, T2.2	Gender/Sex	Identifying gaps and discussing potential implications of sex/gender and age in terms of risk perception, awareness and vulnerability
		Age/Minors	
		Vulnerability	Identifying socially vulnerable groups and providing an in-depth definition for the LINKS Framework
Collecting and elaborating data	T2.3	Gender/Sex	Sex and age as variables of risk perception and vulnerability, analysed as a sex-disaggregated data, to consider in relation with other personal markers
		Age/Minors	
		Vulnerability	Considered in the developing of the DRPV methodology
	T3.2, T.4.2, T6.2, T6.3, T6.4	Gender/Sex	WP2 will provide all other WPs an integrated perspective on these categories (e.g. WP5), that research partners could incorporate in own data collection and elaboration and in the LINKS framework if relevant for them
		Age/Minors	
		Vulnerability	
Field research	T2.4, T2.5, T2.6, T3.3, T3.4, T3.5, T4.3, T4.4, T4.5 T6.2, T6.3, T6.4 T8.2	Gender/Sex	Adopting a gender-sensitive perspective in building research tools, analysing results, organizing thematic working groups. In LINKS events (like workshops and training sessions), no discrimination based on gender will be done in selecting participants (see Section 3.3.1). Information about sexual orientation will be never asked to participants
		Age/Minors	Adopting a multi-age approach in research and a minors-sensitive perspective in building surveys, analysing results, organizing thematic working groups; specific guidelines for minors' protection described in Section 3.1.2
		Vulnerability	Adopting a vulnerability perspective in building surveys, analysing results, organizing thematic working groups; vulnerable groups may be invited to participate in the activities (see Section 3.1.3)

3.1.1 Gender perspective

Gender, ethical and legal considerations are firmly embedded in the project work plan as established in the LINKS gender strategy. Accordingly, a gender-sensitive perspective will be adopted

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throughout the LINKS project as part of the broader Diversity Awareness Strategy. This will be ensured adopting the following different research strategies:

- First, implications of gender in disaster risk reduction will be considered in all three knowledge domains about DRPV, DMP and DCT (see Table 2). In particular, gender will be read not only as an individual characteristic in risk analysis according to the idea that gender aspects play a relevant role within individual coping capacity and vulnerability, but also how gender, social and cultural roles and stereotyping shape, for instance, disaster risk perception and procedures, and communication and interaction between professionals/authorities and the public.
- Second, gender balance will be sought within involved participants communities in the research, with participation (when possible) as close as possible to 50/50 or with the aim to ensure an equal participation of different gender representatives to provide data on the different gender experience and ideas dealing with risks.
- Third, gender perspectives will be integrated into the development of the LINKS framework, providing gender-based tools, solutions and guidelines with a gender-neutral language. LINKS partners will also facilitate, develop and promote a range of research activities aimed at ensuring that the benefits/societal impacts of the project are made available to all genders, on a fair and equitable basis, while fulfilling the different needs.

3.1.2 Protection of minors

Children and youth may be involved in research activities of the LINKS project, according to WP2, with an objective to consult a wide range of young people (12-18 years old). Accordingly, the targeting of the areas of work will be selected in order to represent the diversity of cultures and understand the ways children of different cultures experience disasters/emergencies. All the participants, and especially Save the Children Italy, have the responsibility to supervise the activities that include minors and to do everything in their power to prevent, report and respond to potential threats for them during the development of the project (see Section 3.3). The highest standards must be adhered to at all the times by all the LINKS partners. Furthermore, all the partners must be aware that LINKS will have to adapt to the General Procedure (attached to this strategy) adopted by Save the Children Italy to signal cases of abuse or maltreatment to children. This is compulsory for all the partners. In case of maltreatment, abuse or exploitation, including of a sexual nature, partners will follow the guidelines contained in the Safeguarding Policy (attached to this strategy), according to Save the Children's internal disciplinary procedures and current national legislation. If necessary, Save the Children will provide specific support in case one of the partners will involve children in their activity. This will be discussed at the EAB once the ethical research roadmap has been produced at task level.

Before research that involve minors take place, project staff and people involved in the activities must confirm they have read and completed the Child Safeguarding Check List that Save the Children

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Italy will provide. For project staff without experience in Child Safeguarding, Save the Children Italy will organize a Child Safeguarding training, a workshop where LINKS members will be trained to follow specific rules and procedures. The check-list and the training plan will be provided for approval after that EAB will be established and in agreement with it.

3.1.3 Vulnerable groups

Research activities may involve vulnerable people. Vulnerability is at the basis of the project, that aims to give more attention to the needs of vulnerable groups and improve their resilience. In this strategy, vulnerable groups are all groups of people with a high level of exposure and risk. Accordingly, socially vulnerable groups and temporary vulnerable groups are included. The first group includes all the people socially and economically disadvantaged that live in situations of marginalization due to one or more socio-economic characteristic, like gender, age, illness, disability, ethnicity, low-income, and also those affected by intended or unintended consequence of political agendas which can produce exclusion. Accordingly, this group includes (but is not limited to) minors, elderly people, refugees, irregular migrants, people with physical or mental disabilities, cronic-ill people, ethnic minorities. Temporary vulnerable groups include people that could have a strong resilience but, due to specific circumstances, are temporarily exposed to risks or lack the coping capacity to deal with the risk, like traumatized people, tourists, volunteers, and first responders.

All research activities will be planned to avoid negative impacts on the vulnerability of the participants (see more on this in Section 6). Vulnerable groups will be involved in the project activities only when necessary. Further, the activities developed will work to prevent re-traumatising and harming of participants (see also Section 3.3.3).

3.2 Research Methods and Data Collection

Research activities which involve data collection with humans will take place in Denmark, Germany, Italy, Netherlands, and potentially Luxembourg, Bosnia and Herzegovina, and Japan. All data collection will be carried out in full compliance with national privacy and data protection laws. Partners who initiate data collection will first receive approval from the local NEAs (Section 4) of countries in which those activities will take place, in accordance with WP10 H_Reg_No. 2 (D10.2). They must further receive approval for their research plans at task level by the LINKS EAB before research activities may be carried out (Section 4). In general, data collection should be handled with due care with respect to national and EU legislation highlighted in Section (2.1). As LINKS specifically and predominantly apply social scientific methods for data collection, the project will follow ethical principles concerning social science methods, such as the Science Europe Social Science Committee's guides for ethics, and further comply with ethical principles of relevant scientific and research associations in the countries where research will be carried out.

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LINKS envisions several ways of human participation in the research data collection across different WPs (see also Table 1). Data will be collected through different scientific methods, including semi-structured and open-ended interviews, computer assisted personal interviews, P(A)R including focus group interviews and stakeholder engagement workshops, live and digital ethnography, and through the analysis of social media data, (see box below about the main methods of research that are expected to be used in LINKS). Since COVID-19 could make it difficult to do field-work activities as planned in LINKS, research may also be done using online platforms and technological tools. In case this happens, this strategy will be integrated in order to answer to the specific ethics questions linked to these research methods.

Methods of research

Surveys, questionnaires and interviews: A research participant engages directly with the project, by answering questions (e.g.) in an interview (that can be, e.g., open-ended, semi-structed, walking or computer assisted personal interview) or completing a structured or semi-structured survey/questionnaire (e.g. Clifford et al., 2016).

Participatory (action) research – P(A)R: Researchers and participants are working together to discuss a problem and to identify the best solution for the specific context. The PAR approach emphasises the purpose to reach social changes, challenging inequalities. Several methods are used during PAR research, like focus groups, Participatory Geographical Information Systems (PGIS), Participatory Poverty Assessments (PPA), and so on (e.g. Kindon, Pain and Kesby, 2007). Of particular interests in LINKS is the use of workshops, which are defined as the "meeting of people to discuss and/or perform practical work in a subject or activity" (Cambridge Dictionary) and Living Labs, defined as "user-centred, open innovation ecosystems based on systematic user co-creation approach, integrating research and innovation processes in real life communities and settings" (ENOLL, n.d.).

Ethnographic research methods: They are qualitative methods that include participant/direct observation, diary studies, video recording, and those methodologies in which researcher observes people during their daily life (e.g. LeCompte and Schensul, 2010).

Social media data analysis: set of methods (data extraction and tools) to analyse and process data coming from social media adopting a quantitative approach. Aggregating data, these methods offer perspectives on how topics are discussed and perceived and how different audiences use social media (e.g. Sloan and Quan-Haase, 2017).

As general principles, participants should be informed and asked for their consent before research activities and data collection begins. Data collection should be conducted using digital audio recording devices, after seeking permission of research participants. When research participants indicate to not wish to be recorded, detailed note-taking may take place. Data will be collected in line with the "data minimisation principle", which stipulates that collected data is "adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed"

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(GDPR, art. 5). This entails that no irrelevant information or contact details will be asked from research participants. Should research participants mention such details, this will be omitted from the transcriptions. On a general ethical level, LINKS will respect the right to private life of any individual, implying first and foremost that confidentiality and anonymity of the person in relation to research data will be ensured. Each partner remains responsible for anonymisation/pseudonymisation of data so as to prevent retrospective identification of research participants. All partners are further responsible for the secure and efficient use and management of data which they collected. Further information and procedures regarding the recruitment of participants, privacy and anonymity considerations, informed consent, and data management are elaborated in the following sections.

3.3 Research procedures

3.3.1 Recruitment of participants

The selection of participants will be in accordance with the ethical standards of the project and will be carried out without any discrimination in accordance with the principles of human dignity and the Diversity Awareness Strategy discussed in Section 3.1.

In particular, research activities will take place respecting the principle of 'accessibility', interpreted as:

- Physical accessibility (see also setting for research activities in Section 3.3.3)
- Economic accessibility, according to which participation will be always free in order to guarantee accessibility to all the people
- Information accessibility, according to which all participants must have been provided with full information, according to the principle of transparency, about research and use of data
- Cultural/language/intellectual accessibility (see also Section 6)

All the parts of the project responsible for activities that involve minors will guarantee the opportunity to participate without discriminating or excluding any participant based on gender, language, disability, income or any other reason.

All the partners will contribute to avoid that situations of stigmatization occur during research activities, and that all the participants can express themselves freely without a feeling of judgement.

During any activity, participants will be reminded that they can stop or limit their participation when they desire. They will be asked if they desire to share their individual experiences with the other participants and with researchers but they will never be forced to do this. Research participants will always be allowed to refuse participation or to remove themselves from prior stated commitments to participate. According to the principle of transparency, persons will be informed with clear and plain language that their participation is voluntary and personal data concerning them are collected,

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used, consulted or otherwise processed and to what extent the personal data will be processed. Persons will be made aware of risks, rules, safeguards and rights in relation to the use of personal data and how to exercise their rights in relation to such processing. A specific protection will be used for minors with regard to their personal data, as they may be less aware of the risks, consequences and safeguards concerned and their rights in relation to the processing of personal data, according to indications provided by Save the Children Italy. The main procedures for transparency mechanisms are detailed in Section 3.3 and 3.4, but can be summarized also in the following steps:

- Provide information to participants about the research purposes, the use of the data, the level of anonymity and eventual risks associated with research and how these will be prevented before the starting of the research activities
- Get informed consent before the start of the research activities. When written informed consent is not possible, researchers could obtain oral consent, in accordance with national laws
- Invite participants to ask questions about the procedures at any moment of the activities
- Inform participants that they can ask to delete their statements and to stop their participation at any moment.

3.3.2 Privacy/Anonymity

Privacy is a fundamental human right recognized by the article 12 of the UN Declaration of Human Rights. It is essential to autonomy and the protection of human dignity. At the same time, in the EU legislation the right to private life and associated freedoms are considered fundamental human rights. The LINKS project will adhere to the standards contained in the GDPR (see also Section 3.2).

On a general ethical level, LINKS will respect the right to private life of any individual, implying first and foremost that confidentiality and anonymity of the persons in relation with research data will be ensured. Accordingly, during research activities any sensitive information or statement will be collected only if strictly necessary for the finalities of the research. If sensitive information will be required, interviewee(s) will be informed before and a specific informed consent will be provided. At every moment, participants can refuse to provide this information, also if they have signed informed consent for this. Never pressures will be made to obtain information. Strict procedures will be taken to guarantee the protection of data, avoiding making the information traceable to the identity of interviewee(s) (see next sections). If anonymity is not always necessary/possible, the decisions about this will be negotiated with every person involved. The need to apply anonymisation or pseudonymisation should be defined before research takes place in order to obtain a good informed consent. Guidelines for anonymisation/pseudonymisation will be provided by UNIFI and EAB before that research takes place.

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Anonymisation/Pseudonymisation

There are a number of steps which can be taken to minimize the likely hood and impacts of data leaks. In cases of highly sensitive data that have to be collected and shared, anonymisation becomes an imperative in research. Anonymisation can be applied also when participants do not want their personal data are shared with others. This is a form of confidentiality that requires the deleting of all the identifying details provided by interviewee/participant. It involves both direct (e.g. name, place, pictures) and indirect (e.g. workplace) identifiers. This process can also be a risk as data may lose relevance because some information could be lost, or incorrect references being made.

When anonymisation is not an option, pseudonymisation is another procedure for making data more secure. In this case, a pseudonym is used to make data record less identifiable. In particular, pseudonymisation is based on the following procedures:

- Interviewee/participants will be identified as a set of codes, so personal information/identity and statements will never be reported in the same document.
- Researchers will ensure to collect personal information in a first document where a specific code will be assigned to the participants and to report statements on a second paper, were only the identification code will be used. In some countries, the process has to be irreversible, so in this case the first document with identifiers should be destroyed.
- If this procedure is not possible, or sensitive/personal data are needed, specific encryption procedures will be taken, like the use of symbols or abbreviations that only researcher can interpret. The list of participants with their codes will be protected according to the procedures described above and according to national laws.
- Key files (linking pseudonyms to identifiers) should be stored on encrypted storage systems.

3.3.3 Setting research and workshops and preventing risks of physical and psychological effects

During data collection (especially for interviews, focus groups and workshops), researchers have the responsibility to:

- Prevent possible situations of power disparity, selecting carefully the setting for research activities (e.g. avoiding to take interviews/activities in own office, selecting interviewers according to the characteristics of the interviewee, giving interviewee the chance to choose the place for the interview, etc.) and adopting disciplined subjectivity (Erikson, 1973)
- Evaluate, and where possible prevent, any risk coming from the venue in which research will take place
- Create a comfortable place and atmosphere, where participants feel at ease, e.g. if necessary, organizing enjoyable moments
- Never pressure participants

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Venues where research activities will take place, should be accessible for all abilities and ages, consider potential participants with difficulties and disabilities, be suitable for the planned activities, and, if minors are involved, must be a space where children can feel safe and protected. Furthermore, ethical requirements and processes must be appropriate to each LINKS partner's local context in order to guarantee the safe and effective running of the activities.

It is mandatory that researchers avoid activating research in places at imminent risk. However, the LINKS case studies are in risk-exposed areas so associated risks could occur during the activities and this should be evaluated in planning research so that every risk of injury for participants (and researchers) should be prevented. Similarly, research activities should prevent any situation that could produce re-traumatization of participants.

Considering the COVID-19 crisis specific measures will be adopted to respect the local rules of the countries in which research activities will take place such as the suggestions provided by the World Health Organization (WHO), especially if vulnerable people and minors are involved.

Workshops/events, also organized as consultation activities, that involve the presence of adults, children, and young people, have to ensure ethical practice to respect and protect safety, health, and well-being of all participants and staff. Save the Children Italy will provide a Child Safeguarding Check-List (as anticipated in Section 3.1.2) for LINKS workshops that involve minors. Moreover, a risk assessment with procedures for emergencies and safeguarding has to be provided as well as procedures to support any person (both staff and participants) who becomes distressed or unwell have to be planned.

In particular, a named lead person, identified within local partners responsible for workshop organization and with the support of the European Organisation for Security (EOS) which is in charge of the overall organisation of the workshops (WP8), has to be appointed with the following duties:

- To oversee workshop venues
- Undertake a risk assessment
- To plan, and whenever required, record activities
- To manage emergency and safeguarding procedures
- To report and feedback any ethical issue to LINKS WP Leaders and coordinator
- To gain approval of activities from the EAB before they begin

Thus, the leading partner has the responsibility to take all necessary measures to ensure the safety of the participants. The same in case of excursions to places potentially exposed to risks, e.g., of floods, earthquakes and others.

In order to ensure the sustainability of the events/workshops, refreshments should be provided at mealtimes such as other breaks.

To conclude, some of the activities may be developed in schools. Schools will be identified in areas hit by a disaster or emergency or at high risk to experience them in line with the purposes of the

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LINKS project. Schools will be approached either directly or with the support of local education department, offering them the chance to take part, and their involvement will take place according to national laws.

3.3.3.1 Further recommendations working with minors in workshops

If minors are involved, support for the lead staff may include the additional invited adults (e.g., teachers or community support workers). Where needed, it is possible to invite parents and teachers and/or community or charity support workers to workshop sessions as additional support for the children and young people.

Workshop planning must follow agreed aims and objectives of the associated WP, and include a timetable for activities managing for breaks and refreshments, ensuring time for 'warm up' and ending 'cool down' sessions, and provision of opportunities to share and contribute to the development of workshop activities and events.

In particular, warm up session should include a discussion with children about everyone working with respect for each other, and agreements about what is and is not allowed, like recording images of people's faces or anything that might identify them.

Workshops must be planned in ways that are child-led, and thus aim to avoid any imposed and unnecessary. Thus, the activities should be designed to use participatory methods (i.e., methods that are enjoyable, that create activities that are participant-led, allowing participants to be free to talk about their experience without forcing or restrictions) in order to work with minors from a range of urban contexts, ethnicities, gender, ability, social disadvantage. Wherever possible children and young people should/can be involved in the planning and design of activities. The aim is for children to be able to engage in the activities and be fully supported in a stable, safe and positive group space, in ways that facilitate their sharing, expressing and developing ideas, and to contribute to further LINKS project activities. Furthermore, within the workshop team, one person has to be defined to be responsible for child-protection, integrating the risk assessment with child protection issues and ensuring that minors will not be exposed to harmful situations.

LINKS partners and all members of a workshop/event team need to be aware of local child protection regulations and requirements (which includes policy on incidental findings), and local procedures to follow should a child protection issue arise during workshops or events.

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3.3.4 Other procedures

3.3.4.1 Data Transcription

In some cases, data may be transcribed using automated methods, like NVIVO[1], which are encrypted both in transit and stored and only the account owner has access to control over the data. Before selecting a service, researchers have to ensure the system of data protection adopted by the provider and the guarantee of data anonymisation. Alternatively, live transcription may be used. In this second case, specific consent forms should be elaborated, with statements about how the third party organization will protect personal data. Participants will be informed about transcription through the informed consent before the research activity takes place, if this information was lacking in informed consent, they should ask participants to sign a new informed consent before that data is sent to the provider.

3.3.4.2 Handwritten notes

During face to face interviews, participant observation, workshops, focus groups and ethnographic research, researchers may take handwritten notes. Researchers must guarantee the protection of any sensitive data contained in these notes. Accordingly:

- No personal data should be recorded in handwritten notes
- Researchers should anonymize the information, using pseudonyms or abbreviations that don't allow to get back to the identity of the interviewee
- If personal data must be recorded, researchers must never include in the same document more than one personal information item, like name, city, and other sensitive data.
- Notes must be stored and protected by researchers, guaranteeing that only authorized persons can access to them
- Researchers should transform the handwritten notes in digital documents as soon as possible and to avoid maintaining paper trace of them
- In case researchers need to destroy these papers, every necessary precaution must be taken to avoid their reconstruction.

3.3.4.3 Social media

Acknowledging the importance of data protection and privacy of personal information, when collecting secondary data, especially from social media, or dealing with secondary use of previously collected data, researchers should provide all participants with confidentiality and anonymity. Open data and content, such as from Twitter, even when pseudonymised could contain information that leads back to the author or to a specific group. Wherever possible, partners should carefully pseudonymise and secure data in order to protect subjects' privacy and minimise risks to their

[1] https://www.qsrinternational.com/nvivo-qualitative-data-analysis-software/about/nvivo/modules/transcription

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fundamental rights in the event of unauthorised access and usage (for anonymity and pseudonymisation see Section 3.3.2). As detailed in guidelines for EU funded projects, researcher should take in consideration to paraphrase the content, seek informed consent from author, or evaluate another research approach to ensure the rights of the author. Moreover, processing social media data, researchers have to verify if they need to obtain ethical approval for collecting data according to their national rules and consulting their NEA.

