

Please note: The CCP is published on the websites of the respective partnership associations and on <https://citizens4climate.eu/deliverables/> under the label “child protection policy”.

Child Protection Policy – Le Partenariat

Le Partenariat is fully committed to safeguarding the welfare of all children in its care. It recognises the responsibility to promote safe practice and to protect children from harm, abuse and exploitation. For the purposes of this policy and associated procedures a child is recognised as someone under the age of 18 years.

Staff and volunteers will work together to embrace difference and diversity and respect the rights of children and young people.

This document outlines **Le Partenariat** commitment to protecting children.

These guidelines are based on the following principles:

- The welfare of children is the primary concern.
- All children, whatever their age, culture, disability, gender, language, racial origin, socio-economic status, religious belief and/or sexual identity have the right to protection from all forms of harm and abuse.
- Child protection is everyone's responsibility.
- Children have the right to express views on all matters which affect them, should they wish to do so.
- Organisations shall work in partnership together with children and parents/carers to promote the welfare, health and development of children.

Le Partenariat will:

- Promote the health and welfare of children by providing opportunities for them to take part in activities safely.
- Respect and promote the rights, wishes and feelings of children.
- Promote and implement appropriate procedures to safeguard the well-being of children and protect them from abuse.
- Recruit, train, support and supervise its staff, members and volunteers to adopt best practice to safeguard and protect children from abuse and to reduce risk to themselves.
- Require staff, members and volunteers to adopt and abide by this Child Protection Policy and these procedures.
- Respond to any allegations of misconduct or abuse of children in line with this Policy and these procedures as well as implementing, where appropriate, the relevant disciplinary and appeals procedures.
- Observe guidelines issued by local Child Protection Committees for the protection of children.
- Regularly monitor and evaluate the implementation of this Policy and these procedures.

Any issue related to child protection should be communicated to Amandine Bourdon, Child Protection Officer for Le Partenariat, at gaia.ead@gmail.com.

Review

This Policy and these Procedures will be regularly reviewed:

- In accordance with changes in legislation and guidance on the protection of children or following any changes within Le Partenariat.
- Following any issues or concerns raised about the protection of children within Le Partenariat.
- In all other circumstances, at least every three years.

CHILD AND VULNERABLE ADULT PROTECTION POLICY

DEFINITIONS:

- child: according to UNCRC, any person under the age of 18. For this reason, by child we mean any human being born, alive and who has not yet reached the age of 18 years.
- adult: every human being who has reached the age of 18 years
- vulnerable adults: individuals aged 18 years and over who are at greater risk of significant harm due to factors such as gender, age, mental or physical health, or as a result of poverty, inequality or experience of displacement or crisis.
- family: any type of union that assumes cohabitation and living together, and where both children and adults are involved
- rights of children: all the rules established for the protection of children by the Convention on the rights of the child (UNCRC-1989) and optional protocols
- violence: we intend any behaviour which is not accidental, at the hands of parents, tutors, other adults, adolescents, or children, and which may produce a real or a potential risk to health, growth, or the dignity of the child or the adolescent.

CIFA ETS shares the definitions of physical ill-treatment, sexual abuse, psychological ill-treatment, carelessness or negligence, and exploitation, as elaborated by the International Agencies of the United Nations, and recognized by other organizations dealing with child protection.

-Infantile ill-treatment: any act deliberately carried out by a parent or a subject in a position of power, responsibility or trust, in the case of a child or a boy/girl, and that may cause damage potentially, or really, to their security, their well-being, their dignity or their development. It



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includes all forms of prejudice, physical or psychological, brought about by an abuse of power, or by the betrayal of a child's trust on the part of an adult.

-Physical ill-treatment: any conduct that causes physical damage, real or potential, to a child or an adolescent, at the hands of an adult or a compeer.

-Psychological ill-treatment: a conduct repeated in time that jeopardizes the affective, cognitive and social development of a child or an adolescent, and its perception of him/herself. It may take different forms, and is often accompanied by other types of ill-treatment.

-Sexual abuse: the involvement of a child - incapable through age or psychic problems, or by any other means, even temporarily - in sexual activity with or without physical contact, on the part of an adult or a compeer.

