

Child Safeguarding Policy (*Politica di Tutela dei Minori*)

- Approval: July 2026
- Document owner: **Dr Raffaella Ferreri**, Designated Safeguarding Lead (DSL)

1. INTRODUCTION

THE QUBE ETS APS pursues civic aims and social benefit, delivering education and training (including vocational training), cultural initiatives and research activities of social interest. The Qube promotes community-based local engagement and youth participation, pre-incubation pathways and entrepreneurship education, workshops and training on soft/life skills and work-readiness (in schools, at our premises and in partner venues), business training and mentorship programmes (business model, marketing, accounting/finance), support for business plans and pitching, networking and connections to partners/investors, as well as events (conferences/talks/fairs) and communication and media-crossing activities. Activities may also be delivered online and in collaboration with public and private bodies.

The Qube recognises that when children and adolescents (hereinafter “children” or “minors”) take part in activities, they may be exposed to risks of discrimination, violence and abuse even within initiatives designed for their benefit—especially where relationships involve responsibility, trust or power.

For this reason, The Qube is committed to activating appropriate safeguarding measures whenever it works for or with children, ensuring safety, respect and protection from all forms of harm. Safeguarding is a shared responsibility: everyone involved in the Association’s activities contributes to creating environments that are safe, inclusive and consistent with children’s rights.

2. PURPOSE AND SCOPE

This Policy sets out mandatory commitments, rules and procedures to prevent and respond to risks of harm to children involved in The Qube's activities.

This Policy applies to:

- employees, staff, collaborators and consultants;
- volunteers, interns and members when acting on behalf of The Qube;
- trainers, mentors, coaches, speakers, photographers/videographers;
- partners and suppliers who have contact with children during The Qube activities.

This Policy is made public (via the website and official channels) and is communicated in an accessible form to children and families before or at the start of activities.

3. GLOSSARY

- **Child / minor / adolescent:** any person under 18 years of age.
- **Safeguarding:** the set of measures to prevent harm, promote wellbeing and ensure safe environments.
- **Abuse:** any act or omission that causes harm to a child, including:
 - physical abuse, emotional/psychological abuse, sexual abuse, neglect;
 - exploitation (including economic exploitation or "exchange of favours");
 - bullying/cyberbullying, harassment, stalking, grooming;
 - discrimination and hate speech;
 - exposure to inappropriate online content and privacy violations.
- **Concern / report:** any information, suspicion, observation or disclosure indicating risk or harm.
- **DSL (Designated Safeguarding Lead):** the formally appointed Safeguarding Lead.

4. CONTEXT-SPECIFIC RISKS

Within our activities (workshops, mentoring, events, visits, training in schools or at our premises, and online activities), key risks may include:

1. **Inappropriate adult-child contact** (physical, verbal or relational).
2. **Unsupervised 1:1** interactions (mentoring, meetings, guidance).
3. **Inappropriate digital communications** (private chats, social media, messages outside official channels).
4. **Collection/management of personal data and images** without adequate safeguards or consent.
5. Peer-on-peer **bullying, discrimination and harassment** during group activities.
6. **Logistical risks** (travel/movements, sign-in/sign-out, venue safety, events).
7. **Partnerships and suppliers not aligned** with safeguarding standards.
8. **Increased vulnerability:** children with disabilities, migrant backgrounds, prior trauma, socio-economic hardship, specific communication needs.

5. OUR COMMITMENT

The Qube firmly believes that:

- every child has the right to safety, dignity, being heard and being respected;
- safeguarding is everyone's responsibility, without exception;
- effective prevention and response require clear rules, training, organisational culture and accountability.

The Qube gives equal priority to the safety of all children, regardless of age, disability, gender identity, origin, nationality, language, religion or belief, sex, sexual orientation, socio-economic status or any other characteristic.



The Qube also recognises that some children may be at increased risk and is committed to adopting additional protection and accessibility measures where needed.

6. GOVERNANCE AND RESPONSIBILITIES

The Qube formally appoints in writing:

- **Designated Safeguarding Lead (DSL): Dr Raffaella Ferreri** — Co-Founder, Pre-Seed Acceleration Manager — raffaella@theqube.it — + 39 328 837 6769
- **Board Safeguarding Contact: Dr Vanessa Coppola** — Legal Representative, Head of Innovation & Corporate Venturing — vanessa@theqube.it — + 39 39 117 153 89

Minimum responsibilities

- The Board ensures resourcing, approval, oversight and review of this Policy.
- The DSL manages reports, records, training, audits and liaison with external systems.
- All staff/volunteers/collaborators must: know this Policy, sign the Code of Conduct, participate in training, and report any concern or incident.