From the perspective of dissemination in the project: during (social) media activities, as well as content on other project platforms (i.e. LCC), partners are responsible for all the contents they share. They will be responsible also to check that the content shared by the other participants does not offend anyone on the basis of their diversity, according to the principle of diversity awareness described in Section 3.1. In case one of the participants will use inappropriate/offensive language, actions should be taken to stem the situation and prevent it is happening again, e.g. excluding the participant by further activities/by the platform. Accordingly, before LCC will be activated, WP7, in accordance with EAB, will provide guidelines on how to prevent/manage these situations. Furthermore, data for dissemination via the public media requires informed signed media consent specific to each project for all participants (parental/guardian media consent in case of children). This task will be dealt by WP9.

3.3.4.4 Visual/audio recording

It is essential to ensure safe practice in visual data collection and ensure respect and safety of all participants and project staff. Below, the main guidelines for visual data collection and media use are listed:

- Regarding visual images (video, film or photographs), partners must ensure visual and media consent is obtained before the start of the activities that require this kind of image and data registration
- Adult participants must provide their written informed consent, including reference to media consent for visual images and/or audio recordings
- For any minor (under 18) present in the activities, informed consent must be given by children, young people and parents/guardians/schools
- Recorded images with children must be anonymized in terms of specific location and personal identification, following the Save the Children *'Triangle of Risk'* for all visual image recording, storage and dissemination (see CUIDAR, 2017)
- If partners are using recording supports, they must stop recording any time an interviewee appears to be uncomfortable with the recording or directly asks to stop, and they should delete those parts that an interviewee does not want recorded

Furthermore, according to the 'Triangle of Risk':

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- Never shall all of the three or two identifiers be used together: full name, specific location, image
- Use pseudonyms only if needed in captions
- Only give the regional name, city or if relevant, the area of a city, avoiding making references to the exact locations

In case research activities need to collect images and/or videos of minors (e.g. as part of participatory communication processes), Save the Children Italy will produce a *Visual and social media policy* on minors' visual data collection and social media before these activities take place.

3.3.4.5 Use of deception and covert research

Deception is when researchers voluntarily avoid providing information on the purposes of the research or on their activity to participants/interviewee. This method is strongly discouraged in research because it contradicts with ethical principles of informed consent. However, this practice could be justified in cases where researchers think that providing information could distort/bias the results of the research or when information could produce physical and psychological harms. No specific reasons to adopt deception have been identified in LINKS project at this time so this practice is discouraged. However, this strategy gives researchers the responsibility to identify those situations in which deception could be the best solution. In case this happens, they should provide adequate motivations to support their choice and to discuss this with the local ethical consultants and the EAB to obtain approval.

On the other side, some research practices are based on covert research. In this case informant consent will not be asked. These methods are to be avoided when possible. However, especially during (participant) observation in non-public spaces, researcher could receive information provided without informant written consent. This could occur because e.g. researcher is participating in an informal situation and not in a structured research activity or a statement is provided when the researcher does not have informed written consent. In the first case, information should be used as informal data only if the this is essential to the research. In any case, any reference to informants should be registered and the identity/privacy of informants should never be at risk. In the second case, researchers should ask informants to sign the informed consent wherever it is possible before using the information.

As a general rule, no data will be collected without consent or through deception. If, for whatever reason, that is necessary, partners will seek advice from the applicable NEA and LINKS EAB.

3.3.4.6 In case of unexpected situations

Unexpected situations may occur; thus, researchers may be in doubt wherever or not they are respecting the principle of anonymity. Situations that can be a risk for participants and/or researchers or other people could require alerting authorities without respecting confidentiality.

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These situations should be evaluated individually, discussing the situation (when possible) with the consortium, EAB, EA and the partners own legal office, and following national laws. Accordingly, limits about confidentiality should be listed in the informed consent before research takes place. If this situation was not included, researcher should inform as soon as possible participants of the impossibility to respect confidentiality. At the moment, the only situations in the project that could limit confidentiality are associated with situations of abuse that involve children, whose procedures are discussed in Section 3.1.2 according to *Save the Children Safeguarding Policy*. Other situations could be connected to the participation of other vulnerable groups. Accordingly, activities involving vulnerable groups will be planned to prevent further risks for them. If necessary, NEAs will be consulted in order to verify the conformity of the research to national laws.

3.4 Informed consent

According to the article 4 of the GDPR, "'consent' of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her".

Informed consent depends on how adequately the research, and data collection and use, have been explained to potential participants. According to article 7 of the GDPR, consent should be seen as an ongoing process and as something that is renegotiated verbally at each stage of the research. Special attention will be paid to how free and full informed consent is requested by the project partners and given by the participants. Organizers have to ensure that all people participating to the project will be in the condition to provide their consent. This means, e.g., to simplify texts or to explain it verbally, according to the different needs of participants. The informed consent will be collected in the form of signed informed consent sheets, wherever possible and when national laws require for this. Informed consent could also be provided electronically, thus the access to the research survey/interview/workshop will be possible only after participants give their consent, selecting that they 'agree' to it. A downloadable copy of the informed consent should be provided to all the participants.

Prior to commencing any research activities, information sheets will be distributed to all the participants or orally presented (according what participants prefer), to explain and present the background and purpose of the LINKS project. These sheets give participants the necessary information about what they are participating in, the reason why they have been asked to participate in the research, the topic of the interviews/surveys, focus groups or workshops, how their answers will be employed/analysed, and what their rights are (as well as rights on data management). They will be explained that participation is fully voluntary and no costs and payment for this are requested. Participants will also have the opportunity to ask any questions prior to consenting. Even after consent is provided, during the activities, participants can decline to answer

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any question and/or stop their participation at any time, and also decide to fully withdraw from the project. They can ask that their data are erased at any time until the data that can directly identify them has been erased from the dataset. Information on how the participants' personal data will be collected, managed, analysed, and stored will be also provided before the data collection takes place and any time it is needed. In particular, the EAB will provide information sheet containing the following information in all the languages of the participants (sample will be provided by WP10, as part of D10.1, by Month 5):

- Short description of the activity and of the project for which the informed consent is written
- Brief statement of the purposes of the data collection
- How data will be collected/recorded and stored (e.g. interviews could be transcribed using automated platforms, where they will be stored, etc.)
- The level of data anonymization adopted
- The limits to confidentiality (e.g. their data could be shared if there is a legal need to do so or situations of risk make it necessary)
- Who will access the data within the LINKS project, and potentially beyond the project.
- Potential risks of participating in the research
- The option to stop an interview/participation at any given moment
- Contact details of the principal investigator, of the project and other relevant partners involved in the research
- Contact information of the EA and DPO for the project, and the DPO of the local partner organization

If minors are involved, first of all LINKS partners must obtain, and record, permissions to participate by a suitably authorised authority, according to national laws/procedures. This must be done via a distribution of information about the project and/or consultation events to explain the project to the organisation, school, children, and parents. Then, the consent will be reached and authorised by the holder of parental responsibility over the child (GDPR art. 8). There are two options to do this: written consent has to be collected from parents/care givers (this is the preferred option) or only if parents/care givers are not available (for example, have verbally consented but not returned written consent), from the head of school or other organisation with responsibility for the child or young person. In this second case, LINKS should try to obtain also parental consent at the earliest opportunity, preferably through schools/organizations. This information also has to be prepared in a child-friendly version, that has to be appropriate and accessible across different age groups, abilities, ethnic groups, languages, and locations. Standard consent forms have been developed by Save the Children and will be adapted for the LINKS project. Wherever possible, the child-friendly version will be designed in consultation with children.

In case of workshops, the information sheet will be distributed/provided (when possible) at least 48 hours before the workshop/event itself (preferably provided by e-mail) to allow potential

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participants to consider if they want to take part, and allowing minors (whether involved) to discuss with parents/carers/guardians or the school. Before the workshops (even the morning of the beginning day) researchers must obtain signed written consent by the participants. Each individual participant must have given their assent to take part or interpreters for participants must sign a confidentiality form.

The table below summarizes the LINKS tasks that require the informed consent collection and the procedure implemented for the collection itself. However, other activities could require informed consent, so this procedure should not be limited to the list provided. This table will be implemented as part of D10.1. Moreover, specific procedures and samples for oral informed consent and written informed consent will be detailed in D10.1. In the first case (oral consent), research partners should check if and when their national laws authorise to use oral informed consent, consulting also their NEAs. Moreover, researchers shall document that participants gave their oral consent, e.g. recording it with a digital support (more details about the procedure will be provided in D10.1). In case participants are illiterate, researchers should be assisted by competent authorities (e.g. social workers) who will ensure that participants have given their oral consent and who will sign on the behalf of the participants certifying the legitimacy of the action, and that it was understood and confirmed by the participant. Participants will be always free to ask for a written informed consent, also in those cases in which it could be collected orally. In the second case (written consent), two forms will be provided to partners with the procedures to use them. In particular, form A is to be used when collecting data according to traditional research procedures, like surveys, interviews. The Form B is for workshops and platforms. Consent forms will be translated to the appropriate language beforehand, for the purpose of ensuring full transparency and understanding when participants give their informed consent. The text will be written to be accessible to everyone.

Table 3. Procedures for informed consent

WP/Task	Research participants and sampling methods	Procedure for informed consent
T2.3, T2.4, T2.5	WP2 will do field-work activities, that could require to collect different kind of data using e.g. surveys, interviews, participant observation and participatory action research	Consent provided via Informed Consent Form (ICF) A/Oral informed consent (according to national laws) before the start of the activities
T3.2, T3.3, T3.4	WP3 will do field-work activities, that could require to collect different kind of data using e.g. surveys, interviews, participant observation and participatory action research	Consent provided via ICF A/Oral informed consent (according to national laws) before the start of the activities

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T4.2, T4.3, T4.4	WP4 will do field-work activities, that could require to collect different kind of data using e.g. surveys and interviews	Consent provided via ICF A/Oral informed consent (according to national laws) before the start of the activities
T6.2-T6.6	As part of WP6, five cases are discussed. In each case, first responders, security officials, citizens, and other relevant stakeholders involved with disaster resilience and community technologies are involved.	Consent provided via ICF A/Oral informed consent (according to national laws) before the start of the activities
T6.2, T6.3, T8.2	LINKS project will organize workshops and events in different locations (both virtually and face to face).	At the start of each LINKS event, consent is provided via ICF B
T6.2-T6.4, T8.2, T8.3	As workshops are held in four countries, significantly diverse group will be involved to make sure the LINKS Framework is suitable for all different groups of stakeholders (e.g. citizens, practitioners and researchers)	At the start of each LINKS application and evaluation activity, consent is provided via ICF B
WP7	According to LCC, only the required personal data will be collected and securely stored. Each registered member can withdraw at any time from the registration whereby all personal data will be deleted irrevocably. Processing of personal data will be in full compliance with the GDPR, ensuring a high level of protection for collection, storage and processing of this data	For the first purpose, a web-based version of Form A is used. For the second purpose, no anonymity/confidentiality is required as the LCC aims to be a public discussion forum. Participants will be reminded before registering that the forum is public. Potentially non-public areas will be in line with an access and rights concept that guarantee secure and protected data handling

3.5 Data Management

The processing, use, and storage of research data in LINKS must comply with national and EU national privacy and data protection laws, as well as the guidelines outlined in the LINKS Data Management Plan (DaMP) which will be submitted alongside D10.1 GEN XX in Month 5. According to the article 4 of the Regulation (EU) 2016/679 (General Data Protection Regulation, GPDR) use of personal data is included within the wider term "processing" which means "*any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use...*".

Special attention will be paid to the requirements for protection of data as laid down in the EU GDPR directive in the ways that the project will collect, processes and store data. In particular, the LINKS partners will apply the following principles relating to processing of personal data:

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- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality
- Accountability

Personal data will be processed in a manner that ensures appropriate security and confidentiality and stored to prevent abuse, misuse or unlawful access or transfer. In order to ensure an appropriate level of security for data, aggregation, pseudonymisation and anonymization will be implemented during data processing (see Section 3.3). Data must be handled confidentially and stored on secure computer networks with suitable access controls. After data is collected, it should be coded at the local level, electronically encrypted, and securely shared with partners for research purposes in an anonymised/pseudonymised format. Who and how data will be shared must be described in the participant ICF and or accompanying information documentation. A new International standard for data storage security ensures that any valuable information stays in safe hands. *"ISO/IEC 27040: 2015 Information technology - Security techniques - Storage security"* (ISO/IEC, 2015) provides a detailed technical guidance on how to effectively manage all aspects of data storage security, from the planning and design to the implementation and documentation.

This strategy adheres to the FAIR Data Principles promoted by EC for H2020 projects. The principles are finalized to support researchers to make their research data FAIR. About data management, the document *"EU Ethic and data protection (2018)"* (EU, 2018) specifies that it is possible to keep the personal data collected only as long as it is necessary for the purposes for which they were collected, or in accordance with the established auditing, archiving or retention provisions for the project. Importantly, these must be explained to all research participants in accordance with informed consent procedures (Section 3.4). As previously stated, it is important that the ways in which the participants data will be managed (i.e. collected, used, stored, shared) be clearly described in the informed consent documents.

Table 4, provides an example of data storage and sharing procedures which may be used by Stichting VU (VU) for research data (formal procedures will be detailed in the DaMP). Data collected during the project may be pseudonymised and stored on the local secure network drive at VU. Partners in the project will have access to the pseudonymised data (also raw data if needed, but only if explicitly explained in the informed consent documents) for specific research purposes. This data can be accessed through end-to-end encryption services hosted by the VU. The raw and pseudonymised data will stay archived on the VU secure network for 10 years. Metadata about and links to relevant

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data, as well anonymised data (and data which consent was given to share) can be hosted and archived on open data repositories at VU (PURE)[2] and external Zenodo.[3]

Table 4. VU storage and sharing of data (example)

Partner	Raw/pseudonymised data locally stored by	Pseudonymised data sharing	Raw/pseudonymised data archived (>10 years)	Open anonymised data and metadata archived (>10 years) by
VU	VU internal secure networks: GDrive	End to end encryption services: SURFfilesender, ResearchDrive	VU internal secure networks: GDrive	VU (PURE), Zenodo

In general, if research data are subject to an established retention period, or as soon as they are no longer needed, they should be securely deleted in their entirety, guaranteeing they cannot be recovered. Data retained for auditing processes should be stored securely and further processed for those purposes only.

Partners must submit their organizational procedures for data storage and transfer by Month 5. Those procedures are subject to ethical review by the EAB before research can commence. Consortium partners collecting research data must also identify a DPO in their organizations who can be contacted by participants in case of questions or if they wish to have their data deleted (these contacts can be found in the DaMP Month 5). Participants must also be given the contact information of the VU DPO responsible for the overall for data management advisory in the project:

Barend Bon:

Tel: +31 20 59 88633

Email: functionarisgegevensbescherming@vu.nl

Further details on how data will be managed and archived will be provided by partners in Month 5 as part of the DaMP. Some general considerations for data management in LINKS are outlined in Table 5 below.

[2] https://research.vu.nl
[3] www.zenodo.org

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Table 5. Key considerations concerning data in planning research

Key considerations	Actions to follow
How will data be used, stored, and with whom will data be exchanged	Providing clear information for informed consent (Section 3.4)
How and which data to make open for public exploitation and re-use in order to ensure the widest diffusion and access of project results by different stakeholders	Ensure privacy/anonymity of data (Section 3.3.2)
How to preserve protection and accessibility to collected research data in a medium long-term perspective	Define local (organizational) data management procedures (Section 3.5)

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4. ETHICS ASSESSMENT

LINKS applies an ethics-by-design approach to guarantee that ethical requirements, socio-technical and cultural differences are considered in all phases, processes, and activities of the project. For this reason, the consortium has a work plan that is rigorously sensitive to these issues by determining its capabilities and objectives (self-assessment), which lays the foundations for an Ethics Advisory intervention (external and objective), with the mandate to follow and address all the ethical issues during the project.

4.1 Ethics self-assessment

The ethical problems foreseen in the planned project activities (see GA) reflect those highlighted in the self-assessment process required by the HORIZON 2020 Programme, as reported in the Proposal Submission Forms (section "4 - Ethics"). The consortium is able to autonomously guarantee a general level of compliance with the ethical issues that may arise from the interrelation behaviours between partners or general actions towards the outside thanks to the experience of partners who have previously worked in EU research projects, as well as in national and regional activities, in which the ethics was actively considered. This section defines the LINKS ethics self-assessment procedures, which may undergo further external assessment processes in cases of critical or unexpected situations.

This strategy adopts a clear and transparent mechanism for the Ethics Self-Assessment. This mechanism is conceived on two levels of assessments:

- General level on the consortium's ethical awareness (involves all partner organizations)
- Detailed level on the partners research activities (involves partner organizations responsible for research tasks).

General ethical awareness evaluation

This level of assessment uses an annual reporting process which includes a table-based assessment to analyse the ethical awareness of partner (organizations) in relationships with consortium partners and the outside world, as well as the ability to manage ordinary/extraordinary activities in the framework of the project from the ethical point of view.

The research topics, as in Section 2, will be addressed here only in general terms. This tool will assist partners in thinking about their own ethics-related role and actions in the project (Figure 1). The template to use for this self-assessment will be provided to the partners before the self-assessment takes place. The EAB will create the template, establishing with partners also the delivery deadlines throughout the project.

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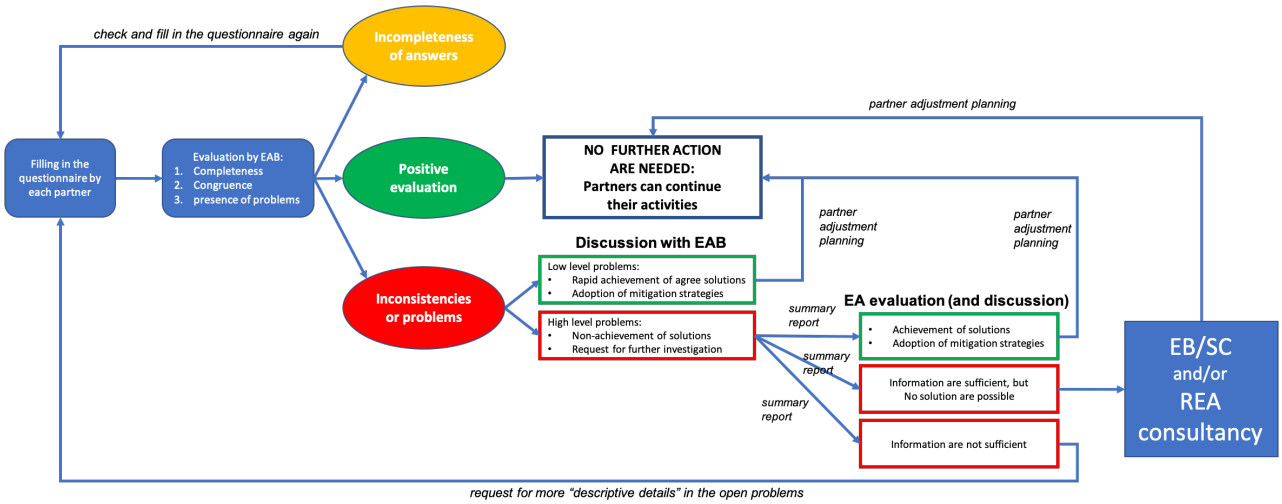
Figure 1 shows the flow chart of the ethics self-assessment related to partners' awareness in approaching the project from an organizational point of view. The process refers to a critical observation of the partners attitude to ethics. The self-evaluation is repeated each year (Months 12, 24, 36). The procedure is designed to be internal, and external only when there are more complex situations that cannot be resolved internally.

Figure 1: Flow chart of the ethics self-assessment procedure



The assessment process will help partners to understand the state of their actions in ethics and to strengthen their ethical considerations for future activities. Ongoing assessments and re-evaluations will help partners to commit to sustaining ongoing and continuous ethics improvement. The ethics assessment tool is also a way to measure the overall ethical considerations in the project and how to improve it.