-negligence: the inadequate attention paid to emotional or material needs of a child on the part of parents, or those whose duty it is to take care of them. It includes the incapacity to protect the child or the adolescent from potential perils, or to guarantee and care for primary needs such as medical attention, education, and an adequate development of emotional growth, often to the point of exposing the child to physical or emotional disability.

Exploitation: use a boy or a girl for the advantage, not necessarily economic or financial, of third persons. Such activities expose the child to an unjust treatment, cruel and dangerous and are thus prejudicial to his/her emotional, social and moral development, and also to the psycho-physical health of the victim.

Herewith included are:

- sexual exploitation: includes any activity in which a subject takes advantage of his/her position in relation to the child for sexual activities and for the gain of economic, social or political profit. The child could become exploited both as a sexual object and as a

commercial object.

- economic exploitation of children: the engagement of a child in illegal form of labour activities particularly risky, so much so as to compromise his psycho-physical well-being, and to jeopardize his right to education, health and family life. Economic exploitation implies the obtaining of profits for the production, the distribution and the consumption of goods and services which produce an impact on the economy of a determinate entity, be it the State, the community, or the family.

TO WHOM DOES THE CHILD AND VULNERABLE ADULT POLICY APPLY

CIFA ETS, by its proper functions and nature, undertakes to guarantee to every child and vulnerable adult a secure environment within the definition of the policies and procedures of protection.

The Policy is to be considered binding for all the staff, the volunteers, the Members of the Board of Directors, and everybody who holds a job or a task even on a temporary basis, on behalf of CIFA ETS.

CIFA ETS undertakes to issue guidelines which are clear and precise, and also to provide training for its staff, and for all volunteers and Members of the Board of Directors, on themes relating to ill-treatment, exploitation, and abuse of children, on the possible risks, and the means of their prevention, and not least the behaviour to be followed, and the boundaries and limits within which they may operate, when they are in contact with children.

The above seeks to reduce the risk of potential damage, and contributes to the creation of an environment that is respectful, safe, and also calculated to be "on the scale of the children themselves." The staff, the volunteers and the Members of the Board of Directors are all expected to follow this Policy, and in particular the Code of Behavior of the CIFA ETS.

WITH WHOM IS THE POLICY SHARED?



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The children, the boys, the girls and vulnerable adults who are involved in the activities of CIFA ETS, take part in the revision and the re-elaboration of the Policy. The Policy will be shared with all the boys and girls who are the receivers and beneficiaries of the CIFA ETS operations/interventions, in a form that is made to be comprehensible for them.

1. Boys and girls and vulnerable adults must see that their right to a hearing of their ideas and opinions is guaranteed;
2. Boys and girls and vulnerable adults may always call attention to negative or unacceptable behaviors which they have witnessed.
3. Boys and girls must be placed in a position to assume an active role in the protection of themselves and of their companions and compeers.

In order that CIFA ETS may function as an organization that is safe for boys and girls and vulnerable adults, it is necessary for everyone who forms a part of it to have the desire and the willingness to observe the policy in all its details.



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The families, too, must be involved in the final audit, and the Policy must be shared in a way that is comprehensible to them.

CIFA ETS hopes that any organizations with whom they collaborate will accept the responsibility to reduce to the minimum all risks of ill-treatment, exploitation or abuse in their dealings with the boys and girls and vulnerable adults. For this reason, CIFA ETS shares its Policy with all organizations that are its Partners, and expects them to respect its principles and to guarantee support and collaboration.

CIFA ETS announces its pledge to protect the children and vulnerable adults, to all who are interested in any way in its dealings, and to all who are engaged in its projects, whether they be private or public subjects.

UNDERSTANDING CHILDREN AND VULNERABLE ADULTS

Understanding children and vulnerable adults, and getting to know about the forms of violence and exploitation to which they may be subjected, constitutes the starting points for the creation and the conservation of a secure environment.

By violence we intend any conduct which is not accidental, at the hands of parents, tutors, other adults, adolescents, or children, and which may produce a real or a potential risk to health, growth, or the dignity of the child or the adolescent. Such conduct may be intentional or unintentional, and may result from acts of omission (e.g. negligence), or acts of deliberate commission (eg. abuse). Within this vast definition we may identify 5 main categories of ill-treatment: physical ill-treatment, sexual abuse, psychological ill-treatment, carelessness or negligence and exploitation.