7. CODE OF CONDUCT

All adults acting on behalf of The Qube must:

- treat every child with respect, listen to them and use age-appropriate language;
- maintain clear professional boundaries;
- always use official and transparent channels (email/project tools) for communications;
- work, wherever possible, in visible settings, with supervision or an “open door” approach;
- intervene and report bullying, discrimination and risky behaviours;
- protect children’s data and images in line with procedures.

IT IS PROHIBITED to:

- engage in any form of abuse or unnecessary/invasive physical contact;
- use sexualised, suggestive, humiliating, threatening or discriminatory language;
- meet a child alone in unauthorised places or without transparency safeguards;
- communicate with children through personal accounts, private chats, social DMs or private phone numbers, except under DSL-authorised protocols and always with traceability;
- request/accept favours, inappropriate gifts or any kind of exchange;
- use children's images or information without consent and without a legitimate purpose;
- consume alcohol or substances during activities with children or attend while impaired;
- transport children in a private car without written authorisations and defined procedures;
- record audio/video of children without notice and consent.

Breaches of the Code of Conduct are managed as safeguarding concerns and may result in immediate suspension, removal from activities and reporting to the competent authorities.

8. SAFER RECRUITMENT

The Qube applies safe selection and engagement procedures for any role with potential contact with children. Before starting any activity involving children, The Qube:

1. defines the role and duties;
2. verifies identity and CV;
3. conducts an interview including specific questions on ethics and safeguarding;
4. obtains at least two references (where applicable);
5. carries out suitability checks and controls where required by law or the risk assessment (e.g., certificates/criminal record checks or equivalent);
6. requires signature of the Code of Conduct and acknowledgment of this Policy;
7. provides initial shadowing/supervision and a probationary period (for ongoing roles).

No person may begin work involving contact with children without completing the minimum steps above, except where the DSL authorises a justified exception with documented compensating measures (e.g., continuous supervision).

9. DATA PROTECTION

The Qube processes children's data in line with the principles of minimisation, purpose limitation, security, storage limitation and confidentiality.

Minimum rules

- collect only necessary data;
- provide clear privacy information to families/children and obtain consent where required;
- store data and consents on authorised organisational systems with restricted access;
- prohibit storage on unauthorised personal devices;
- photos/videos may be taken and used only with explicit consent, a lawful purpose and clear publication rules (no unnecessary identifying data; preference for group/non-identifiable images where possible);
- in the event of a data breach involving children's data, The Qube activates its internal incident response procedure immediately and, where necessary, completes any notifications required by law.

10. MANAGING SAFEGUARDING REPORTS

Anyone (children, families, staff, partners) must be able to report concerns easily and safely.

INTERNAL REPORTING CHANNELS

- **Designated Safeguarding Lead (DSL): Dr Raffaella Ferreri** — Co-Founder, Pre-Seed Acceleration Manager — raffaella@theqube.it — + 39 328 837 6769
- **Board Safeguarding Contact: Dr Vanessa Coppola** — Legal Representative; Head of Innovation & Corporate Venturing — vanessa@theqube.it — + 39 39 117 153 89

Mandatory principles

- every concern must be taken seriously;
- the child's safety takes priority over reputation or organisational interests;
- confidentiality: information is shared strictly on a "need-to-know" basis;
- no retaliation: good-faith reporters are protected;
- recording: every report must be documented with date/time/facts.

Operational internal decision protocol

Scenario	Actions to take
Immediate danger or medical emergency	▪ Call 112; ▪ immediately ensure the child is safe; ▪ inform the DSL as soon as possible; ▪ complete the report form (Appendix A).
Disclosure of abuse or strong indicators of abuse/neglect	▪ Do not investigate; do not promise secrecy; listen and reassure the child; ▪ inform the DSL immediately. ▪ The DSL assesses referral to appropriate services/authorities (social services, law enforcement) based on the risk threshold.
Medium/low risk (e.g., bullying, inappropriate behaviour, online risks)	▪ Record the incident; ▪ inform the DSL; ▪ define protective measures (supervision, activity adjustments, support); ▪ inform family and school when appropriate and safe.
Report concerning a staff member or volunteer	▪ Inform the DSL and the Board Safeguarding Contact immediately; ▪ suspend from child-related activities as a precaution if necessary; ▪ initiate disciplinary procedures and assess any external reporting obligations.