Operationally, this tool consists of a certain number of basic statements that need to be evaluated in the table through pre-established answers (choosing only one and ticking among Almost Never, Occasionally, Usually, Always, N/A) with the possibility of some free integration and comments. Some sentences can be indirectly linked and structured in such a way that some answers are incompatible with each other, highlighting a problem (or simply in the compilation or, more seriously, of a conceptual type). Only one analysis is required for each partner which includes the shared considerations of the whole working group (it is not a personal reflection). This tool does not have a scoring mechanism, as the consortium do not believe that ethical behaviours can or should be quantified. Its completion has to proceed with the following mechanism:

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- Check only one answer for each of the statements. The statements are grouped into areas of impact for ease in reflection
- Once all the statements have been answered, take time, review the responses, and make note of statements answered with "usually," "occasionally", and, "almost never"
- Identify which of the answers may raise concerns; reflect and decide which you need to address
- Using the development plan (to be provided), identify appropriate next actions to develop and refine the ethical behaviours

Before every submission, the congruence of the documentation must be checked by the EAB, which can also always be consulted for ethics questions of a general nature. Possible inconsistencies identified by EAB in the self-assessment provided by partners, or suspected violations, will be subjected to further internal assessment. If unresolved, the controversy will be brought to the attention of the EA to obtain an independent evaluation and opinion on how to proceed. To this scope, EAB will provide to EA a detailed document with the results of the investigation. At this point EA may consider that the information is insufficient to proceed and request more detailed information inducing the reiteration of the evaluation process under specific indications. However, if the information is sufficient EA can try to search for solutions to the problems or otherwise can pass all collected material at the higher grading levels which includes the Executive Board (EB) and Steering Committee (SC) and/or the Research Executive Agency (REA).

Partner research activity evaluation

The application of a more systematic evaluation procedure is also foreseen during the project. The reports will be produced for each research task, filling in a short form with few but targeted questions. A sample has been structured using as reference the BuildERS EU sister-project (https://buildersproject.eu/). The forms will be distributed by the EAB before the end of Month 6, when some research activities in the project are planned to begin. It is expected that WPLs/TLs complete it before research activities take place (so it depends on how research partners will schedule research).

The form will be composed of open answers. An information sheet and informed consent should be attached to the tool for the review process. Its evaluation will be responsibility of the EAB. As with the first assessment mechanism, this assessment will not be done to judge the work of research partners but to offer a tool to improve the adherence of the research activities to this strategy.

Accordingly, the tool will be structured in a table for collecting the following information:

- List of the partners involved in the research
- Period of the research
- Activities that will be developed

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- Details on ethical topics and issue

Ethic information will be assessed across a number of macro categories relating to their relevance in the project activities and ethics strategy. Seven potential categories have been identified based on the BuildERS ethics framework mentioned above. These are grouped in:

1. Justice/participation
2. Responsibility/accountability
3. Freedom of choice/autonomy
4. Trust/transparency
5. Non maleficence/beneficence
6. Privacy
7. Data collection and processing

Since the data management is a crucial point for the LINKS project research, the following elements should be specifically considered in relation to point 7 (and Section 3.5) and then reported in table with annotations:

- Who is responsible for the research (principal investigator, e.g. people collecting surveys, etc.)?
- Who will be involved in the research as participant (which social groups, number of people, place, how participants have been selected and if the diversity principle has been respected, if not why etc.)?
- Level of information required (are there sensitive data required? Why? Is this necessary? With which purposes and for which use?)?
- Which kind of information will be provided to participants? Are these information enough?
- How data will be processed and stored?
- How will the process of anonymisation/pseudonymisation take place?
- What could be the potential unexpected situations that I can meet? Have I envisioned prevention/mitigation actions?

It is not necessary to fill in all fields if they are out of context in some specific cases (just briefly justify the lack of insertion). However, in addressing the various ethical issues, it is mandatory to highlight the potential ethical problem that requires mitigation or prevention measures.

4.2 Ethics Advisory

4.2.1 Ethics advisory components and roles

LINKS involves a large range of actors, including the LINKS community, that participate in many of the activities undertaken throughout the course of the project's lifetime (see also Section 6). Accordingly, a LINKS ethics advisory system has been established to deepen in a systematic way the

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issues raised from the preliminary ethics self-assessment. This system displays a range of expertise and the breadth of experience necessary to provide a competent and rigorous overview of ethics in research. It is multidisciplinary and its composition will respect gender equality.

The following entities participate in the advisory:

- Ethics Advisor
- Ethics Advisory Board
- National Ethics Authorities
- Data Protection Officers

Ethics Advisor (EA): an independent Ethics consultant who is appointed to monitor the ethics issues involved in this project, and how they are handled. The EA must be consulted on aspects involving human participants, including their recruitment, their consent to the project, and their involvement in the research (e.g. processing of their personal data), ensuring quality control during the various working phases. The EA has also the responsibility to provide inputs into this Strategy (by Month 4), and an independent report on the projects handling of ethical issues in the project must be submitted to by the EA to the PC and REA in Month 11 (D10.5). Any contact with the Advisor goes through the PC at VU adopting transparent mechanisms.

Ethics Advisory Board (EAB): The EAB is established in order to support the project governance and is composed of (minimum) 4 members among the partners of the project. These include VU, UNIFI, Københavns Professionshojskole (UCC) and the Safety Innovation Center E.V. (SIC) as partners responsible for ethics and SIS and reports:

- VU takes part as coordinator and lead data projection advisor with a general experience in areas relating to ethics and diversity aspects, organizational science, and disaster studies
- UNIFI participates as the lead ethics partner in LINKS and the lead of the Ethics Strategy with an experience in ethics issues related to DRVP
- UCC adheres as a newly founded ethics committee, with specific focus on ethics related to social science research and emergency and disaster studies, also at practitioner levels
- SIC is involved as the technical partner in LINKS with past experience in the technical ethical considerations in EU projects, and also owing to its close proximity to some of the other partners (Deutsche Hochschule der Polizei and Federation of European Union Fire Officer Associations) which might also be consulted in other relevant areas needing ethical considerations (e.g. law enforcement, security, and practitioner perspectives)

Physical members should be selected on the basis of the experience in ethics and societal impact issues. The EAB coordinates the actions between its members and project partners and offers oversight of ethical and societal impact issues that may arise in the project. Researchers can contact EAB about any concern or dilemma related to research activities. Ethics is of course a responsibility

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of every partner (as expressed in the self-assessment), however EAB can guide and support researchers ensuring a consistent approach to ethics issues through the life of the project, as well as helping to overcome ethical problems.

National Ethics Authorities (NEAs): NEAs will act as an integral part of the research activities, and are independent and consortium-external professional members experienced in understanding and identifying ethical and legal issues. They are members of competent bodies based in the countries where research is planned to take place (official national committees, competent authorities, institutional review boards - identifies in D10.2). Their primary aim is to ensure that LINKS research plan adheres to the ethical guidelines to which the project refers in relation to the rules, laws and ethical requirements of the country where they are called to oversee the project. In a similar vein to the EA, NEAs are experts who can offer their advice on how the LINKS project is (and should be), in-line with all ethical requirements and with current national and supranational legislation.

Data Protection Officers (DPOs): DPOs are expert advisors, as noted in the new European regulation on the protection of personal data (GDPR n. 2016/679, art. 37), who are responsible for assisting the project with issues pertaining to data protection. The DPOs must be established by each partner organization of the consortium conducting research with humans and storing data, and they can be contacted by researchers when needed (identified in D10.3). PDOs have a legal background with an in-depth knowledge of privacy legislation and practices, as well as of the rules and administrative procedures. They have also IT, risk management and process analysis skills and perform their duties in full autonomy and independence, and in the absence of conflicts of interest. In carrying out their duties, the DPOs duly consider the risks inherent in the processing, taking into account the nature, scope, context and purpose of the project.

Some tasks which the DPOs will assist with in LINKS include:

- Inform and advise the data processing responsible partner regarding the obligations deriving from the EU Privacy Regulation 2016/679 (GDPR), as well as other EU provisions or of the country relating to data protection
- Monitor compliance with the EU Privacy Regulation 2016/679 (GDPR), other provisions of the Union or the belonging country relating to data protection as well as project policies, during the project's activities
- Provide, if requested, an opinion on the impact assessment on data protection and monitor its performance pursuant to Article 35 of GDPR
- Cooperate directly with the national partner (even if, for transparency, the DPO contact details are available to all participants involved in the research and they are part of content of the consent form) and act as a contact point for the partner for issues related to the ordinary activity, like the data processing, or extraordinary cases, like the data breach or suspicion thereof

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- Support the project to identify approved mechanisms to transfer personal data to and from third countries
- Cooperate with the supervisory authorities of their own nation
- Act as a contact point, not only for the supervisory authority but also for the persons interested in data processing, regarding any problem related to their data or the exercise of their rights
- Act as a point of contact for research data subjects relating to the management or mismanagement of research data.
- Consult the supervisory authority also on its own initiative

The obligations of the responsible partner towards the DPO are:

- Being clear and upfront with DPO about how data are collected, used and managed
- Allow access to data and processing operations
- Ensure a free possibility of contact between DPOs and participants in case the latter need to contact the DPO
- Support the DPO in carrying out their duties

This configuration involves the establishment of the prepared entities both internal (EAB) and external (EA, NEA and DPO) to the project consortium to oversee the ethical and legal issues involved in the project whenever an ethical consideration arises The LINKS's dedicated WP on ethical management intends to involve the EAB on a regular basis and the EA, NEA and DPO where necessary, and act as a logical conduit through which recommendations and feedback can be communicated.

4.2.2 EA and NEA tasks: general overview and interrelations

The EA offers advice to LINKS partners on the practices to ensure that the consortium as a whole is aware of the ethical implications of the proposed research and will respect the ethical rules and standards of HORIZON 2020, and those in the Charter of Fundamental Rights of the EU, in accordance with European legislation, and international conventions and declarations. Furthermore, LINKS plans to use the vast experience of the EA in the final decisions on project undertakings including the opportunity to make data available for future research, even going beyond the designed strategies and in a more comprehensive way to expand the possibility of reaching other types of possible users.

The NEA member observe that the partners, who produce actions possibly impacting people through their research (e.g., working in the case study), the dissemination activities or other activities, are aware of ethical implications of the undertaken action (locally or elsewhere in the same country) and respect the ethical rules and standards of the current national or local legislation.

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Those of EA and NEA cannot be considered closed-box operations and for this reason they must, to a certain extent, also take into account each other's activities in order to avoid ethical paradoxes in the formulation of the final framework. Although there is a strong concatenation of the legislative system of European members, legislative inhomogeneities between one country is another risk leading to contradictions if not addressed carefully in an open way. Sometimes the EA and NEA are called to intervene in some very similar tasks. However, in these cases NEAs intervene only in relation the research activities in the study location (local or national level), the EA for all the other issues that could emerge during the project (broader level).

4.2.3 Focal points on research activity

According to the LINKS management terms, the ethics advisory entities have also to ensure that the highest standards of research integrity are maintained in carrying out each phase of the project, following primarily the European Code of Conduct for Research Integrity (e.g. avoiding fabrication, falsification, plagiarism or other research misconduct) and other official standards recognized at national and international level. Moreover, also the commitment to eliminating inequalities and promoting gender equality, as discussed in this strategy, has to be assessed point by point in the progression of activities on the base of the European Policy of equal opportunities. For all research activities which may imply ethical or legal issues, an oversight is sought by the defined competent body.

In particular, the research activities in LINKS require the involvement of human participants and are planned at different times and in different locations throughout the project. The ethical research roadmap (Table 1) provides an overview of those activities which must receive approvals by NEAs for the research with humans, as specified in the GA under deliverable D10.2: H – Requirement No. 2. Reports to be approved by the NEAs will include:

- A short description of the project, research objectives, the societal and scientific relevance of the research, and the research design
- Ethics roadmap and timeline
- Information for participants
- Consent forms
- Research materials (where possible)
- Anonymization/ pseudonymization procedure
- Data management plan
- This Ethics and SIS

Research with human subjects cannot commence before approval has been granted. Copies of approvals by ethics authorities will be kept on file, and confirmation sent to the REA. Moreover, during the project LINKS members can make use of NEA consultancy if activities change or are

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deemed necessary for unforeseen problems and contingent plans must be applied to the initial action strategies.

Regarding the sensitive issue of the informed consent: the practical procedures, roles and responsibilities, IT-platforms of choice, and access controls related to obtaining and registering consent is designed in the project should be verified by DPOs and the NEAs to ensure, according to their role, that the data subjects have been informed about the rights and consent has been registered as planned.

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5. RESPONSIBILITIES AND RIGHTS OF CONSORTIUM PARTNERS

5.1 Recruitment

In case new staff members are recruited to take part in LINKS activities, the selection procedures will take place according to the national regulations concerning workers recruitment of the country where the new personnel will be hired.

The recruitment will also be in accordance with the ethical standards of the project and will be carried out with transparency and neutrality, without any discrimination on the basis of gender, sexual orientation, age, religion or belief, ethnic or national origin, language, disability, political opinion, physical appearance, economic or social origin or condition.

In particular, gender equality will be respected in all the phases of the LINKS project: gender balance and equal opportunity will be ensured in the management structures and leading roles, in order to address the gaps in the participation of women in the HORIZON 2020 projects, in line with the six key priorities listed by the European Research Area (ERA) in the Communication set out in the July 2012 and with the three core documents of HORIZON 2020 (The HORIZON 2020 Regulation, The Rules for participation and The Specific Programme implementing HORIZON 2020).

The newly recruited staff will be expected to be familiar with ethical behaviour in research and at work in general, and with the LINKS ethics protocol in particular, will be made aware of the contents of the present document, and will be able to make inquiries in case doubts or issues concerning ethical behaviours arise.

The research activities of the project will only be carried out by LINKS partners. All the people taking part in the research will be familiar with all the ethical requirements associated with the activities of the project.

5.2 Research integrity

All the research activities performed by partners within the LINKS framework will comply with the European Code of Conduct for Research Integrity, as well with the other international, EU and national regulations.

Especially, the researchers will conform to the following principles:

- Reliability in ensuring the quality of research, reflected in the design, the methodology, the analysis and the use of resources
- Honesty in developing, undertaking, reviewing, reporting and communicating research in a transparent, fair, full and unbiased way

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- Respect for colleagues, research participants, society, ecosystems, cultural heritage and the environment
- Accountability for the research from idea to publication, for its management and organisation, for training, supervision and mentoring, and for its wider impacts

Some good research practices are particularly relevant to the activities of the project, concerning research procedures, safeguard, data practices, publication and dissemination. In particular:

- Researchers take into account the state-of-the-art in developing research ideas
- Researchers make proper and conscientious use of research funds
- Researchers publish results and interpretations of research in an open, honest, transparent and accurate manner, and respect confidentiality of data or findings when legitimately required to do so
- Researchers handle research subjects with respect and care, and in accordance with legal and ethical provisions
- Researchers have due regard for the health, safety and welfare of the community, of collaborators and others connected with their research
- Researchers ensure access to data is as open as possible, as closed as necessary, and where appropriate in line with the FAIR Principles (Findable, Accessible, Interoperable and Re-usable) for data management
- All partners in research collaborations take responsibility for the integrity of the research
- All partners in research collaborations are properly informed and consulted about submissions for publication of the research results
- All partners consider negative results to be as valid as positive findings for publication and dissemination
- All authors are fully responsible for the content of a publication, unless otherwise specified
- All authors agree on the sequence of authorship, acknowledging that authorship itself is based on a significant contribution to the design of the research, relevant data collection, or the analysis or interpretation of the results
- All authors acknowledge important work and intellectual contributions of others, including collaborators, assistants, and funders

Moreover, researchers will refrain from research misconduct such as plagiarism, falsification, fabrication, and from other unacceptable practices such as manipulating authorship, re-publishing substantive parts of one's own earlier publications without duly acknowledging or citing the original ('self-plagiarism'), citing selectively to enhance own findings, withholding research results, jeopardise independence in the research process or reporting of results, expanding unnecessarily the bibliography, accusing a researcher of misconduct or other violations in a malicious way, misrepresenting research achievements, exaggerating the importance and practical applicability of finding, hampering the work of other researchers, misusing seniority to encourage violations of

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research integrity, ignoring putative violations of research integrity, supporting journals that undermine the quality control of research ('predatory journals').

5.3 Safety and well-being of workers

LINKS Project does not include activities in conflict zones, remote areas, constructions sites or interaction with industrial machinery.

The possible hazards envisaged are:

- Ergonomic: repetitive movements, improper setup of workstation, poor design of equipment, workstation design, (postural) or workflow, manual handling, repetitive movement etc. Since a large part of the projects' activities will be carried out in office, the participants are subject to the risks affecting a video-terminal user. While the responsibility of this kind of hazard is of each participant's employer, the EAB of LINKS will make sure that all the staff are aware of the risks and the rights of the staff, in accordance to the European and to the respective national and local regulations
- Physical: slippery floors, objects in walkways, unsafe or misused machinery, excessive noise, poor lighting, fire, noise, etc. While this type of risk is related to the workplace and therefore is responsibility of the participant's employer, the EAB of LINKS will make sure that all staff are aware of the risks and the rights of the staff, in accordance to the European and to the respective national and local regulations
- Psychological: workload, dealing with the public, harassment, discrimination, stress, violence, etc. As far as the exposure to psychological risk concerning the activities related to the LINKS project (i.e. interactions with other LINKS participants, execution of interviews and seminars with the general public), the EAB will monitor that the indications reported in this strategy (with special reference to the research integrity section) are adhered to, in order to prevent the insurgence of behaviours that could lead to some of the hazards reported above. It is recognised that researchers returning from the field may feel post-fieldwork stress, should they require any counselling this will be provided to them by their host institution
- Biological: this type of hazard is represented by the current pandemic of COVID-19 and by any similar disease that may spread during the duration of the project. The EAB will ensure that during the execution of physical meetings, interviews, seminars carried out within the LINKS project, all relevant public health regulations and recommendations with regards to preventing the spread of COVID-19 are followed. In particular, the advice provided by the WHO will be followed, such as keeping a hands hygiene, avoiding touching eyes, nose and mouth, staying home and self-isolating even with minor symptoms, maintaining at least 1 metre from others and keeping a sanitary mask whenever this is not possible and in closed environments

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- Chemical: it depends on the type of chemical and its toxic, physical, and chemical properties (refer to the Regulation (EC) No 1272/2008 for a classification of the chemical substances). This hazard is present when a worker is exposed to any chemical preparation in the workplace in any form (solid, liquid or gas). Some are safer than others, but to some workers who are more sensitive to chemicals, even common solutions can cause illness, skin irritation, or breathing problems. Some common chemicals are liquid products, paints, solvents, acids, carbon monoxide, pesticides. Exposure to such agents is not seen as largely probable, considering the activities of the project, but some actions are to be taken in the Netherlands case study which is related to the industrial hazards and accidents.
- Natural hazards: they can affect participants to the project in their workplace or during outdoor activities. The most common natural hazards against which the project staff should be prepared are extreme heat, extreme cold, floods, earthquakes, landslides, storms, snow/ice. Depending on the site, the participants must be aware of what could be the more probable natural hazards affecting that place in that particular time of the year

The EAB will help to ensure that appropriate health and safety procedures conforming to relevant local/national guidelines/legislation are followed for staff involved in this project. For their part, researchers will avoid, wherever possible, actions, which may have harmful consequences for them, their colleagues or their discipline.

5.4 Insurance

All the staff members taking part in the project will be required to undertake the appropriate insurance (travel insurance, medical insurance) during fieldworks, meetings and in general any travel done to fulfil LINKS activities.

No travels to regions currently hit by conflicts or with a real kidnapping risk are envisaged.

5.5 Conflicts resolution

Conflict resolution is addressed in the Project Management Manual and more generally in the GA and Consortium Agreement (CA). Nevertheless, it is worth elaborating on some elements here, in light of the topic of this strategy. Partners will have close relations among each other in LINKS, since many Tasks of each WP need the contribution of several or all the partners. Good project management is possible only if all partners actively participate to the fulfilment of the working plan; starting from this principle, each Task and each WP has been assigned to a partner (leader) that will be the principal interface for the project's duration. The leader is accountable for the day-by-day management of the task/WP's activities, will have the executive responsibility and will provide that the task/WP coordination and control accord to the respect of deadlines contained in the project

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timetable. Therefore, the leaders will have the duty to assure that the communication and information flow among the partners will be consistent and clear.