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WHAT ARE OUR RESPONSIBILITIES?

All the countries in which CIFA ETS works have ratified the Convention on the rights of the child (UNCRC-1989) and optional protocols, which is the treaty concerning human rights that is the most shared and agreed upon in the whole of history (the USA is the only country that has not yet ratified it).

This, however, shows up the weakness of the Convention because, although having been so widely ratified by the whole world, it is at the same time commonly not respected nor applied



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in the signatory states that have acknowledged it. And this is a source of great worry for CIFA ETS, which works where there are a great number of violations of the rights of children and adolescents, who are often victims of ill-treatment physical and psychological, of corporal punishments, sexual abuse and sexual and economic exploitation. Moreover there is an absence, in many countries in which CIFA ETS works, of measures and institutions which constitute alternatives to the family, for the care of children.

The staff of CIFA ETS, in Italy and abroad, and the Partner organizations, know about the juridical status, and about the effective protection of children's rights. CIFA ETS staff in Italy and abroad are requested to monitor periodically the relevant laws and the effective state of the children's rights, and the efficiency of the organs that are charged with their protection and observance.

Precisely to avoid the indifference and the failure to activate the rights of the children in places where CIFA ETS operates, every single person who is involved must feel himself personally responsible, in every moment of the day, in the protection of the boys and girls, by adopting the following measures:

1. Understanding their own role and function; CIFA ETS guarantees that its staff, its volunteers, its Members of the Board of Directors, are fully aware of the phenomena of ill-treatment, of carelessness and of exploitation of the children and the adolescents, and of their potential risks and all that is therein involved.
2. Prevent situations of peril: CIFA ETS, precisely in order to guarantee the reduction of risks and prevent situations of danger in which children may be involved, encourage and promote the diffusion of good practices, the creation of an environment that is safe and "of a scale that is comfortable for children", and supports and encourages the critical participation of the children themselves.



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3. Call attention immediately to the dangerous situation: CIFA ETS staff who are involved in the activities and projects of the organization must always keep in mind the measures to be adopted, and must point out rapidly, any and every potential situation of peril for the children.
4. Supply a rapid reply to the problems revealed: CIFA ETS promises to undertake actions of support and protection for the children and the adolescents in the case of need.

Any issue related to child protection should be communicated to Gianfranco Arnoletti, Child Protection Officer for CIFA ETS, at presidenza@ong.it

CORRECT ANALYSIS AND EVALUATION OF THE RISKS IN THE CIFA ETS PROJECTS

CIFA ETS, aware that the causes of risk are not always completely avoidable, favours an attitude of understanding and awareness of the problems and the specific risks for the security and the well-being of the children, so as to reduce to a minimum the occasions of abuse, exploitation and ill-treatment. For this very reason it defines, evaluates and manages the potential risks with a participatory approach that takes account of the typology of the risk occurring in the area of intervention (education, health, participation and protection), and of the country that is the destination of the intervention.

For every project and program, CIFA ETS undertakes to calculate and evaluate the potential impact of the activity, and of the changes caused by the project, upon the children and their parents who are involved, identifying and selecting strategies so as to reduce to the minimum the eventual risks.

CREATING AN ENVIRONMENT TO SUIT THE CHILDREN AND VULNERABLE ADULTS

The Centers in which CIFA ETS works, and its projects, must always be strictly suitable for the children and vulnerable adults, and that means:



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1. Guarantee the equality of each and every child and vulnerable adults, over and above considerations of race, religion/caste.
2. Respect for all opinions and needs of the children and vulnerable adults
3. Respect for the gender and the history of each child and vulnerable adults
4. Children, adolescents and vulnerable adults participate and are given opportunities to take active part
5. They are accessible to all the children and vulnerable adults involved
6. No forms of ill-treatment may exist, including violence, abuse, exploitation and child trafficking
7. Recreational activities are organized that will encourage healthy styles of life and the acquisition of competencies that are cognitive, social and emotive
8. The rules and regulations of the Centers are to be shared and agreed upon, and elaborated by, the children themselves
9. The children in the Centers are subjected to visits, periodically, to ascertain their health and their development
10. Unauthorized persons are not permitted to enter.