The Qube does not conduct investigations that substitute those of the competent authorities; it is committed to gathering essential facts, protecting the child and activating the appropriate channels.

EXTERNAL REPORTING CHANNELS

Where necessary, the DSL activates appropriate external systems, in coordination with partners (e.g., schools) and in compliance with the law:

- Emergency services: 112
- Local municipal Social Services
- Law enforcement (Police/Carabinieri) where a criminal offence may be involved
- Judicial authorities/Prosecutor's Office via appropriate channels (where applicable)

11.COMPLAINTS

Children and families must be able to submit complaints regarding conduct, quality and safety of activities.

- complaints must be recorded;
- the DSL assesses whether a complaint raises a safeguarding issue;
- The Qube provides feedback within reasonable timeframes and indicates escalation routes (Board Safeguarding Contact, external systems).

12. CONCLUSION

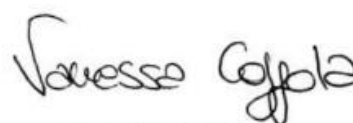
This document represents a public commitment by The Qube ETS APS. Everyone acting on behalf of the Association must comply with it and actively contribute to creating environments that are safe, inclusive and respectful. The document is published online and is subject to periodic review; any questions or reports must be addressed to the Designated Safeguarding Lead (DSL) using the contacts provided.

Lecce, 30 July 2026

Designated Safeguarding Lead (DSL): **Dr Raffaella Ferreri**



Board Safeguarding Contact and Legal Representative: **Dr Vanessa Coppola**



Appendix A — Safeguarding Report Form (template)

1. REPORTER DETAILS

(complete if the report is not anonymous)

Full name: _____

Role/Function: _____

Contact details (email and/or phone): _____

Date and time of report: _____

2. CHILD DETAILS

(if known and relevant to the report)

Full name / initials: _____

Age and class/year group: _____

Context of the incident (school / premises / activity / online):

3. DESCRIPTION OF FACTS

(record only what was observed or reported, avoiding interpretations or judgement)

Description of what happened / child's statements:

Location and date/time of the incident:

People present or involved:

Immediate actions taken:

4. URGENCY ASSESSMENT

Immediate danger to the child: ☐ Yes ☐ No

Need to contact 112 or external services: ☐ Yes ☐ No

5. REPORT RECIPIENT

Report sent to: ☐ DSL ☐ Board Contact

Date and time sent: _____

Appendix B — Legal framework and reference standards

The Qube ETS operates in full compliance with applicable law and with international and European standards relating to children's and adolescents' rights, safeguarding and protection, the prevention of all forms of abuse, exploitation and neglect, as well as personal data protection.

This Policy is inspired by the principles of child-centred practice, prevention, proportionality, timely action and organisational responsibility, and aligns with public protection systems and competent authorities.

The list below is non-exhaustive and may be updated during periodic reviews of this Policy or following legislative changes.

International framework

- **United Nations Convention on the Rights of the Child (CRC, 1989), ratified by Italy with Law No. 176/1991**, recognising children as rights-holders and establishing the best interests of the child as a guiding principle for all action.
- **Optional Protocol to the CRC** on the sale of children, child prostitution and child pornography.

European framework

- **Charter of Fundamental Rights of the European Union, Article 24 – The rights of the child**, affirming the right to protection and care necessary for a child's wellbeing and the principle of the child's best interests.
- **Regulation (EU) 2016/679 (GDPR) on personal data protection**, with specific reference to children's data and security/confidentiality measures.
- **Directive 2011/93/EU of the European Parliament and of the Council** on combating the sexual abuse and sexual exploitation of children and child pornography.
- **Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse (the Lanzarote Convention – CETS No. 201), ratified by Italy with Law No. 172/2012.**

National framework (Italy)

- **Legislative Decree 3 July 2017, No. 117 – Third Sector Code**, referencing principles of responsibility, transparency and safeguarding of beneficiaries of activities, with particular attention to vulnerable persons.



- **Legislative Decree 30 June 2003, No. 196 – Italian Data Protection Code, as amended by Legislative Decree 101/2018**, aligned with the GDPR.
- **Law 29 May 2017, No. 71**, setting out measures to protect minors for the prevention and contrast of cyberbullying.
- **Relevant Italian criminal and civil provisions on child protection**, including offences against the person and reporting obligations, as well as public protection systems (local social services, judicial authorities and law enforcement), activated in accordance with the procedures set out in this Policy.