A management by exception style will be followed, to help the LINKS Project Coordinator (PC) to understand where attention is to most needed. Each leader will be given tolerances regarding aspects of the project, and each member of the Project Team will fix problems and issues if they are inside his/her tolerances. In case things deviate from the norm, he/she will raise an alarm. If an alarm/issue arises within the team, the task/WP coordinator should inform the PC as soon as possible about the disagreement through e-mail. All documents retaining relevant information shall be attached to the e-mail. Any possible problem will be discussed on-line through TEAMS a call (or in person when necessary/possible), in order to find shared solutions. The PC will examine all the information received via e-mail and will organize a meeting within 48 hours from the disagreement notification. To reconcile the parties a consensual leadership model will be used. The principle adopted for decision-making is normally the unanimity. In case of contrast, the last decision will be assumed on the principle of relative majority, while in the event of a tie, PC's vote will weigh twice. The PC will write a report regarding the call/meeting topics and decisions and will forward to all the attendees within 24 hours from the meeting. If a settlement cannot be found an exception will be raised to the EB, which may result in consulting the REA and SC. In case the PC is party to the conflict, the SC will nominate a third party to manage conflict resolutions.

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6. SOCIETAL IMPACT STRATEGY (SIS)

The main purpose of the LINKS project is to reduce the risk of negative impacts to stakeholders coming from disasters and to enhance positive impacts that could derive from the interactions between different stakeholders and by their inclusion in the disaster risk management and reduction processes. Improved social security is of specific impact importance for LINKS, concerning life, health and environment. In particular, the project will focus on the threats associated with floods, earthquakes, droughts, tsunamis, terror attacks and technological/industrial accidents. Methods to improve societal resilience and to reduce risks and vulnerability will be carried out throughout the project with specific reference to management and risk reduction, as articulated also in this strategy.

Accordingly, a SIS is necessary to support the results of the research and the ethics strategy. The SIS and Ethics strategy are strictly interdependent and are not separate processes. Thus, the research assessment described in both the sections will take place as a conjoined process. The idea to give a specific space to the SIS into the Ethics Strategy is due to the need to go in depth into this section, giving a specific relevance to the societal impact dimension of the process.

The main purposes of the SIS are to:

- Promote the equality and just distribution of the project impacts
- Promote diversity in the project inputs and outputs
- Prevent the risks of negative societal impacts coming from the project/do-no-harm

The process of framework development (WP5) with increments of assessments and monitoring (WP2-3-4) constitutes important opportunities to prove the usefulness and the efficiency of the project in terms of societal impact. The development and analysis of specific case studies (WP6), in particular, represents a methodological approach to measuring impacts, as also discussed in depth in the next section.

Moreover, international, national and local impacts will be monitored (as provided below) and different benefits that can derive to each stakeholder involved in the project will be considered. To identify these, LINKS partners will work with participants to define what is a benefit and conversely what is a negative impact for participants, and will promote a participatory approach throughout project (see in particular WP5 and 6). Finally, because impacts might not be visible to everyone, specific communication channels and strategies will be used to provide information on the potential benefits deriving to the different stakeholders (see WP9). Accordingly, a Societal impact roadmap of the project have been structured and presented in this strategy (see Section 6.1).

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6.1 How LINKS will identify societal impact of the project

According to this strategy, the word "impact" refers to the effects that research, projects, policy, actions and inaction can have on a place or group of stakeholders. In these terms, impacts can be both negative and positive, and can both come from the approaches adopted in the project and the expected consequences produces on the resilience of a community or group of stakeholders. Positive and negative impacts are also to be understood as consequences of the different perspectives and interpretations by each group of stakeholders.

LINKS is organized to provide several opportunities to both demonstrate and assess how the societal impacts will be met throughout the project. In particular, in the activities taking place in relation to local cases, workshops, and in the other dissemination activities, there will provide opportunities to discuss with research participants and stakeholders on the extent they see the project addressing their needs in terms of societal impacts.

Thus, in order to identify and monitor the societal impacts of the project, specific relevant actions have been identified and listed at follow:

- *Promoting plurality* with the direct involvement and active collaboration between academic and non-academic stakeholders in a participatory way with the aim to promote knowledge sharing and strengthen local communities
- Working with participants to ensure broad *societal relevance* of the research, considering the specific needs of all the participants
- Ensuring the *usefulness and consumability* of the products of the research among diverse stakeholders (in order to guarantee consumability see also accessibility to the results)
- Promoting *knowledge transfer* through multi-stakeholders interaction and results diffusion
- Adopting a cross-border, cross-language, cross-cultural, cross-disciplinary approach (*cross-knowledge*)
- *Assessing case studies* adopting a multi-stakeholder participatory approach to evaluate/assess the LINKS framework
- Promoting the *visibility* of the project, of its purposes and outputs, with diverse audiences
- Ensuring open data and *accessibility* to the results, in terms of physical, cultural, intellectual, and linguistic accessibility

Accordingly, the methodological and analytical framework that will be developed with the LINKS project adopts a state-of-the-art approach to addressing issues related to the management and risk reduction of natural and industrial hazards, and terror incidents, specifically in the context of new and emerging technologies and forms of communication related to SMCS. The project will address such threats promoting the inclusion of different stakeholders, like practitioners, citizens and researchers, representing a wide array of interests that all need to be included and aligned if future risks are to be faced proactively. Accordingly, interaction with diverse participants is a necessary

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baseline requirement for the SIS and a first way to evaluate the societal impact and societal relevance of the results and to guarantee plurality along the project.

Moreover, LINKS will assess impacts on the different stakeholders, in particular during the case studies activities as planned in WP5 and 6, and with the support of WP2-3-4. Involvement of stakeholders will be guaranteed not only in case studies activities but also during workshops (WP8). All these activities will work also in terms of knowledge-transfer and cross-knowledge. In order to evaluate the long-term societal impact of the project, WP3, WP6 and LCC (in particular but not limited to them) will evaluate the adaptability/usefulness of the procedures and solutions promoted by the project in the different local contexts and which products could be effectively incorporated in local practices and policies.

To conclude, the diverse set of dissemination activities (project website, videos, multimedia presentations and leaflets, occasional press releases, social media networks and e-newsletters, articles, scientific papers, workshops and conferences, as part of WP8 and 9) will ensure that the findings, insights and good-practice results coming from the research activities developed in LINKS will be shared with all the target audiences, at every level and domain in EU and beyond, that might benefit from them. On this side, LINKS project will work to promote high levels of accessibility, considering potential limits coming from linguistic, cultural and intellectual diversity.

As provided for the ethics strategy, a societal impact roadmap is introduced here with a specific reference to the task level. This roadmap is the result of preliminary considerations on the potential indicators (also cited above) that will be used throughout the project in order to guarantee the achievement of societal impacts and to 'measure' them. Thus, this is a living document that will be implemented along with the development of the project whenever it is required.

Table 6. SIS Roadmap

Societal impact indicators used	WP	Deliverables	Brief description of the activities	Months
-Direct involvement and active collaboration between academic and non-academic stakeholders Societal relevance of the project, usefulness and consumability of the project	WP2	D2.3, D2.4, D2.5, D2.6	DRPV, DMP and DCT frameworks will be built in collaboration with local practitioners, identifying priorities with their support and testing the usefulness of the developed methodologies	M6-M42
	WP3	D3.3, D3.4, D3.5		
	WP4	D4.2, D4.3, D4.4, D4.5		
	WP5	D5.1, D5.2, D5.3, D5.4, D5.5	LINKS framework will be the result of a participatory process in which all the partners will be involved, giving space	M1-M38

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			especially to practitioners' needs and expectations	
	WP6	D6.1, D6.2, D6.3, D6.4, D6.5, D6.6	Case studies development and assessment is at the basis of the LINKS framework. Assessing activities will be done in the different contexts in order to evaluate the usefulness and potentiality of the framework	M1-M42
	WP7	D7.1, D7.2, D7.5, D7.6, D7.7, D7.8	LCC is thought to be a space of collaboration and interaction among the different partners/stakeholders	M1-M42
	WP8	D8.1, D8.2, D8.3, D8.4, D8.5, D8.6	LCWs will be relevant moments of discussion with partners and stakeholders external to the project. They will give the opportunities to open the debate and test the ideas	M1-M42
Equity, diversity, plurality and sustainability	WP1	D1.1, D1.2, D1.3, D1.4, D1.5, D1.6, D1.7	Responsibility of WP1 is of avoiding/resolving conflicts, ensuring the respect of ethics and SIS and the achievement of its principles	M1-M42
	WP10	D10.1, D10.2, D10.3, D10.4, D10.5	WP10 will provide some requirements to ensure the monitoring of the ethics and societal impact process	M1-M11
	WP6	D6.1, D6.2, D6.3, D6.4, D6.5, D6.6	The case studies, the LCC and the LCWs will be developed according to the principles at the basis of the ethics and SIS	M1-M42
	WP7	D7.1, D7.2, D7.3, D7.4, D7.5, D7.6, D7.7, D7.8		
	WP8	D8.1, D8.2, D8.3, D8.4, D8.5, D8.6		

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Knowledge transfer	WP7	D7.1, D7.2, D7.5, D7.6, D7.7, D7.8	One of the main tasks of the LCC and LCWs is to promote collaboration and knowledge transfer among the participants	M1-M42
	WP8	D8.4, D8.5, D8.6		
	WP9	D9.1, D9.2, D9.3, D9.4, D9.5, D9.6	WP9 is finalized to ensure the diffusion of results and of the best practices.	
Cross-border, cross-language and cross-disciplinary approach	WP2	D2.1, D2.2, D2.3	All the WP2-3-4 but especially the first tasks will work to promote a cross-disciplinary, cross-language and cross-border approach to their knowledge domains	M1-M6
	WP3	D3.1, D3.2		
	WP4	D4.1, D4.2		
	WP5	D5.1, D5.2, D5.3, D5.4, D5.5	The LINKS framework will be built according to the principle of transversality	M1-M38
	WP6	D6.1, D6.2, D6.3, D6.4, D6.5, D6.6	This approach is at the basis of WP6 that will create a space where local partners will interact and work to create the LINKS Framework assessment plan	M1-M42
Visibility of the project, open data and (physical, cultural, intellectual and linguistic) accessibility of the results	WP9	D9.1, D9.2, D9.3, D9.4, D9.5, D9.6	The visibility of the project and the accessibility of results will be ensured by the dissemination process	M1-M42

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6.2 Societal impact self-assessment and reports

Along with the interim and final project reports (D1.2, D1.4), LINKS will also produce two specific Societal Impact assessments as part of the Ethics and Societal Impact reports (D1.6, D1.7) that will be produced at Months 18 and 42. These reports will evaluate and assess how the project has achieved its goals on making the societal impacts that have been laid down in this proposal.

According to the societal impact assessment guide developed by Driver+ EU project (2019), relevant steps to assess projects' societal impact are:

- Identify stakeholder groups/communities
- Collect background information
- Get an overview of legislation and policies
- Identify and predict impacts
- Describe mitigating measures and follow up

All these steps have been planned in the LINKS project, and in particular:

- *Identify stakeholder groups/communities*: this task will be reached in WP2-3-4 and WP6. In particular, D2.1 will provide definition of vulnerable groups, while D3.1 and 4.1 will focus respectively on processes that policy makers set up to govern disasters and technology providers. Following steps will work to provide details about these categories in terms of case studies. Meanwhile, WP6 will work mainly with practitioners to improve knowledge about their experiences, needs and gaps
- *Collect background information*: this work is based on WP6 as part of case assessment. Also WP2-3-4 will collaborate especially producing a scientific knowledge background in D2.1, D2.2, D3.1, D4.1
- *Get an overview of legislation and policies*: This task is mainly based on WP3 that will map existing regulation and policies that guide the use of SMCS in European disaster management and for disaster resilience
- *Identify and predict impacts*: the self-assessment process here proposed aims to satisfy this aspect. Moreover, the participatory process, especially in WP6, WP7, and WP8, that has been activated in LINKS will give space for discussion moments about limits and potentialities of the applied methodologies
- *Describe mitigating measures and follow up*: this is a fundamental step and this will be asked in the self-assessment process (see below). Societal impact reports will work also with the aim to produce follow up on the impact and on the mitigation procedures activated

Following this structure, a system of self-assessment of LINKS societal impact is hereby adopted according to which every Work Package Leader (WPL) will define specific positive and negative outputs that could derive from their activities and be responsible for their evaluation. Feedback will

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be required along the project, as already scheduled for the ethics self-assessment (see Section 4), on the bases of two procedures:

- Annual reporting process: annual reports will be asked to all the partners, based on closed-questions as already figured for ethics assessment
- Ethics self-assessment: a self-assessment of the research will be asked to be delivered to the EAB before research activities will take place, with the aim to identify potential impacts of the activities and evaluate the planned mitigation strategies. A specific form will be provided about the following issues:
  - Kind of activities delivered
  - Social stakeholders involved directly and indirectly and how they were selected
  - Positive and negative outputs identified before the development of the activities
  - Positive and negative outputs expected at the end of the activities
  - Negative outputs avoided and which strategies have been taken in action for this

As for ethics assessment, the final societal impact assessment tools will be submitted to EAB after the board will be established and before research takes place, at latest before the end of Month 6, when it is planned that field-work research should start.

6.3 Stakeholders of the SIS

The purpose of LINKS is to produce results, recommendations, methods and tools that will benefit different stakeholders, like governmental authorities and emergency response organizations, Non-governmental organisations (NGOs) and civil society. In particular the project will work at implementing SMCS related policies and practices in DMPs by improving disaster resilience and reducing exposure to risks.

Specific impacts on diverse sets of stakeholders will be considered by equipping them with better know-how. In particular, LINKS aims to strengthen community involvement in issues surrounding the topics of the project, like disaster preparedness, response and risk reduction. LCC and LCW activities will be central in this phase. This will be done through a clear focus on fostering citizen-scientist-practitioner interaction through the LCC and LCWs, enhancing the know-how in terms of understanding diversity and creating better use of existing SMCS related technologies in disaster management.

As discussed in this strategy, LINKS is based on a transparent mechanism to make sure that the involvement in research activities is voluntary and that participants are promised anonymity and confidentiality where relevant (see Section 3). Equally important is the fact that participants in LINKS research activities will be treated with human dignity, and that the rights, values and interests of research participants are protected through these mechanisms as is the objective of this strategy.

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Identification of priority groups will be carried out during the project, with the support of all the participants. As established in the GA, different broad stakeholders' categories have been already identified (but could be implemented) as relevant for the development of the project and in particular: practitioners, policy/decision makers, scientific community, industry, and citizens (in depth definitions in D8.1). These categories are also considered as potential recipients of the SIS here provided. Specific outputs will be expected from the different groups, in particular during workshops (WP8) and the development of case studies (WP6).

6.3.1 Practitioners

In the LINKS project (and as reported in D8.1), a practitioner is a person qualified or employed in the fields relevant for LINKS research areas, like security, safety and civil protection. Accordingly, different levels of governance are considered in the project (international/European, regional, national and local level). Practitioners are one of the main recipient groups of the project, so they will participate actively to the activities and to the identification of the societal impacts expected by the project. They will also contribute to the evaluation process of the project, helping to identify gaps and difficulties in the achievement of the societal impacts during research activities, and also providing their societal impacts assessment reports (see Section 6.2).

6.3.2 Policy and decision makers

Policy and decision makers are a relevant index of the SIS of the project. Their involvement will give more possibilities to produce effects on practices and policies in the long-term. Moreover, they could contribute to adopt better behaviours in the face of risks, updating strategies and practices. Then, they are responsible for taking measures to reduce vulnerabilities and marginalization.

6.3.3 Scientific Community

The main societal impact expected in relation to the scientific community is linked with publication and improvement of scientific knowledge and debate. The interaction with academics, research networks and related projects is also another indicator to value the societal impact capacity of the project. In depth literature review, as expected to be produced as D2.1, D2.2, D3.1, D4.1, will be useful to identify gaps, and to reduce the risks of negative outcomes coming from the use of specific methodologies and actions. Moreover, dialogue with related projects would be useful to avoid potential mistakes already experienced and to promote improvement in research and activities development.

6.3.4 Industry

About industry, they represent a potential resource in implementing positive outcomes, making, for instance, knowledge and technology available and promoting knowledge transfer/knowledge innovation. On the other side, hazards that hit industrial and business activities can have relevant

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impacts on local societies and economies with consequences also on the other stakeholders. LINKS may provide relevant information to help in promoting better preparation among specific social groups like employees, in front of the different risks. Conflicts could emerge, e.g., about issues of environmental and social justice, especially in areas exposed to technological risks. Conflicts should be managed with the aim to promote dialogue and diversity.

6.3.5 Citizens

Citizens, especially in case studies, are one of the main beneficiaries of the project, and thus a relevant indicator of the success of this strategy. People will be involved in different ways in research activities, adopting several levels of participation (see also following section on vulnerable groups). Citizens are also thought in this project as one of the main potential sources of information and the starting point in terms of vulnerability reduction and resilience improvement. This category includes also bottom-up processes and non-organized movements and volunteers. These kinds of processes can represent a relevant resource in disaster risk management. Accordingly, LINKS should work also considering spontaneous actions and their interaction with traditional and official systems of response.

6.3.5.1 Civil society

According to UN definition, civil society refers to civil society organizations and non-governmental organizations (NGO). Accordingly, this includes educational institutions, organized volunteers' groups, and others. The role of these groups in LINKS project is relevant. They could offer a different perspective on the disaster risk management processes, helping to better focus on e.g. vulnerable groups or specific social groups that usually risk staying at the margins of the process. Their feedbacks will be taken along the life of the project, using different methodologies, like surveys and participatory processes, and their participation will be fundamental for the success of LINKS and of this strategy. Limiting the research to practitioners and policy makers could reduce the chance to reach plurality with consequences also on the usefulness of the LINKS framework.

6.3.5.2 Vulnerable groups

Given the topic of research, vulnerable individuals and groups will be considered in the overall development of the project. An in-dept description of them will be provided as part of D2.1.

Accordingly, LINKS may involve (wherever it is necessary and with the will to avoid any risk for them - methods will be evaluated according to Section 3) representatives of vulnerable groups with the aim of guaranteeing the right to equity and equality in the process, and promoting inclusiveness. According to the case studies and the geographical contexts, specific vulnerable groups will be identified. This might include persons or groups who have experienced disasters and crises in the past, and who might have traumatic memories associated with them. Particular attention to the

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sustainability of the process will be paid with the aim to respect the sensibility of individuals and to guarantee physical and mental safety and security conditions during the processes (see Section 3.1.3).

Planning research with vulnerable groups will necessarily ask to start answering the following questions, as relevant for a good and solid societal impact assessment of the project:

- Can I avoid involving this people? Is there another way to obtain the same information? Is their participation essential for the success of the research?
- Which are the potential impacts of my research on them? Could I increase their vulnerability?
- How is my work useful for them? Who is the main beneficiary of the research?
- Have I adequately planned measures of mitigation to reduce my impact on their life?
- Have I adequately adapted the research to their capacities/abilities/sensitivities?
- How will my presence produce effects on their behaviour and perception of the future? Have I adopted adequate systems of assessment of research impacts, involving them in the evaluation process?

Furthermore, LINKS has the specific ambition to innovate in three areas: scientific innovation, technical products and services, and processes, procedures and policies (see D8.1). These areas will likely impact the different stakeholder groups above in different ways:

- Scientific innovation: scientific knowledge improvements are expected in terms of conceptual approaches and methods of research in the field of SMCS in disaster studies, and especially discussing the role of diversity
- Technical products and services: this will be reached adopting participatory processes that encourage a knowledge sharing regarding SMCS technology products and services, such as guidelines and tools
- Processes, procedures and policies: DMPs are expected to have the main benefits in this area, updating guidelines and procedures, building awareness and increasing the role of diversity in policy production

With the assistance of the LINKS Innovation Manager (EOS), LINKS will ensure that relevant elements within the project Innovation Management Plan can further be assessed in terms of their societal and ethical impacts in the project as part of the related assessment procedures.

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7. CONCLUSION

The Ethics and SIS has been drawn to guide the ethical conduct of LINKS partners and the societal impacts expected by the project, avoiding any negative consequence on the local communities, stakeholders and researchers involved. Accordingly, throughout the project, LINKS partners will ensure that their activities respect the ethical principles and guidelines provided in this strategy in compliance with the European Code of Conduct and Research Integrity, the Ethics Policy of the EC established for the HORIZON 2020 Programme, as well as relevant national and European legislation (as specified in Section 2.1).