PROTECTION POLICIES

RECRUITMENT OF STAFF: To guarantee the security of the children involved and even those not necessarily within the projects of CIFA ETS itself, it is obligatory to select staff, collaborators and volunteers who know and respect the undertakings of CIFA ETS regarding the protection of children. As a consequence, the selectors shall be highly committed to sounding out the motivations of candidates wishing to work on all those matters that are inherent to infancy and adolescence. Selectors have to assess the candidates' understanding of the needs, emotional and material of the children in the context in which the project is to be carried out, and their knowledge about the nation in which they will be working; selectors must be sure that the



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candidates have made the theme of non-discrimination a choice of their lives, that they have references that are valid and correct, and that their documentation relative to their court records is in perfect order.

CHOICE OF PARTNERS, LOCAL, NATIONAL OR INTERNATIONAL.

An extremely rigorous attention must be paid to the choice of all partners, making sure that they have an ample sharing and agreement with the ethical principles and the goals and objectives of CIFA ETS. It is therefore always necessary to check very carefully on their sympathy with their mission, its values and strategies, as well as a full knowledge of the situation of the children in their local contexts.

Precisely for this reason the agreements with all other partners must include a continuous exchange of views regarding the protection of the children, and on their respective approaches, over and above an exchange and a comparison of their Policy of protection of the children.

POLICIES OF COMMUNICATION WITH CIFA ETS

All communications of CIFA ETS must be respectful of the general principles of communication regarding the children, and their themes which they share, and must be respectful of their dignity and their imagery. This respect must be observed in all cases: from all dealings with donors and with partners and volunteers, from the fund-raising campaigns, and from the awakening of interest in the activities of CIFA ETS - to initiatives of all and every type.

Stories and images used must be selected with respect for the superior interest of the child, and only published after receiving the consent of the adults who are familiar with and responsibly linked to the children concerned. Communications must never be vulgar or undignified, never for instance showing nudity or wounds.



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In every type of publication, we insist on the language used being respectful of the dignity of the children.

SHARING OF ETHICAL VALUES WITH THE DONORS

CIFA ETS insists on evaluating the ethical values of the donors before signing any agreements of collaboration or before authorizing the publication of any information that concerns the emblem(logo) or the name of CIFA ETS.

CONTINUOUS TRAINING FOR ALL THE OPERATORS, VOLUNTEERS, AND MEMBERS OF THE DIRECTIVE ORGANS OF CIFA ETS

Everybody who works in or for CIFA ETS must participate in training courses that the organization arranges at frequent intervals on the theme of child protection. The training courses are always based on international standards and principles regarding the rights and the fundamental needs of children. CIFA ETS has to work in such a way that these training courses give emphasis to the methods in which these rights shall be promoted, protected, and guaranteed through the projects, the policies and the developments which the organization is responsible for.

CIFA ETS undertakes to ensure for all its own operators, in Italy and abroad, continuous training, suited to the knowledge of the staff and the local context.

Special attention must be paid to the training of new staff or of those volunteers who have recently approached CIFA ETS. They are guaranteed a course of training on the Policies applied, on the concepts of the possible forms of ill-treatment and exploitation, also on the signals through which these can be recognized; also on the rights of the children as well, and on how to communicate to CIFA ETS possible lacks or absences in application or in training.



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CODE OF CONDUCT OF THE CIFA ETS OPERATORS

The staff of CIFA ETS and every volunteer who operates in the name of CIFA ETS are obliged to respect the Code of Behaviour laid down by the organization.

Each new member of staff must study the Code before or at the moment of signing the contract of engagement.

Both in their professional and private life, the staff of CIFA ETS adopt the standards of behaviour laid down in the code of conduct when dealing with children, recognizing that the good name and credibility of the organization depends on the conduct of each singular person engaged in the themes in which the organization is involved.

The above, but even more so, applies to the directors of the organization, and for those who represent CIFA ETS both in Italy and abroad.

Rules of conduct are in force even for the visitors to the projects of CIFA ETS. In all cases the person responsible for a project, or a center in which CIFA ETS works, may refuse entry to those visitors who do not respect the rules of the organization, or who do not comply with the timetables or other standards laid down in the Code of Conduct.

In every CIFA ETS project a person is nominated and trained to be responsible for the protection of children (C.P.O.), to whom is delegated the functions inherent in such a task.

Whenever, in a CIFA ETS operating center, operators suspect a case of abuse of a child, the C.P.O. must immediately inform/warn the same to the competent authorities. CIFA ETS lays down a code with the respective procedures to be adopted in every case, country by country.



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cifa.roma@cifaong.it

DATA PROTECTION PROCEDURES AND INFORMED CONSENT

CIFA ETS safeguards people's Privacy, keeping rules of conduct so that the processing of personal data takes place in accordance with the European Regulation 2016/679.

The Personal Data Controller is the CIFA ETS Association, in the person of its Legal Representative pro tempore.

Processing operations may only be carried out by Data Processors operating under the direct authority of the Data Controller or Data Processors, personally appointed for the purpose, required to comply with the instructions given and subject to control. Their designation is made in writing and punctually identifies the scope of permitted processing.

CIFA ETS has prepared the following internal procedures in the field of Privacy:

- General Data Protection Policy;
- Audit Management;
- Incident Management (data breach);
- Management of External Processors;
- Specific consent management;
- Management of disclosures;



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- Management of access and maintenance of data subjects' data;
- Management and use of IT equipment;
- Management of training;
- Management of inspections.

CIFA ETS manages the consent of users of the International Adoption service by means of the Information Notice pursuant to Article 13 of EU Regulation No. 2016/679, as well as making the Information Notice pursuant to Article 13 of EU Regulation No. 2016/679 (<https://www.CIFA.ETSong.it/privacy>) available to users of the institutional website.

REVISION OF THE RULES OF PROTECTION OF CHILDREN AND VULNERABLE ADULTS

Every two years CIFA ETS organizes a revision of the rules above. The children and vulnerable adults themselves are involved in this revision and also the operators who forward the requests to the Board of Directors.

The Board of Directors replies, quoting its own motivations for accepting or refusing the requests for changes.

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Anthropolis Child and Vulnerable Adults Protection Policy

Date of latest review: 03.07.2023

Definitions

A child refers to any person who has not yet reached the age of 18 years.

The policy also applies to young people. A young person refers to any person between and including the ages of 18 and 30 years old.

A vulnerable adult refers to individuals aged 18 years and above who are at greater risk than other adults due to individual factors such as gender, age, mental capacity, physical disability, or as a result of social factors such as inequality, traumatic experiences or poverty. This definition is included because Anthropolis often works with marginalised and minority groups as well as children and young people.

An adult refers to individuals who are 18 years old or older.

Protection refers to actions taken to protect children, young people and vulnerable adults as well as promote their wellbeing.

Purpose and Scope of the Policy

Anthropolis intends to promote global education through developing and distributing educational resources and delivering workshops in educational settings, primarily schools, as well as providing training in Digital Storytelling to empower individuals and communities to share their story with others to promote global learning and citizenship. Anthropolis' work includes providing training about sustainable development issues and the methodology of Digital Storytelling to pupils, teachers, students, foster carers and those from minority backgrounds. These activities frequently involve children, young people and/or vulnerable adults, such as collecting stories from, and providing educational workshops for these individuals.

Anthropolis recognises the potential risks children, young people and vulnerable adults face and is committed to protecting them. These risks include, but are not limited to; violence, injury, exploitation, slavery, abuse (including physical, mental, emotional, financial or sexual), neglect, maltreatment and risks related to characteristics such as gender, sexual orientation, ethnic origin, disability, age or illness.

As responsible global citizens, the organisation recognises its influence and therefore its responsibility, to protect such individuals. Thus, the nature and participants of Anthropolis' work make it important for the organisation to have such a policy. The policy will set out the organisation's intended actions to protect children, young people and vulnerable adults and how to respond to concerns related to this.

Thus, the purpose of this policy is to:

- Provide protection to the children, young people and vulnerable adults, who receive or participate in Anthropolis' services, including children of staff and volunteers.
- Provide staff, volunteers and others working within Anthropolis with guidance about procedures they should follow in circumstances when they suspect that a child is, or may be, at risk of harm.