In particular, within the LINKS project the main ethical and societal impact issues identified and addressed in this document are related to:

- The management of diversity throughout the project, e.g. adopting prevention strategies if necessary (entire document)
- The human interactions that can occur during research activities like (but not limited to) interviews, workshops, living labs, P(A)R, and surveys, considering also possible online research methods (Section 3)
- The processing and use of data and how to avoid risks for participants' privacy and rights (Section 3)
- The process of ethical reviews, monitoring and assessments (Section 4)
- The workers' rights and duties, e.g. publishing of the research results (which involves co-authoring, rights to data and publications), as well as project governance and decision-making (Section 5)
- The impacts of the project on society according to H2020 finalities, e.g. planning research methods to reach them, their assessment, and project potentialities in terms of innovation (Section 6)

To conclude, this strategy is a living document and it will be implemented and updated whenever needed during the lifetime of project. Changes to the document will be adequately documented in the reports that will follow according to WP1 plan in Months 18 and 42.

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CHILD SAFEGUARDING POLICY AND CODE OF CONDUCT

A SERIES OF RULES OF BEHAVIOUR DEVISED BY SAVE THE CHILDREN TO PROTECT CHILDREN FROM ANYONE, INCLUDING THOSE WHO PROTECT THEM

Save the Children
Italia ONLUS

Save the Children is the largest independent international organisation working to improve the lives of children in Italy and throughout the world.

Our vision is of a world in which the right of every child to survive, be protected, develop and participate is guaranteed.

Our mission is to promote significant improvements in the way in which the world treats children and bring about immediate, lasting changes to their lives.

Last updated April 2013

This Policy was approved by the Board of Save the Children Italy on 19 April 2013 and is based on the Child Safeguarding Protocol adopted by the Board of Save the Children International on 9 March 2010.

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CHILD SAFEGUARDING POLICY AND CODE OF CONDUCT

Index

	CHILD SAFEGUARDING POLICY AND CODE OF CONDUCT	Pag. 2
1.	Our mission in the field of child safeguarding	Pag. 2
2.	Our commitments to children	Pag. 2
3.	Definitions and Fields of Application of the Policy	Pag 3
4.	Glossary	Pag. 3
5.	Procedures for the Safeguarding of Children	Pag. 4
6.	Standards and Criteria of the Child Safeguarding Policy	Pag. 6
	6.1 Awareness Raising and Prevention	Pag. 6
	6.2 Reporting and Responding	Pag. 7
7.	Responsibilities	Pag. 9
8.	Procedures Relating to the National Headquarters of Save the Children Italy	Pag. 9
	CODE OF CONDUCT	Pag. 10

CHILD SAFEGUARDING POLICY AND CODE OF CONDUCT

1.
Our mission in the field of child safeguarding

Save the Children Italy aims to be a child-safe organisation.

Anyone who works with Save the Children Italy in whatever capacity must be made fully aware of the dangers of exploitation and abuse, above all of a sexual nature, that children face.

Save the Children Italy will do everything in its power to prevent, report and respond to such problems.

The highest standards must be adhered to at all times by the staff of Save the Children Italy and its partner organisations and their representatives when dealing with children, as outlined in this Child Safeguarding Policy (henceforth referred to as "**the Policy**"). These standards apply to both the private and professional life of staff and anybody else who carries out whatever kind of activity for the organisation.

2.
Our commitments to children

As a group of individuals and organisations working together to create a global movement to defend the rights of children, Save the Children Italy has the following commitments as regards children:

Awareness: we are committed to ensuring that the staff of Save the Children Italy and partner organisations and their volunteers are fully aware of the problems linked to sexual exploitation, and of the associated risks for children. The children themselves and their families will be informed in the most appropriate way of the rules concerning the behaviour they should expect from staff and representatives, and of how they may report any eventual cases of alleged abuse.

Prevention: we are committed to ensuring that the staff of Save the Children Italy and partner organisations and their volunteers minimise all risks so as to prevent any harm being done to children. It is necessary to create an environment in which the rights of children are always safeguarded and the likelihood of abuse prevented.

Reporting: we are committed to ensuring that the staff of Save the Children Italy and partner organisations and their volunteers are clear about when it is necessary to report a concern of possible abuse and what action should be taken.

Responding: we are committed to ensuring that effective action is taken in response to any report of abuse by supporting, assisting and protecting the child involved.

3.
Definitions and Fields of Application of the Policy

This Policy includes the mandatory requirements that are applied to every aspect and area of the work of Save the Children Italy: fundraising, awareness-raising, campaigns, communication and marketing, and the development of humanitarian and emergency intervention.

Any report of exploitation or abuse, including of a sexual nature, will be handled according to the General Procedure for the Safeguarding of Children (henceforth "**the General Procedure**") linked to this Policy in line with the disciplinary procedures of Save the Children Italy and current legislation.

This Policy applies to:

- members of the Governing Board, Supervisory Board, Assembly and volunteers;
- staff of Save the Children Italy hired on any kind of contract whatsoever (henceforth "**the staff of Save the Children Italy**").
- donors, journalists, celebrities, and anyone else directly involved in the projects or services of Save the Children Italy;
- staff and representatives of partner organisations and any other individual, group or organisation that has formal/contractual relations with Save the Children Italy involving direct contact with children (henceforth "the staff of partner organisations");

The staff of Save the Children and partner organisations and their representatives must adhere to this Policy in both their professional and private lives.

4.
Glossary

Here are the key definitions:

- **Child**: this term includes children of all ages and so the policy deals with the protection of all persons under the age of 18.

- **Child abuse**: any acts that may cause physical or psychological harm to a child, directly or indirectly result in harm to a child, or damage the prospects of a child's safe and healthy development into adulthood[1]; the main categories of abuse are defined by the World Health Organisation as physical violence, emotional violence, neglect and negligent treatment, and sexual exploitation and abuse[2].

- **Sexual exploitation of a child**: the abuse of a position of vulnerability, differential power, or trust in relation to a child for sexual purposes, whether successful or not; this includes – but is not limited to – profiting monetarily, socially or politically from the sexual exploitation.

Save the Children Italy considers that:

- any sexual activity without consent is to be considered abuse and is a criminal offence
- any sexual activity with a child under the age of legal consent of the country in which s/he lives, irrespective of whether s/he gave her/his consent, is to be considered abuse

- consensual sexual activity with a child over the age of legal consent of the country in which s/he lives, but under the age of 18 (even though it is not a crime), will in any case be treated as a breach of this Policy and Code of Conduct.

5.
Procedures for the Safeguarding of Children

Save the Children Italy establishes the General Procedure for reporting and dealing with cases of suspected maltreatment, abuse or exploitation of children.
In particular, the General Procedure requires as follows:

The Governing Board must elect one of its members to be responsible for the implementation of this Policy.

The General Director is responsible for ensuring that a national mapping is carried out of the infrastructure and services for the safeguarding of children in those areas in which Save the Children Italy operates, providing information concerning the policies, procedures, practices, contact points and services.

The General Director must ensure that, on the basis of the information provided by the mapping, national and local procedures are developed and implemented to respond to reports of possible cases of abuse and manage any subsequent action taken.

Any breaches of the Policy must be reported centrally to the Child Safeguarding Policy manager as the national Focal Point for Child Safeguarding.
As prescribed by the General Procedure, the Head of the Resources and Organisational Development

Division, as the National Manager of the General Procedure, must be informed of any complaints received and be directly involved in the handling of these complaints.

Reports assessing the implementation of the Policy are submitted every six months to the contact Member of the Governing Board for this Policy.

[1] Children can be abused by people they know or, more rarely, by people they do not know; within the family, in an institutional or community setting, or during procedures that cause real or potential harm to their health, survival, development or dignity.

[2] Law 172 of 1.10.2012 (which ratifies the Lanzarote Convention in Italy) defines as sexual exploitation and abuse any acts of a sexual nature with children (with the age thresholds specified in Art. 609 of the Criminal Code), the exploitation of prostitution, child pornography, the corruption of children and child grooming on the internet. Art. 609b of the Criminal Code makes it illegal, in particular, to engage in sexual activity with children under the age of 14; the age limit is raised to 16 years in the case of a grandparent, parent (also adoptive), partner of a parent, guardian or any other person to whom the child has been entrusted for treatment, guidance, education, protection or custody, or who lives together with the child. In addition to the situations described in Article 609b, a grandparent, parent (also adoptive), partner of a parent, or guardian who, abusing the power invested in her/him by virtue of her/his position, engages in sexual activity with a child aged 16 and over can be punished with a custodial sentence of 3-6 years. A child engaging in sexual activity with another child aged 13 or over is not, however, punishable by law so long as the age difference between the two children does not exceed three years.

The staff and volunteers of Save the Children Italy, when signing any type of employment contract or describing their activities as volunteers, must receive and fully understand:

- the Child Safeguarding Policy, which includes the Code of Conduct;

- the General Procedure, which includes all the necessary information concerning who should be contacted to report a complaint.

All the partners and other organisations that have a formal contractual relationship with Save the Children Italy involving direct contact with children must include in their contracts the obligation to:
adhere to every aspect of this Policy and know how to proceed should they have to report an alleged case of child abuse;

- adhere to the Code of Conduct included in the Policy.
- Any alleged breach of the Policy must be reported and investigated in accordance with the Policy itself and the relative General Procedure. Any breach of the Policy may result in disciplinary action which, in the most serious cases, may result in the termination of the person's contract.

All the staff of Save the Children Italy, its volunteers and the staff of partner organisations must:

- promote an environment that is open to listening in relation to the safeguarding children in order to facilitate the discussion of problems and/or the reporting of alleged cases of abuse of children;

- ensure that there is a shared sense of responsibility among staff as regards the safeguarding of children;

- encourage children to discuss their problems and concerns;

- make parents and guardians aware of the rights of children, and of what is acceptable and what is not acceptable;
- explain clearly to parents and tutors the kind of professional behaviour they can expect from the staff of Save the Children Italy, representatives and partner organisations, and explain in detail what they can do in the case of problems relating to cases of abuse of children.

6.
Standards and Criteria of the Child Safeguarding Policy

The following standards and criteria define the minimum levels for a suitable implementation of the Policy and its monitoring and assessment. These standards and criteria will be checked regularly and updated where necessary.

6.1
Awareness Raising and Prevention

a) **Dissemination and awareness raising**
Save the Children Italy ensures that there is broad dissemination of the Policy, the relative Procedure and the Code of Conduct. The dissemination must obviously include the staff of Save the Children Italy, its partner organisations, their volunteers and, above all, children and those who look after them.
The dissemination is carried out in such a way as to ensure that the Policy and Code of Conduct are fully understood. This may involve translations into the languages of beneficiaries and the production of child-friendly material.

b) **Staff recruitment and selection**
The recruitment and selection of staff, and also other collaborators or volunteers, must reflect Save the Children Italy's commitment to the safeguarding of children, ensuring that the necessary checks and procedures are in place to prevent anyone unsuitable from working with children.
Successful candidates are informed of the binding nature of this Policy, the relative General Procedure and the Code of Conduct, and of the fact that the principles contained in these documents must be adhered to in both the professional and private life of the person.

c) **Implementation of the Policy in Management Systems and Processes**
The Policy must be incorporated into all existing and future management systems and processes of Save the Children Italy that affect the safeguarding of children so as to create an environment in which the rights of children are respected.
The Policy must be reflected in every measure concerning human resources and general management to guide staff in the carrying out their work. Failure to comply with any aspect of the Policy contained in any of these measures will be considered a serious breach of discipline.
The costs of implementing the Policy must be included when preparing any operational plans, budgets or funding proposals of Save the Children Italy.

d) **Risk Assessment and Management**
All the activities carried out by Save the Children Italy involving children (whether they are of a humanitarian nature or are related to programmes, communication or fundraising) must be carefully assessed to ensure that every kind of risk for children is identified and suitable checks and controls are developed.

e) **Training and Development**
The staff of Save the Children Italy, its volunteers and the staff of partner organisations must be assisted in developing the necessary skills, knowledge and experience for the safeguarding of children in line with their role within the organisation. The staff who have to deal with complaints of sexual exploitation or abuse are provided with suitable training so that they can respond to and deal with the complaints. The core principles of the Policy, Code of Conduct and General

Procedure must be included in the induction training of staff, and in all subsequent training.

f) **Agreements with Partner Organisations and Training**
Any agreements between Save the Children Italy and its partner organisations must include clauses regarding the Child Safeguarding Policy.
Partner organisations must adopt the Policy or have already developed their own policies with a similar approach and standards. The agreements with partners must highlight very clearly the agreed procedures for reporting and investigating cases relating to breaches of the Policy.
Save the Children Italy will have a clear plan to develop the skills of its partners in this sector, so that they can develop the necessary policies and procedures, also using resources developed within Save the Children Italy.

g) **Information and Communication Technologies**
In the use of information and communication technologies, such as the Internet, websites, social networks and digital photography, Save the Children Italy takes the utmost care to ensure that children are not exposed to any risks.

6.2
Reporting and Responding

a) **Centralised System**
In accordance with current legislation on privacy, Save the Children Italy has a system that makes it possible to report, record and evaluate centrally the complaints received and dealt with locally.

b) **The General Procedure and Local Complaints Procedures**
The General Procedure and local complaints procedures provide a detailed list of what must be done when a complaint is received. A distinction is made between cases originating outside the organisation and cases involving the staff of Save the Children Italy, its volunteers or the staff of partner organisations, as well as cases in which the beneficiaries are the alleged perpetrators of the abuse.
The General Procedure and local procedures contain indications as to how and when to report alleged cases of abuse to the competent authorities, local services and specialised local structures for the protection of children.

c) **Obligations of the Staff of Save the Children Italy and its Partners**
The staff of Save the Children Italy, its volunteers and the staff of partner organisations must report any suspicion of exploitation or abuse involving children when the alleged perpetrator is a member of staff, whether it is the result of a specific complaint or just unconfirmed suspicions.
The primary concern of any member of staff informed of a case of abuse is always to protect the child.
The General Procedure and local procedures for reporting cases allow staff to report cases of abuse even when the alleged perpetrator is external to the organisation.
The reports must be made immediately and in any case within 24 hours unless it is impossible or unfeasible to do so or there are exceptional circumstances that prevent the report from being made.

d) **Staff Roles and Responsibilities**
The staff and Heads of Division, Department and Unit must all be aware of their own roles and responsibilities in reporting and responding to complaints of alleged sexual exploitation or abuse in accordance with the General Procedure and national legislation.

The General Director will appoint a National Focal Point for child safeguarding[3]
The roles and responsibilities of every member of staff must be clearly specified:

- of staff in reporting any suspicions or alleged breaches of the Policy;
- of Focal Points in handling any such reports;
- of Heads of Division, Department and Unit in responding to and managing cases;
- of the National Focal Point in dealing with reports, and coordinating the evaluation and response process;
- of the Head of the Resources and Organisational Development Division in the operating of a centralised system for the reporting of cases to ensure the management control of these cases.

All these people must receive suitable training, guidance and support.
Save the Children Italy provides standardised forms in the General Procedure to record information and register the main details concerning suspected cases abuse.

e) **Principles and practices in responding to accusations of exploitation or abuse**
When responding to accusations of sexual exploitation or abuse of children, staff and the Heads of Division, Department and Unit follow the General Procedure and always proceed taking into account the best interests of victims and witnesses, their safety and physical and mental well-being, and their rights to privacy, equality and fair justice.
Staff of Save the Children Italy will be asked to cooperate in any investigations and maintain appropriate levels of confidentiality. Any failure to fulfil this obligation will be considered a breach of discipline, which may be punished, in the most serious cases, with the termination of their employment contract.
For a more detailed description of the principles and practices referred to in this section, see the General Procedure.

f) **Learning from experience**
The lessons learnt as regards the implementation of this Policy and the handling of specific episodes will be used to improve the Policy and develop the best practices.

f) **Awareness**
The staff of Save the Children Italy, its volunteers and staff of partner organisations must be aware of what action can be taken against the alleged perpetrator of abuse, which includes:

- referring the matter to the competent authorities for judicial investigations in accordance with the law;
- internal disciplinary procedures, which may result in the person losing their job or a contract being terminated.

[3] In addition to the National Focal Point, namely the Child Safeguarding manager, local Focal Points may also be appointed at different levels of Save the Children Italy.

7.

Responsibilities

The General Director has full responsibility for the creation of a working environment that facilitates the implementation and development of the principles of the Policy.

The staff of Save the Children Italy, in line with their own specific functional responsibilities, have full responsibility for creating an identical working environment wherever their project is being carried out.

The General Director is responsible for delegating responsibility relating to the Policy within the team of Save the Children Italy, including the creation of a National Focal Point for child safeguarding.

8.

Procedures Relating to the National Headquarters of Save the Children Italy

The General Director is responsible for ensuring that all members of the Governing Board, staff and volunteers know the Policy, asking them to sign a declaration in which they state that they have received and accept the Policy.
The Head of Resources and Organisational Development Division, as the person in charge of the General Policy at a national level[4]:

- establishes and maintains a centralised system of reporting, ensuring management control of cases regarding alleged breaches of the Policy;
- establishes and maintains a system of regular contacts with the international Child Safeguarding managers of Save the Children;
- prepares the communications that the Director General must submit to the Governing Board;
- regularly checks and updates the Policy, at least every three years or sooner should this be deemed it necessary.

[4] Or whoever else is appointed to carry out this task by the Director General.

CODE OF CONDUCT

The staff of Save the Children and partner organisations and their representatives must never:

1) hit, physically assault or physically or psychologically abuse children;
2) act in ways towards children that – also from a psychological point of view – may have a negative effect on their development, including their social and relational development;
3) act in ways that set a negative example for any children present;
4) engage in sexual activity or have sexual relations with anyone under 18 years of age, irrespective of the definition of the age of majority or the way in which consent is legally recognised in the different countries – believing that a child is older than s/he, in fact, is cannot be considered an acceptable defence;
5) have relations with a child that can in any way be considered exploitation, maltreatment or abuse;
6) act in ways that may be abusive or put a child at risk of exploitation, maltreatment or abuse;
7) use language, make suggestions or offer advice that is inappropriate, offensive or abusive;
8) behave in a manner that is inappropriate or sexually provocative;
9) establish or engage in "continuous" contacts with beneficiary children using online personal communication (e-mail, chats, social networks etc.) – only professional online tools and environments the organisation knows about may be used and, where possible, a work landline or cellphone for telephone contacts;
10) allow one or more children with whom you are working to sleep at your home unsupervised or without previous authorisation from your line manager, except in exceptional circumstances;
11) sleep in the same room or bed as a child with whom you are working;
12) do things for children of a personal nature that they can do themselves;
13) give money or goods or other benefits to a child that go beyond the parameters or purposes established by the project or without your line manager being aware of this;
14) condone or participate in behaviour by children that is illegal, abusive or endangers their safety;
15) act in ways intended to shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of emotional abuse;
16) discriminate against, show differential treatment towards or favour particular children to the exclusion of others.

Questa lista non è esaustiva o esclusiva. Il principio di base è che si devono evitare azioni o comportamenti che possano essere inappropriati o potenzialmente abusivi nei riguardi dei minori.

È importante inoltre che il personale di Save the Children, i volontari, il personale di organizzazioni Partner ed i loro rappresentanti a contatto con i minori:

17) are quick to identify situations that may place a child at risk and know how to deal with such situations;
18) report any concerns, suspicions or certainties about possible abuse or maltreatment of a child in accordance with the General Procedure and this Policy;
19) organise work and the workplace in such a way as to minimise any risks;
20) always be as visible as possible to other adults when working with children;
21) foster and maintain an open culture which allows staff, volunteers, children and the people looking after them to raise and easily discuss any type of topic or concern;
22) ensure that members of staff develop a sense of responsibility with regard to the way they operate so that any actions or forms behaviour that are inappropriate or may lead to abuse of children do not go unnoticed or are tolerated;

23) inform children of the type of relationship they can expect to have with the staff or representatives and encourage them to report any concerns they might have;
24) make full use of the children's skills and abilities, and discuss with them their rights, what is acceptable and what is not acceptable, and what they can do if they have a problem;
25) maintain the highest personal and professional profile;
26) respect children's rights and treat children in a fair and honest way with dignity and respect;
27) encourage the participation of children so they can develop the ability to safeguard themselves.

Save the Children is the largest independent international organisation working to improve the lives of children in Italy and throughout the world. Set up in 1919, it operates in 119 countries to guarantee all children health, protection, education, economic development and food safety, and to promote the involvement of all children. Moreover, it responds to emergencies caused by conflicts or natural disasters.

Save the Children was set up as a non-profit organisation in Italy at the end of 1998 and began operating in 1999. It is now an NGO recognised by the Ministry of Foreign Affairs. For more than 10 years it has been working in Italy to protect children, especially migrant children; to teach children how to use new technologies and fight child pornography online; to promote the rights of the child and combat poverty, dropping out of school and social exclusion. Moreover, it responds rapidly to emergencies, supporting children and their families.

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CHILD SAFEGUARDING POLICY
AND CODE OF CONDUCT

GENERAL PROCEDURE FOR REPORTING AND RESPONDING TO SUSPECTED MALTREATMENT, ABUSE OR EXPLOITATION OF CHILDREN

A SERIES OF RULES OF BEHAVIOUR DEVISED BY SAVE THE CHILDREN TO PROTECT CHILDREN FROM ANYONE, INCLUDING THOSE WHO PROTECT THEM

Save the Children
Italia ONLUS

Save the Children is the largest independent international organisation working to improve the lives of children in Italy and throughout the world.

Our vision is of a world in which the right of every child to survive, be protected, develop and participate is guaranteed.

Our mission is to promote significant improvements in the way in which the world treats children and bring about immediate, lasting changes to their lives.

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GENERAL PROCEDURE FOR REPORTING AND RESPONDING TO SUSPECTED MALTREATMENT, ABUSE OR EXPLOITATION OF CHILDREN

Index

1.	Introduction	Pag. 2
2.	Definitions and fields of application	Pag. 2
3.	Core principles	Pag. 4
4.	Awareness and dissemination of the general procedure	Pag. 5
5.	Collaborating with partners	Pag. 5
6.	General procedure	Pag. 6
	Case 1	Pag. 6
	Flow Chart – Case 1	Pag. 8
	Case 2	Pag. 9
	Flow Chart- Case 2	Pag. 11
	Case 3	Pag.12
	Flow Chart- Case 3	Pag. 15
	Case 4	Pag. 16
	Flow Chart- Case 4	Pag. 18
	Case 5	Pag. 19
	Flow Chart- Case 5	Pag. 22
7.	Appendices	Pag. 23
	Appendices 1. Declaration of acceptance	Pag. 25
	Appendices 2. Key Contact Details	Pag. 27
	Appendices 3. Report Form	Pag. 28
	Appendices 4. Self-declaration	Pag. 29

1. Introduction

The maltreatment, exploitation and abuse of children is common to all countries and societies, constituting a violation of their fundamental rights. Violence against children is never acceptable and an overall commitment to the protection of children's rights means that Save the Children is especially committed to protecting all the children with whom the organisation comes into direct contact.

The aim of this procedure (henceforth "**the General Procedure**") is to ensure that the reporting and response to any concerns, suspicions or certainties regarding breaches of the Code of Conduct in relation to the maltreatment, abuse or exploitation of children by staff or volunteers of Save the Children or one of its partner organisations are handled as quickly and efficiently as possible in line with the principles set out in the Child Safeguarding Policy (of which the General Procedure is an integral part). The General Procedure also applies to cases in which persons from outside the organisation are suspected or accused.

This General Procedure is compulsory for the staff of Save the Children, its volunteers and the staff of partner organisations. Any complaints of maltreatment, abuse or exploitation, including of a sexual nature, are dealt with following these guidelines, in line with Save the Children's internal disciplinary procedures and current national legislation. Any member of staff, representative, or member of staff of a partner organisation of Save the Children Italy may naturally immediately report any cases in which they believe a criminal offence has been committed to the law enforcement agencies[1].

2. Definitions and fields of application

The General Procedure applies to:

- members of the Governing Board, the General Assembly and the Supervisory Board, and volunteers (henceforth "**the representatives**");
- staff of Save the Children Italy, hired on any kind of contract whatsoever (henceforth "**the staff of Save the Children**");
- staff and representatives of partner organisations and any other individual, group or organisation that has relations of a formal/contractual nature with Save the Children involving any type of direct contact with children (henceforth "**the staff of partner organisations**"):
- donors, journalists, celebrities, politicians and anyone else directly involved in the projects or services of Save the Children for as long as this direct contact lasts (henceforth "**visitors**").

[1] They must also immediately inform their line manager and National Focal Point.

Key definitions:

- **Child**: this term includes children of all ages and so the General Procedurey deals with the protection of all persons under the age of 18.

- **Child abuse**: any acts that may cause physical or psychological harm to a child, directly or indirectly result in harm to a child, or damage the prospects of a child's safe and healthy development into adulthood[2].
  The main categories of abuse are defined by the World Health Organisation as physical violence, emotional violence, neglect and negligent treatment, and sexual exploitation and abuse[3].

- **Sexual exploitation of a child:** the abuse of a position of vulnerability, differential power, or trust in relation to a child for sexual purposes, including – but not limited to – profiting monetarily, socially or politically from the sexual exploitation.

The following are examples of situations that must be reported (the list is not exhaustive, however):

- A child reveals a case of abuse or bears signs that give rise to suspicions that the child or other children are being
  exploited or abused.

- A member of Save the Children Italy, one of its volunteers, or staff from a partner organisation discovers or suspects that a child has been exploited/abused or risks being exploited/abused.

- A family member or a member of the community informs staff of Save the Children Italy or one of its volunteers, or staff from a partner organisation that a child has been harmed or is at risk of being harmed.

- A member of staff of Save the Children Italy, one of its volunteers, or a member of staff of a partner organisation has breached the Code of Conduct.

- A member of staff of Save the Children Italy, one of its volunteers, or a member of staff of a partner organisation abuses a child s/he has come into contact with through the work s/he is engaged in for Save the Children Italy.

- A member of staff of Save the Children Italy, one of its volunteers, or a member of staff of a partner organisation abuses a child outside the working environment, a member of the child's family or a child with whom s/he has come into contact, or becomes a client of a child prostitute.

- A child with whom Save the Children Italy or one of its partners has contacts abuses another child;

[2] Children can be abused by people they know or, more rarely, by people they do not know; within the family, in an institutional or community setting, or during procedures that cause real or potential harm to their health, survival, development or dignity.

[3] Law 172 of 1.10.2012 (which ratifies the Lanzarote Convention in Italy) defines as sexual exploitation and abuse any acts of a sexual nature with children (with the age thresholds specified in Art. 609 of the Criminal Code), the exploitation of prostitution, child pornography, the corruption of children and child grooming on the internet. Art. 609b of the Criminal Code makes it illegal, in particular, to engage in sexual activity with children under the age of 14; the age limit is raised to 16 years in the case of a grandparent, parent (also adoptive), partner of a parent, guardian or any other person to whom the child has been entrusted for treatment, guidance, education, protection or custody, or who lives together with the child. In addition to the situations described in Article 609b, a grandparent, parent (also adoptive), partner of a parent, or guardian who, abusing the power invested in her/him by virtue of her/his position, engages in sexual activity with a child aged 16 and over can be punished with a custodial sentence of 3-6 years. A child engaging in sexual activity with another child aged 13 or over is not, however, punishable by law so long as the age difference between the two children does not exceed three years.

3.
Core principles

Al fine di tutelare al meglio i bambini, le bambine e gli adolescenti, Save the Children applica la Procedura Generale rispettando i seguenti principi guida:

3.1 Safety and welfare of children

The safety and welfare of children are of primary concern. No child should be put at risk by any action that is taken. The superior interests of the child will be consistently sought throughout the entire process of reporting, assessing and responding to a complaint.

3.2 Professionality and confidentiality for the duration of the process

All complaints will be dealt with professionally, confidentially and expeditiously. Save the Children Italy will take all concerns and complaints extremely seriously (even when they are anonymous) and will ensure that everyone involved is treated in a fair and equitable way.

The child victims of abuse, witnesses and subjects of the complaint all have a right to confidentiality. Confidentiality here means that any complaints made within the organisation should only be made known to the persons mentioned in this General Procedure. In other words, only those people who "need to know" will be informed, using a "chain of command" that is as short as possible in order to avoid potential leaks and the resultant violation of privacy. Confidentiality and privacy must be guaranteed at every stage, from the reporting of a case to the secure storing of records and documentation, and also as regards any disciplinary action taken against members of staff.

3.3 Respect for all parties concerned

Any member of staff who knowingly and wilfully reports false or malicious information concerning suspected maltreatment or abuse will face disciplinary action. Everyone concerned, including the subject of the complaint, must be treated with respect, dignity and sensitivity for the entire duration of the proceedings. The suspected or accused person must be informed as soon as possible that an internal investigation will be carried out and then kept informed of the progress of this investigation unless the law enforcement agencies or judicial authorities advise otherwise, or if this is not in the best interests of the child.

3.4 Dissemination and understanding of the procedures for reporting a case

Children and members of the community on whose behalf Save the Children is working shall be informed, in the most appropriate way, on how to report any concerns or suspicions of exploitation and abuse, above all of a sexual nature, whether these concerns or suspicions involve the staff of Save the Children, one of its volunteers, the staff of partner organisations, or anyone else.

3.5 Best practices for receiving and reporting information regarding suspected abuse

Listening to people and taking statements is a delicate matter, particularly when the person concerned is a child, and requires care, the respect of certain fundamental rules, experience and specific training. Save the Children Italy guarantees its staff basic training and the possibility of immediately receiving specific support from the National Focal Point or another person designated by the National Focal Point. A crucial part of reporting a complaint is the way in which the information about the suspected abuse is recorded and communicated. All essential information must be recorded immediately and accurately in order for a quick, objective assessment to be made. The Report Form (Appendix 4) has been designed to guide the process of collecting information and must be used internally to record and report any types of accusations, complaints or doubts concerning the possible abuse of children.

3.6 Access to the competent authorities

Any child who is a victim of abuse has the right to have access to justice through police investigations and criminal prosecution. The involving of the competent authorities must always be taken into consideration.

4.

Awareness and dissemination of the general procedure

The General Procedure, together with the Child Safeguarding Policy and the Code of Conduct and national legislation regarding abuse, is to be made available not only to the staff of Save the Children, its volunteers and the staff of partner organisations, but also to all other interested parties (institutions, family members, guardians, community representatives etc) so that Save the Children's approach to problems of this nature is made very clear.

The staff of Save the Children Italy, its volunteers and the staff of partner organisations must sign the Declaration of Acceptance of the Child Safeguarding Policy and the General Procedure (Appendix 1), and receive all the necessary documentation regarding their implementation.

The staff of Save the Children, its volunteers and the staff of partner organisations must receive ongoing training as regards the Policy and the relative General Procedure for Child Safeguarding throughmeetings, workshops and the dissemination of material.

5.

Collaborating with partners

When Save the Children collaborates with partner agencies or organisations, a written agreement must be signed in which the partner undertakes to apply the Policy and General Procedure, adapting its own internal procedures where necessary. Where a partner has its own Safeguarding Policy, this must be validated by Save the Children Italy and common procedures must be agreed upon for the reporting of any cases of abuse.
Save the Children Italy and its partners reserve the right to autonomously refer any reported cases of abuse to the competent authorities in the event of disagreement over what action should be taken.

The aim of the written agreement is to guarantee clarity regarding roles and responsibilities in the event of any action being taken so that:

- the action is taken considering the best interests of the child at risk;
- there is no duplication of the work being carried out;
- children are not subjected to pointless questioning.

6.
General procedure

In this section the **detailed General Procedure for reporting a complaint** is described for five different cases.

IN CASES 1 AND 3 STAFF MUST FILL IN THE "KEY CONTACT DETAILS" FORM (APPENDIX 2)

CASE 1	SUSPECTED PERPETRATOR	WHISTLE-BLOWER
	Member of staff or representative of Save the Children, or visitor	Member of staff or representative of Save the Children, or visitor

STAGE I

You must privately report your suspicions or certainties as soon as possible (by telephone, in person or in writing) to your line manager (by the end of the same working day and in any case within 24 hours). Preferably use the Report Form (Appendix 3), which must in any case be filled in, even at a later date.
If the suspected perpetrator is your line manager, you must bring the matter to the attention of the person above them to discuss the matter.
If, through circumstances beyond your control, this person cannot be reached within the specified timeframe, you may report the matter directly to another person listed in "**Key Contact Details**" (Appendix 2)

STAGE II

The person who received the complaint will confidentially inform the National Focal Point for Child Safeguarding (immediately, i.e. by the end of the same working day and in any case within 24 hours).
as soon as

STAGE III

The National Focal Point will quickly, and never more than 24 hours later, assess the information received andtogether with the manager who forwarded the complaint discuss how to proceed in relation to the Child Safeguarding Policy. The National Focal Point will then officially inform the Head of the Resources and Organisational Development Division of the complaint and these three persons will form a case management team (under the direction of the Head of the Resources and Organisational Development Division).

The case management team, after assessing the degree of urgency of the case and the most suitable timeframe, can decide to:

1. act on the basis of the information received, which has been reported in detail and assessed;
2. plan an internal inquiry, coordinated by the National Focal Point, with the sole aim of obtaining the necessary details or additional elements in order to be able to take any subsequent decisions in an informed way that is fair to everyone involved;
3. discuss and agree with the line manager of the subject of the complaint any eventual measures to be taken to lessen the risk to children who have been in contact with this person.

STAGE IV

The case management team, based on the information in its possession and depending on the seriousness of the case, can:

a. decide to mitigate or play down any concerns when, for example, following an initial assessment, important details are not confirmed;
b. decide to take disciplinary action against the subject of the complaint after first communicating this decision to the Unit manager and Head of Division of this person; the Head of the Resources and Organisational Development Division will be responsible for obtaining the approval of the General Director before the disciplinary action is imposed;
c. decide whether to refer the case to the judicial authorities, law enforcement agencies and social services (for the protection of the children involved); if they do, the team will convene a Crisis Unit, made up of the Management, the Head of Division of the subject of the complaint, the Head of the Resources and Organisational Development Division and the National Focal Point; the Crisis Unit may seek the opinions of one or more previously identified external experts.

The Crisis Unit is under the direct responsibility of the Management and has the task of:

- guaranteeing primarily the safety of the children and then of everyone else concerned, deciding on specific measures and an action plan;
- discussing and determining how best to inform and involve the child's parents or guardian;
- drafting the report or complaint for the judicial authorities, checking its contents (also consulting external experts) and delivering it following the best practices eventually agreed upon with the institution to which it is addressed;
- determining to what extent the subject of the complaint's contacts with children should be restricted until the case is closed, taking into consideration any instructions received from the law enforcement agencies or judicial authorities, and finding the most appropriate ways of guaranteeing the protection of the children when doing this;
- deciding on an internal action plan to monitor the progress of the case (including a subdivision of roles, responsibilities and timeframes) and to close the case;
- confidentially informing the Head of the Communications Division, on a strictly "need to know" basis, in order to prepare an eventual communications strategy;
- informing the member of the Governing Board responsible for Child Safeguarding of the decision to make an official report or complaint against the member of staff or representative of Save the Children.

STAGE V

All records and documentation will be stored securely by the National Focal Point for the duration of the case and shared, in the strictest confidence, only on a strictly "need to know" basis.

STAGE VI

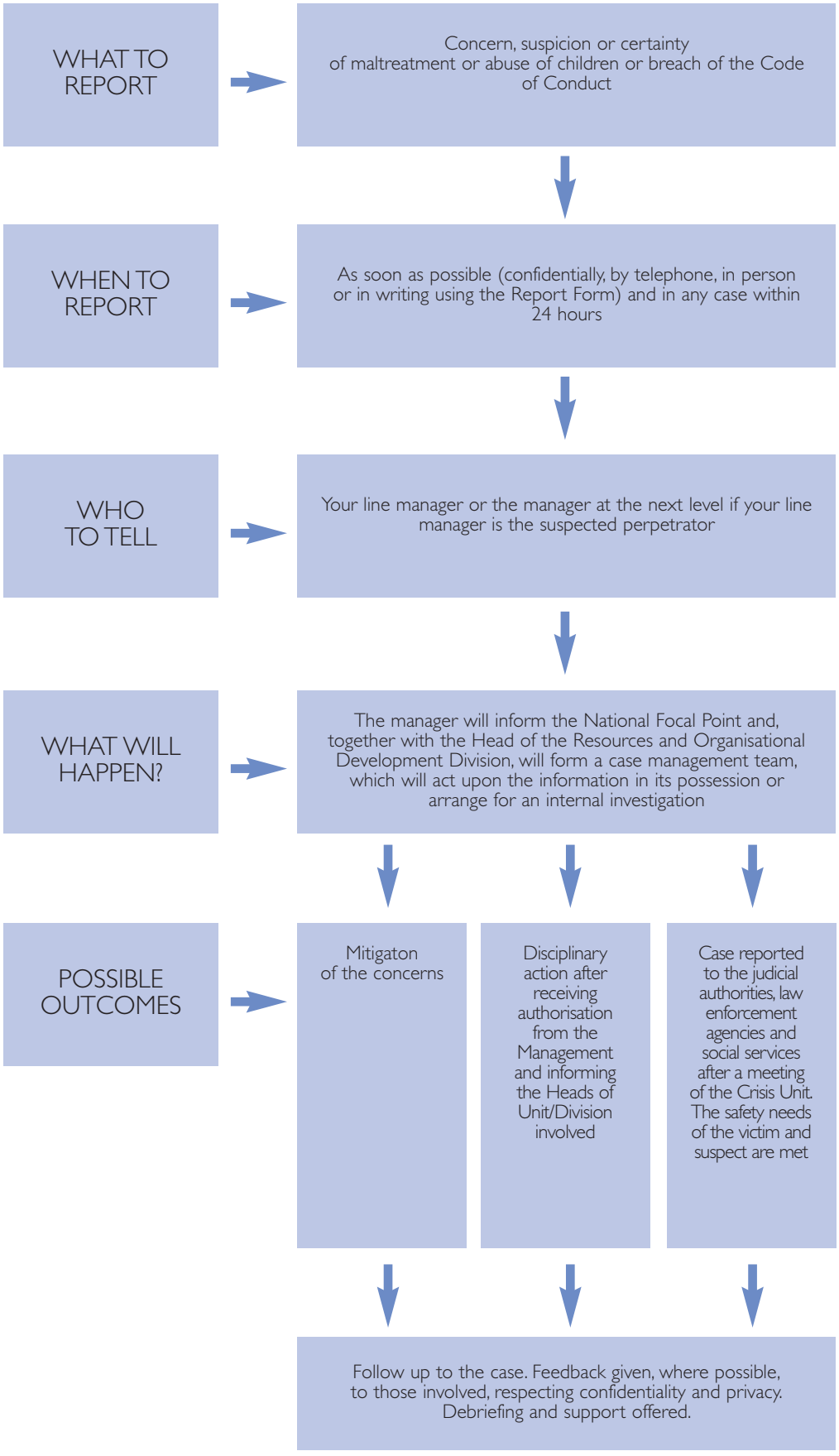
Adequate feedback and support will be provided for all those involved until the case has been closed.

STAGE VII

Registering of all complaints centrally and general anonymous information on the complaints sent to the Heads of Division and the representative of the Governing Board (on a six-monthly basis)

FLOW CHART- CASE 1

Suspected perpetrator: member of staff or representative of Save the Children, or visitor
Whistle-blower: member of staff or representative of Save the Children, or visitor



CASE 2	SUSPECTED PERPETRATOR	WHISTLE-BLOWER
	An adult external to Save the Children	Member of staff or representative of Save the Children, or visitor

PREMISE

The staff of Save the Children must report centrally any situation they find out about while working that might involve a criminal offence or is gravely prejudicial to the safety of a presumed child victim.

STAGE I

You must privately report your suspicions or certainties as soon as possible (by telephone, in person or in writing) to your line manager (by the end of the same working day and in any case within 24 hours). Preferably use the Report Form (Appendix 3) , which must in any case be filled in, even at a later date.

If, through circumstances beyond your control, this person cannot be reached within the specified timeframe, you may report the matter directly to another person listed in "**Key Contact Details**" (Appendix 2)

STAGE II

The person who received the complaint will carry out an initial assessment and then forward the complaint (by mail or fax) with the utmost urgency (and in any case always within 24 hours) to the National Focal Point and her/his direct Head of Unit/Department and/or Head of Division, providing an assessment of the degree of urgency involved.

STAGE III

The Head of Division will convene a meeting with the National Focal Point and the person who forwarded the complaint in a timefrime dictated by the degree of urgency. Together they form the case management team.

STAGE IV

The case management team will study the information they have received. They may decide to call upon other individuals from within the organisation who are considered useful in achieving a better assessment and handling of the case (first and foremost staff from the Policy and Law Unit and the Protection Unit, and then other internal experts).
Furthermore, they may already decide at this stage to hear other opinions or consult external experts on the matter, from both public institutions and third-sector bodies with whom the organisation has framework partnership agreements.
Once the persons who are considered useful in achieving a better assessment and handling of the case have been identified, they will together form the *Suspected Abuse Rapid Response Team* (henceforth *Response Team*).

STAGE V

Mandate of the *Response Team*:
Try and understand what has happened; assess how serious the situation is and confirm the degree of urgency; decide whether any further action needs to be taken to better understand what has happened, determining who should do what; ensure the safety of the child, identifying the action that needs to be taken; examine the legal aspects of how to proceed; reach a final decision on the case; decide on an action plan, with specific timeframes, roles and responsibilities, to close the case.

The Head of the Division involved is in charge of the *Response Team*.

The coordinating and supervising of the action plan are the responsibility of the National Focal Point.

After establishing the degree of urgency and timeframe, the *Response Team* could decide to:
1. act on the basis of the information received, which has been reported in detail and assessed;

2. plan an internal inquiry, coordinated by the National Focal Point, with the sole aim of obtaining the necessary details or additional elements in order to be able to take any subsequent decisions in an informed way that is fair to everyone involved;

3. discuss and agree on any eventual measures to be taken to lessen the risk to children who have been in contact with the subject of the complaint.

STAGE VI

Based on the information in its possession and depending on the seriousness of the case, the *Response Team* could:

a) decide to mitigate or play down any concerns when, following an initial assessment, important details are not confirmed;

b) assess whether to refer the case to the judicial authorities, law enforcement agencies and social services (for the protection of the children involved), in which case the opinion of the Management must be heard first; the Head of the Communications Division will be informed confidentially, on a strictly "need to know" basis, in order to draw up any eventual communications strategy.

At any stage of the assessment, the *Response Team* can seek the opinion of one or more external experts on the issue from public institutions and third-sector bodies with whomSave the Children already has framework partnership agreements.

STAGE VII

All records and documentation will be stored securely by the National Focal Point for the duration of the case and shared, in the strictest confidence, only on a strictly "need to know" basis.

STAGE VIII

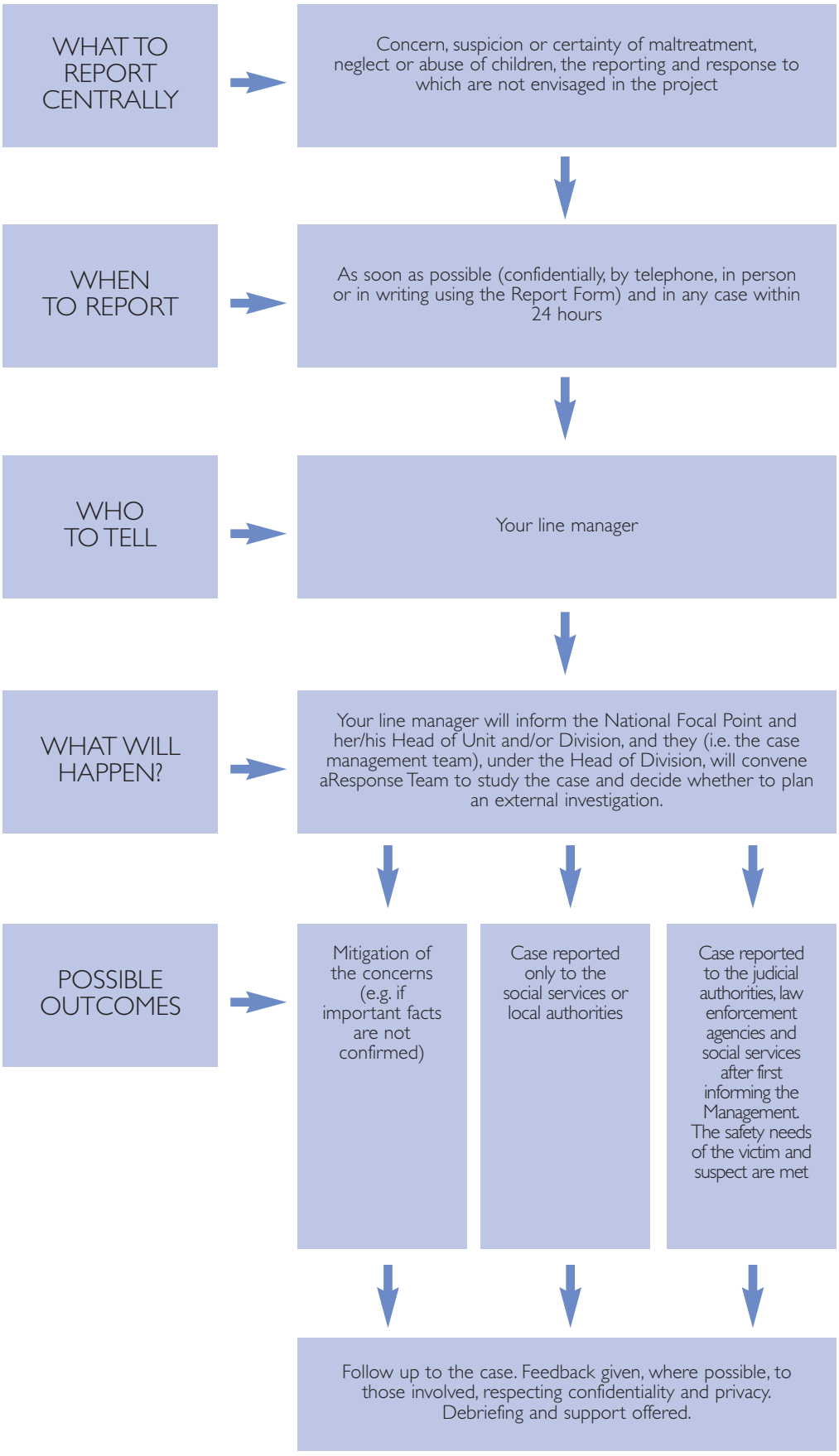
Adequate feedback and support will be provided for all those involved until the case has been closed.

STAGE IX

Registering of all complaints centrally and general anonymous information on the complaints sent to the Heads of Division and the representative of the Governing Board (on a six-monthly basis)

FLOW CHART-CASE TWO

Suspected perpetrator: adult external to Save the Children
Whistle-blower: member of staff or representative of Save the Children, or visitor



CASE 3	SUSPECTED PERPETRATOR	WHISTLE-BLOWER
	Member of staff or representative of a partner organisation	Member of staff or representative of a partner organisation

The partner will proceed as indicated in the written agreement with Save the Children, which will have identified one of the following situations:

a) The partner organisation had its own Child Safeguarding Policy and General Procedure when the partnership began, already examined and accepted by Save the Children Italy.

b) The partner organisation did not have its own Child Safeguarding Policy, Code of Conduct and General Procedure when the partnership began. Having, therefore, signed the documents of Save the Children Italy, its staff must refer to these when reporting and responding to cases of suspected maltreatment and abuse or breaches of the Code of Conduct occurring within the projects or activities in which it is a partner of Save the Children.

Situation a) The partner, when the partnership began, had its own Child Safeguarding Policy and General Procedure, which were ratified by Save the Children Italy

STAGE I

The partner will activate its own Procedure for Child Safeguarding, which has already been ratified by Save the Children.

STAGE II

The internal contact designated by the partner organisation (the person who receives the complaints) will inform Save the Children (generally during the same working day) via the project manager or the Head of Unit representing the partnership. This person will then inform her/his own Head of Division and the National Focal Point.
Save the Children may ask for written confirmation in cases in which they have only been informed by word of mouth.

STAGE III

The National Focal Point of Save the Children will follow the partner throughout the process of reporting andhandling the case.

STAGE IV

The partner will act according to a pre-established timeframe and provide specific details to Save the Children. The partner will record all the information in writing and will keep this information securely.

STAGE V

The partner will provide Save the Children with constant feedback regarding any action taken and the results of this action (generally within three months).

Situation b) The partner organisation, when the partnership began, did not have its own Child Safeguarding Policy, Code of Conduct and General Procedure. It signed the documents of Save the Children Italy and currently refers to these when reporting and responding to suspected cases of maltreatment and abuse or breaches of the Code of Conduct occurring within the projects and activities in which it is a partner of Save the Children.

STAGE I

You must privately report your concerns, suspicions or certainties as soon as possible (by telephone, in person or in writing) to your line manager within the partner organisation (by the end of the same working day and in any case within 24 hours). Preferably use the Report Form (Appendix 3), which must in any case be filled in, even at a later date.
If the suspected perpetrator is your line manager, you must bring the matter to the attention of someone at a higher level to discuss the matter.
If, through circumstances beyond your control, this person cannot be reached within the specified timeframe, you may report the matter directly to another person listed in "**Key Contact Details**" (Appendix 2).

STAGE II

The person to whom you forwarded the complaint will confidentially inform the National Focal Point of Save the Children (immediately, i.e. by the end of the same working day and in any case within 24 hours).
This must also be done using the Report Form (Appendix 3) as soon as possible.

STAGE III

The National Focal Point of Save the Children will quickly, and never more than 24 hours later, assess the information received and together with the person who forwarded the complaint (or whoever is designated to do so by the partner) discuss how to proceed in relation to the Child Safeguarding Policy. The National Focal Point will then officially inform the Head of the Resources and Organisational Development Division and the Head of the Division of the Save the Children liaising with the partner of the complaint. Together with these persons and the person who received the complaint s/he will form a case management team (under the direction of the Head of the Resources and Organisational Development Division).

The case management team, after assessing the degree of urgency of the case and the most suitable timeframe, can decide to:

1. act on the basis of the information received, which has been reported in detail and assessed;

2. plan an internal inquiry, coordinated by the National Focal Point, with the sole aim of obtaining the necessary details or additional elements in order to be able to take any subsequent decisions in an informed way that is fair to everyone involved;

3. discuss and agree with the line manager of the subject of the complaint any eventual measures to be taken to lessen the risk to children who have been in contact with this person.

STAGE IV

Based on the information in their possession and depending on the seriousness of the case, the case management team could:

a) decide to mitigate or play down any concerns when, for example, following an initial assessment, important details are not confirmed;
b) decide to request disciplinary action against the subject of the complaint after first

communicating this decision to the Management of the partner organisation;

c) decide whether to refer the case to the judicial authorities, law enforcement agencies and social services (for the protection of the children involved); if they do, the team will convene a Crisis Unit, made up of the Management, the Head of Division of the subject of the complaint, the Head of the Human Resources Division, the National Focal Point and the representative of the Management of the partner organisation; the Crisis Unit may seek the opinions of one or more previously identified external experts.

The Crisis Unit is under the responsibility of the Management of Save the Children and will guide and support the partner organisation in:

- guaranteeing primarily the safety of the children and then of everyone else concerned, deciding on specific measures and a relevant action plan;
- discussing and determining how best to inform and involve the child's parents or guardian;
- drafting the report or complaint for the judicial authorities, checking its contents (also consulting external experts) and delivering it following the best practices eventually agreed upon with the institution to which it is addressed;
- determining to what extent the subject of the complaint's contacts with children should be restricted until the case is closed, taking into consideration any instructions received from the law enforcement agencies or judicial authorities, and finding the most appropriate ways of guaranteeing the protection of the children when doing this;
- deciding on an internal action plan to monitor the progress of the case (including a subdivision of roles, responsibilities and timeframes) and to close the case;
- confidentially informing the Head of the Communications Division, on a strictly "need to know" basis, in order to prepare an eventual communications strategy;

The Crisis Unit will inform the member of the Governing Board responsible for Child Safeguarding of the decision to make an official report or complaint against the member of staff or representative of the partner organisation of Save the Children.

In particularly serious cases or in cases of gross negligence on the part of the partner organisation to fulfil its obligations to protect children the Crisis Unit can decide to terminate the partnership and rescind the agreement.

STAGE V

All records and documentation will be stored securely by the National Focal Point for the duration of the case and shared, in the strictest confidence, only on a strictly "need to know" basis.

STAGE VI

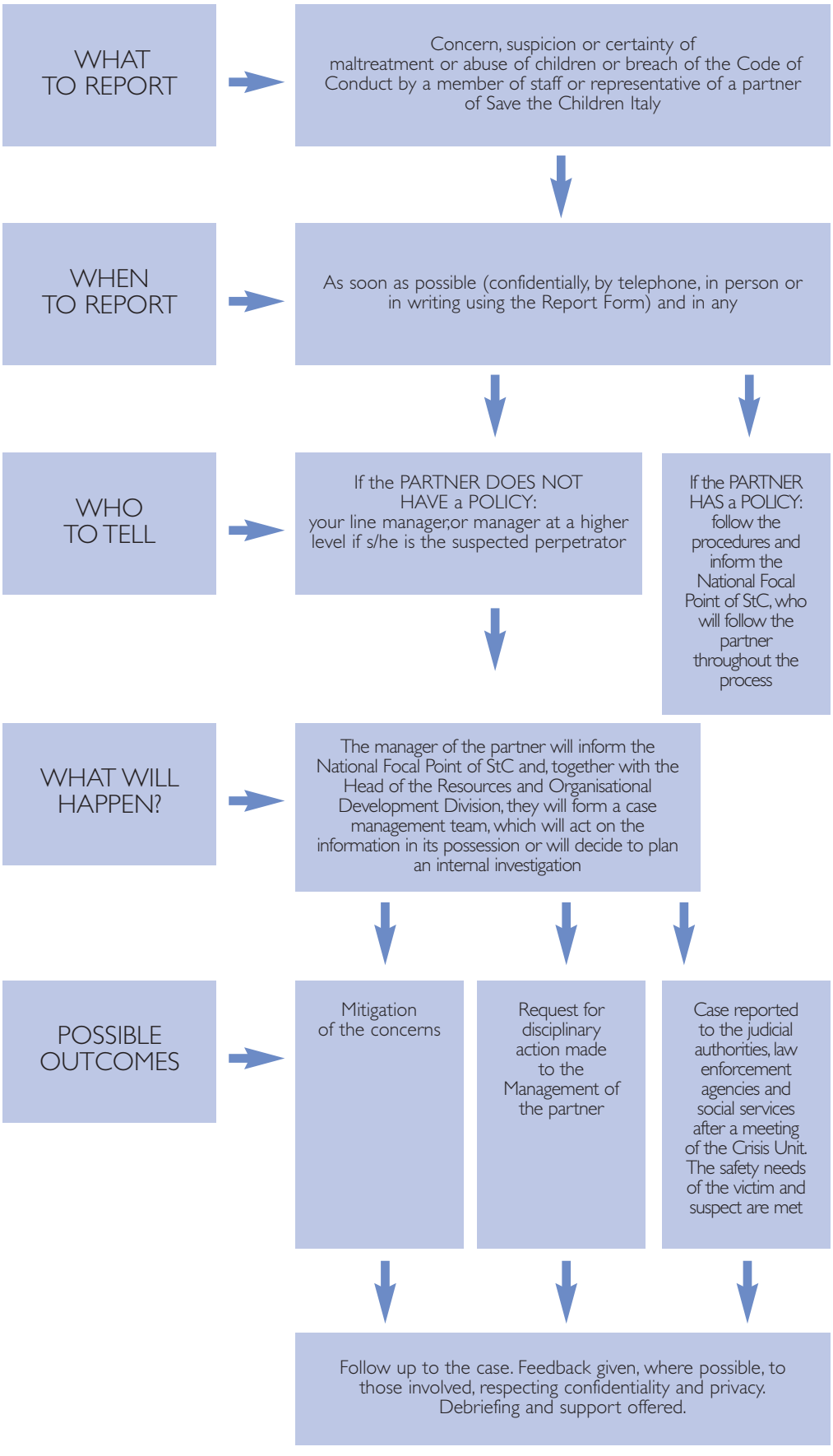
Adequate feedback and support will be provided for all those involved until the case has been closed.

STAGE VII

Registering of all complaints centrally and general anonymous information on the complaints sent to the Heads of Division and the representative of the Governing Board (on a six-monthly basis)

FLOW CHART - CASE 3

Suspected perpetrator: member of staff or representative of a partner
Whistle-blower: member of staff or representative of a partner



CASE 4	SUSPECTED PERPETRATOR	RECIPIENT OF COMPLAINT	WHISTLE-BLOWER
	Anyone (adulto o minore)	Member of staff of Save the Children (or partner organisation)	Child beneficiary of Save the Children (or partner organisation)

The Procedure in this specific case involves:

A PREPARATORY STAGE: consultation with children, using a participatory format, to work out and choose truly effective ways of presenting complaints and how they can be used.

A stage of RECEIVING AND RESPONDING TO A COMPLAINT by staff: once a complaint has been received and correctly dealt with, it will be assessed and handled in the same way as in the previous cases.

PREPARATORY

STEP 1

INFORM AND CONSULT THE CHILDREN AND THEIR REPRESENTATIVES

Inform the children and their representatives of their right to be protected, what is meant by abuse or maltreatment, how it can occur, the type of behaviour they can expect from the staff and representatives of Save the Children and other organisations[4].
Informative material on the topic is used, with different levels (for age groups 6-10, 11-13 and 14-18). This material, which contains general guidelines for reporting complaints, will be used to consult the children regarding the complaints procedures.
The staff involved will receive special training and a tool-kit to support them in this activity.

STEP 2

DEFINIRE CON I MINORI COSA SEGNALARE E COME FARLO

After establishing the most efficient ways of reporting according to our beneficiaries in the situations in which we operate, we must then agree with children on the kinds of complaints that can be made. Three areas will be indicated:

a) Concerns or queries relating to what we do and how we do it in the project or programme we are carrying out
Complaints here could refer to: the quality of the material we hand out, the way in which we carry out our activities etc.

a) The behaviour of staff and representatives of our organisation
Complaints about the behaviour of staff may indicate behaviour which breaches our Code of Conduct or the Policy.

c) The behaviour of members of the community (adults or children).
Complaints may concern inappropriate behaviour, maltreatment or abuse by members of the community (family members, friends, acquaintances or strangers the children come into contact with)

[4] The information sheet and the request for authorisation from the legal guardians of children attending the project/service run by Save the Children must always contain a specific reference to the existence of a Child Safeguarding Policy for child beneficiaries and a specific reference to the activities of the PREPARATORY PHASE in which the children will be involved.

STEP 3

RAISING AWARENESS AMONG ALL CHILDREN AND THE PEOPLE LOOKING AFTER THEM ABOUT WHAT THEY CAN REPORT AND HOW

After identifying and developing the methods, it is essential to inform all children (and the community) about the fact that they can make complaints, what they can complain about and how they can make complaints. Posters could be used and hung in places where the beneficiaries are likely to see them. Meetings mustbe organised to explain the contents of the posters, or community representatives/mediators and peer educators could be used to disseminate the messages.

STEP 4

CREATE AND INTRODUCE THE METHODS IDENTIFIED TO RECEIVE AND RESPOND TO COMPLAINTS WITHIN SERVICES, COMMUNITIES OR OTHER CONTEXTS IN WHICH SAVE THE CHILDREN OR ONE OF ITS PARTNERS OPERATES

Generally speaking the system for receiving complaints from child beneficiaries includes: direct conversations with one of various contacts (family members, the project contacts, other operators on the project) and a box for written messages or drawings, which may also be anonymous[5]. If different methods from those proposed prove more effective during the consultation stage (for example, opening a specific e-mail address, creating specific hot lines, holding frequent formal/informal group meetings, using peer educators etc), the material and methods must be changed by the project contacts, but only with the support of the National Focal Point or under her/his supervision.

STEP 5

STAFF TRAINING

All staff will be trained to use the methods identified.

RECEIVING AND DEALING WITH COMPLAINTS

STAGE I

The complaints mechanism is organised in such a way that the project manager will receive the complaint in as short a time as possible (if not directly).

STAGE II

The project manager will make an initial assessment of the situation. If the complaint (message, drawing, story etc) falls under the Safeguarding Policy, s/he will forward the complaint to the National Focal Point (if possible in writing using the Report Form) as soon as possible and in any case within 24 hours.

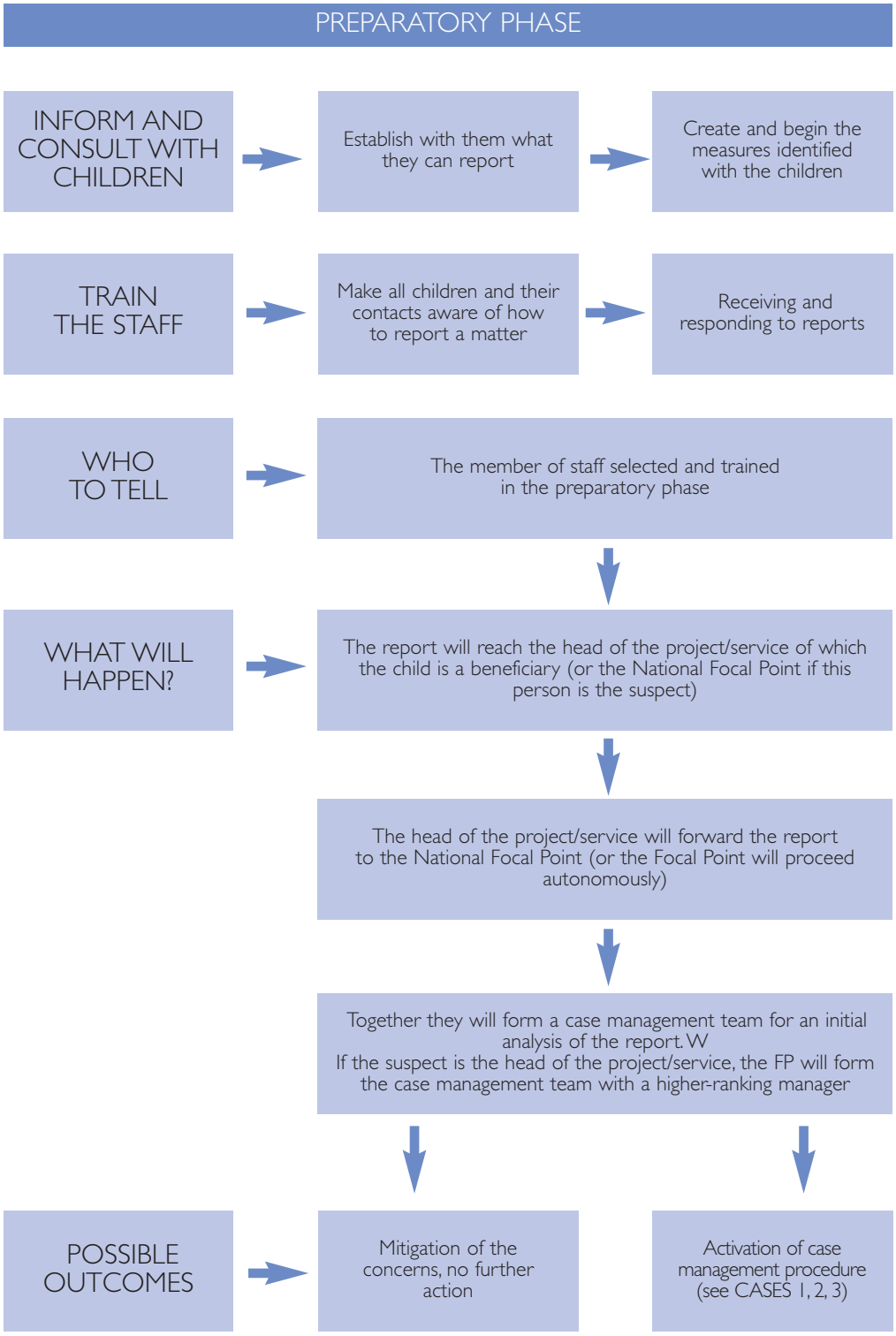
STAGE III

The manager and the National Focal Point will set up a case management team to assess the complaint. Then, as soon as possible and in any case within 24 hours, s/he will decide whether to:
1) mitigate or play down concerns (because, for example, there is clear evidence that the complaint is unfounded);
2) respond to the complaint in accordance with the specific case (the suspected perpetrator is from within Save the Children or a representative, the suspected perpetrator is an adult from outside the organisation, the suspected perpetrator is a child, the suspected perpetrator is a member of staff or representative of a partner organisation).

[5] At the end of every working day the box will be opened by the local project manager together with one operator. Consequently, the possible warning procedure will be activated.

FLOW CHART - CASE 4

The suspected abuser can be anyone, the whistle-blower was a child beneficiary: creation and use of inclusive child-friendly reporting procedures for child beneficiaries



CASE 5	SUSPECTED PERPETRATOR	WHISTLE-BLOWER
	Child (whether beneficiary or ot of Save the Children or one of its partners)	Member of staff or representative of Save the Children, member of staff or representative of a partner, or visitor

PREMISE

It is compulsory to report centrally, though not exclusively, every situation staff of Save the Children or a partner (or one of their representatives or a visitor) come across during their work that might involve a criminal offence or a situation of danger for a child when another child is the presumed perpetrator.
The organisation guarantees in all cases suitable protection and a suitable handling of the case for all the children involved, whether suspected perpetrators or victims.

STAGE I

You must privately report your suspicion or certainty as soon as possible (by telephone, in person or in writing) to your line manager (by the end of the same working day and in any case within 24 hours). Preferably use the Report Form (Appendix 3), which must in any case be filled in, even at a later date.
If, through circumstances beyond your control, this person cannot be reached within the specified timeframe, you may report the matter directly to another person listed in "**Key Contact Details**" (Appendix 2)

STAGE II

The person who received the complaint will carry out an initial assessment and then forward the complaint (by mail or fax) with the utmost urgency (and in any case always within 24 hours) to the National Focal Point and her/his direct Head of Unit/Department and/or Head of Division, providing an assessment of the degree of urgency.

STAGE III

The Head of Division will convene a meeting with the National Focal Point and the person who forwarded the complaint (the case management team) at a time dictated by the degree of urgency

STAGE IV

The case management team will study the information they have received. They may decide to call upon other individuals from within the organisation who are considered useful in achieving a better assessment and handling of the case (firstly staff from the Policy and Law Unit and the Protection Unit, and then other internal experts). Furthermore, they may already decide at this stage to hear other opinions or consult external experts on the matter, from both public institutions and third-sector bodies with whom the organisation has framework partnership agreements.
Once the persons who can help achieve a better assessment and handling of the case have been identified, they will together form the Suspected Abuse Rapid Response Team *(TRRSA).*

STAGE V

Mandate of the *Response Team*:
Guarantee the safety of the child victim and the child suspected of abuse, using every necessary means. Assess how serious the situation is and confirm the degree of urgency. Try and understand what has happened. Decide whether any further action needs to be taken to better understand what has happened, determining who should do what. Listen to and consider every useful opinion of other people who are legitimately involved (for example the

parents/guardians of the children, contacts in the social services who know the children etc). Take a final decision. Draw up an action plan to close the case, with timeframes, roles and responsibilities.

The Head of Division involved is in charge of the *Response Team.*

The coordinating and supervising of the action plan are the responsibility of the National Focal Point.

After establishing the degree of urgency and timeframe, the *Response Team* can decide to:

1) act on the basis of the information received, which has been reported in detail and assessed;
2) plan an external inquiry, coordinated by the National Focal Point, with the sole aim of obtaining the necessary details or additional elements in order to be able to take any subsequent decisions in an informed way that is fair to everyone involved;

In both cases it will proceed to:

guarantee the immediate involvement of the parents or guardian of the child suspected of abuse and of the child victim, unless this is not in their best interests;

discuss and reach an agreement with the Head of Division on eventual measures to lessen the risk to and protect children who have been the subject of a complaint (including the suspected perpetrator);

seek, at any stage during the assessment, the opinions of one or more previously identified external experts (from the public sector or third sector).

STAGE VI

The *Response Team* will reach a decision based on the information already in its possession or after an external investigation. When deciding on how to proceed, special consideration will be given to the age of the young abuser (as s/he may also be charged with a criminal offence)[6], the seriousness of the case and whether the child is in the care of the social services or has been punished by the juvenile court.

In cases where children are the abusers, it is fundamental to reach decisions together with external experts (from the public sector or third sector).

The *Response Team* can:

a) decide to mitigate or play down any concerns when, following an initial assessment, important details are not confirmed;

b) consider reporting the young abuser to the social services (to protect all the children involved, and prevent further abuse and provide support without involving the judicial authorities);

[6] Generally speaking the Criminal Code presumes that an adult is capable of consent. However, Article 98 states that imputabiliy must be determined in each individual case for "children who were over 14 years of age, but not yet 18 when the acts took place", while children under the age of 14 cannot be charged. In short, under Italian law, in order to press charges against a child under the age of 18, s/he must not be under 14 and the imputability must be determined in each separate case, deciding whether the person can be held responsible for the crime committed and therefore tried in a court of law.

c) decide whether to report the young abuser not only to the social services, but also to the public prosecutor of the juvenile court or the law enforcement agencies; this decision must first be approved by the Management and carried out adopting the best practices for the safeguarding of the accused child..

STAGE VII

All records and documentation will be stored securely by the National Focal Point for the duration of the case and shared, in the strictest confidence, only on a strictly "need to know" basis.

STAGE VIII

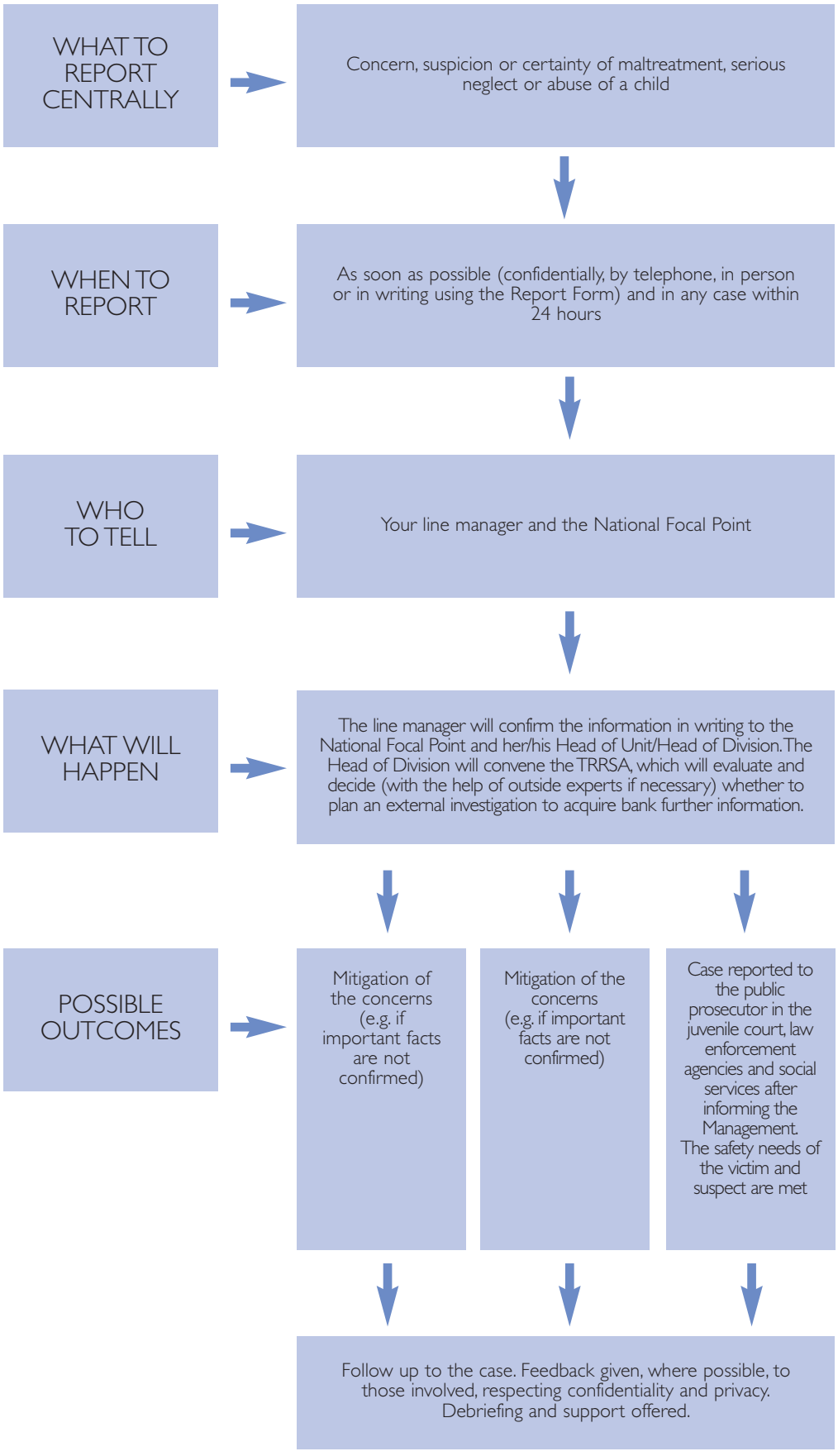
Adequate feedback and support will be provided for all those involved until the case has been closed.

STAGE IX

Registering of all complaints centrally and general anonymous information on the complaints sent to the Heads of Division and the representative of the Governing Board (on a six-monthly basis)

FLOW CHART- CASE 5

Suspected abuser: child beneficiary of Save the Children or external child
Whistle-blower: staff or representative of Save the Children or partner, a child beneficiary or visitor



7.
APPENDICES

I. Acceptance of the Policy, Code of Conduct and Procedure by the staff and representatives Save the Children and its partner oranisations

(Declaration of Acceptance – Appendix 1)

The staff of Save the Children and its representatives or visitors must accept the Policy and adhere to the Code of Conduct and Procedure. So must the staff of partner organisations and their representatives.

II. Definition of the Key Contact Details for the staff of Save the Children

(Key Contact Details - Appendix 2)

III. Registering a report

To be used by both the staff of Save the Children and the staff of partner organisations or ther representatives

(Report Form – Appendix 3)

IV. Self-declaration regarding offences involving minors

(Self-certification- Appendix 4)

APPENDIX I - GENERAL PROCEDURE

Declaration of acceptance

I confirm that I have received and read, and, therefore, AGREED TO SIGN for the entire duration of my collaboration with Save the Children Italy (or participation in the activities of Save the Children Italy or in activities carried out by one of its partner organisations):

- *the Child Safeguarding Policy and the Code of Conduct (April 2013);*
- *the General Procedure for Child Safeguarding (April 2013).*

I also acknowledge that the contents of those documents may be added to or altered at any time at its absolute discretion by Save the Children Italy. To this effect I declare and warrant to accept as of now unconditionally any such changes and additions and to add here to them.

Should I fail to do so, I acknowledge and accept that Save the Children Italy may terminate what ever relationship they have with me, without warning or discussion.

Name and Surname: .....

Position[7] held and project/activity[8]: .....

.....

.....

City: .....

Legible signature: .....

Date: .....

[7] Please state whether you are an employee, collaborator, adviser, volunteer, representative or trainee.
[8] Please state the name of the project (e.g. "Fuoriclasse Project" – School and Education Unit) or area of activity (e.g. marketing, fundraising, Communication-campaign EveryOne etc) and any eventual partner organisation that is carrying out the project or activity for Save the Children Italy.

APPENDIX 2 - GENERAL PROCEDURE

Key Contact Details

Name:

Surname:

Organisation:

Position:

Eventual project:

Place of work:

Line manager:

Line manager:

Line manager:

Name

Surname:

Position:

Tel:

E-mail:

Place of work:

SAVE THE CHILDREN ITALY

Child Safeguarding Policy manager

(acting as National Focal Point for Child Safeguarding)

Incaricata Nazionale

Laura Lagi

Contact details

Office 06. 48070002
Cell. 345. 9544926
e-mail laura.lagi@savethechildren.it

Next level manager:

Name

Surname:

Position:

Tel:

E-mail:

Place of work:

SAVE THE CHILDREN ITALY

Head of the Resources and Organisational Development Division

(acting as National Child Safeguarding Manager)

Incaricata Nazionale

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APPENDIX 3 - GENERAL PROCEDURE

Report Form

CONFIDENTIAL

Programme/Place:

Name and Surname of the child:

Details of the report:

Date: Times:

Place:

Details of the person making the report:

Name and surname:

Address:

Main telephone no.:

Secondary telephone no.:

Occupation:

Relationship to the child:

Details of the child:

Details of the child:

Name and surname:

Age:

Date of Birth:

Gender:

Address:

Reception facilities:

School:

Class: Teacher:

Nationality:

Language spoken:

Religion:

Disability (if "yes" please provide details):

Identity card no.:

Person responsible/guardian:

Recent changes in the child's behaviour:

Details of the alleged abuse: who, what, where and when
(include the testimony of the victim if possible)

Details of the suspected perpetrator (if known):

Name and Surname:

Address:

Age:

Date of birth:

Occupation:

Type of work:

Relationship to the child:

Presumed current whereabouts
of the suspect:

Present safety of the child (include information regarding whether the place in which s/he is staying is safe, whether there are risks of any kind, whether s/he has expressed any fears that should be considered etc)

Was emergency medical treatment requested for the child?

If "yes" , please indicate who the request was made to (service, names of staff and contact details) and whethertreatment has already been given (where, which service, names of staff and contact details):

.....

Who else knows about the case?

Agency, body, organisation or other:

.....

Member of the family or others (please specify):

.....

Action taken so far *(e.g. case reported to the judicial authorities, the social services, other. Please specify place and date, action taken, persons involved and their contact details)*

Complaint details provided by:
(if it is the same person who made the complaint, there is no need to fill in this box)

Name:

Role and place:

Date:

Signature:

THIS SECTION IS TO BE FILLED IN BY THE LINE MANAGER
WHO RECEIVED THE REPORT

Name:

Position:

Place:

Date and time report received:

Action taken by the line manager:

Is there any connection between the alleged abuser and Save the Children or its partners?

1 hould the case be dealt with using external procedures, in other words, is there any connection between the case and Save the Children Italy or a partner? (Yes/No and please specify):

2 Should the case be dealt with using internal procedures (Yes/No and please specify):

Are any eventual decisions already taken by the line manager in line with the Policy and relative Procedure for Child Safeguarding? (please supply details)

Were the judicial authorities involved? (Yes/No, please specify why)

Were public authorities for the protection of children involved?
(Yes/No, please specify why)

What other action was taken to ensure the safety of the child?

Was medical treatment requested?

Date and time the child was sent for/received medical treatment:

Signature of the line manager

APPENDIX 4 - GENERAL PROCEDURE

Self-declaration

Given that:

1. The candidates that Save the Children Italy ONLUS looks for and selects, directly or through its partners, for any kind of positions/qualification may be involved in direct contact with children, either individually or in groups, in one-to-one contacts without any kind of supervision, or in the management of programmes which involve direct support for children;
2. it is indispensable that candidates have irreproachable conduct, in particular in their relations with children as required by Save the Children Italy's Child Safeguarding Policy.

The undersigned ..... born in .....

on ..... Fiscal Code .....

resident in .....

identity document ..... n. .....

issued by ..... issue date .....

as:

❑ employee or: ❑ collaborator ❑ volunteer ❑ trainee

of Save the Children Italy ONLUS or a partner organisation carrying out a project/activity for Save the Children Italy ONLUS in the project/activity:

.....

fully aware of the importance of the information I provide in this document to Save the Children Italy ONLUS and of the legal consequences, both civil and criminal, I may face if I provide false information or make wilful omissions in accordance with Art. 76 DPR 445/2000 or Art. 640 of the Criminal Code, and that any such false information or wilful omissions are in themselves just cause to terminate the contract in accordance with Art. 2119 of the Civil Code in the most serious cases,

DECLARE AND WARRANT
under my own responsibility
with specific reference to offences involving minors

1. that I do not have any criminal proceedings pending
2. that I have never been found guilty of a criminal offences, even if it was not enforced (because of a pardon, amnesty, remission of the penalty or judicial pardon)
3. that I am not aware of any criminal investigations in which I am involved
4. that I have never been charged with or under investigation for any offence, including judgements that were not enforced or offences that came under the statute of limitations

Moreover, I **will immediately inform** Save the Children Italy if **any change whatsoever** occurs with regards to the above declarations.

Place and date .....

Legible signature of the person making the self-declaration .....

Save the Children is the largest independent international organisation working to improve the lives of children in Italy and throughout the world. Set up in 1919, it operates in 119 countries to guarantee all children health, protection, education, economic development and food safety, and to promote the involvement of all children. Moreover, it responds to emergencies caused by conflicts or natural disasters.

Save the Children was set up as a non-profit organisation in Italy at the end of 1998 and began operating in 1999. It is now an NGO recognised by the Ministry of Foreign Affairs. For more than 10 years it has been working in Italy to protect children, especially migrant children; to teach children how to use new technologies and fight child pornography online; to promote the rights of the child and combat poverty, dropping out of school and social exclusion. Moreover, it responds rapidly to emergencies, supporting children and their families.

Save the Children
Italia ONLUS

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