To whom this policy applies

This policy applies to all paid and voluntary staff, students, volunteers or anyone else working on behalf of Anthropolis Public Benefit Association, as well as any partners with whom Anthropolis works. By definition, the policy also applies to those at-risk groups which it aims to protect.

With whom is this policy shared

- All those who participate in or benefit from the work of Anthropolis, including parents and guardians of children, are given access to this policy, via its publication on the organisation's website, in order to understand their rights and to call attention to behaviours which are not in accordance with the policy.
- All Anthropolis personnel, including all staff and volunteers, are required to read and agree to adhere to this policy. Training is provided to provide a deeper understanding of protection and how to implement the policy to situations which are possible in Anthropolis' work.
- Any organisations with whom we collaborate or share information, including regular or occasional partners, are required to agree to adhere to the policy as they work with us.

Legal Framework

Anthropolis ensures the protection of children, young people and vulnerable adults by requiring that all adults involved in the activities of the association are acting in accordance with their legal responsibilities, using the relevant national legislation and international directives. The policy has been developed on the basis of the following key legislation:

- The Fundamental Law of Hungary (Constitution) (25 April 2011)
- Act XXXI of 1997 on the protection of the child on the management of public guardianship
- Act LXIV of 1991 on the Convention on the Rights of the Child
- Act CXXV of 2003 on equal treatment and the promotion of equal opportunities
- Act XXVII of 2001 on the prohibition of the worst forms of child labour
- Act LXXIX of 1993 on public education
- The UN Convention on the Rights of the Child (General Assembly resolution 44/25 of 20 November 1989)

Our Commitment

Anthropolis recognises that all children, young people and vulnerable adults, without exception or discrimination, have the right to be safe and protected. Furthermore, they deserve for their needs to be catered for, to promote their optimal development.

In particular, Anthropolis' Child Protection Policy, in accordance with the European Union's *Child Safeguarding Standards*, is based on the following set of principles:

- All children have equal rights to protection from harm.
- Everybody has a responsibility to safeguard and support the protection of children.
- Anthropolis, as an organisation, have a duty of care to children with whom they work, are in contact with, or who are affected by their work and operations.
- All Anthropolis personnel have a responsibility to help partners meet the minimum requirements on protection, while working with them.
- All actions on child protection are taken in the best interests of the child, which are paramount.

Responsibilities

In accordance with the above, all staff and volunteers are responsible for providing the necessary environment and attentiveness to keep children, young people and vulnerable adults safe. There is no designated safeguarding lead in the organisation, due to the small numbers of personnel, and therefore, all personnel are equally responsible. The following principles are Anthropolis' expectations for all personnel. As adult citizens, all staff and volunteers are required to:

- Prevent risk by completing appropriate risk assessments and implementing cautionary measures, adhering to and encouraging good practice and adherence to all policies and procedures, and promoting an environment where children, young people and vulnerable adults feel able and without discrimination to report any issues they suspect or experience.
- Staff and volunteers will always work in partnership with parents, guardians and those directly responsible for children by profession, as well as those who hold responsibility for the child in other roles and settings, such as social workers, when applicable.
- Receive training and maintain awareness regarding signs of abuse, exploitation or other risks.
- Be vigilant in detecting and reporting potential protection concerns or risks promptly to senior staff. If anybody working for or with Anthropolis perceives, suspects or is notified that a child is in danger or under threat, whether by the child themselves or anybody else, they should follow the procedure outlined in the 17. § (1) paragraph of Act XXXI of 1997, by notifying the child's
 - a. guardian
 - b. direct member of the child's "warning network" ("jelzőrendszer")

-
- c. the locally responsible agency of the child protection services (“Gyermekjóléti és gyermekvédelmi szolgálat”)
 - d. the police in severe cases, such as allegations of sexual abuse.
- Risk assessments will be completed for each activity in which Anropolis engages, to identify and implement strategies to reduce these risks to be avoided and as minimal as possible.
 - Protection specific policies will be implemented in relevant operations of the organisation, such as recruitment and hiring, communications (particularly in the use of digital photographs and videos), choice of partners, sharing of information and continuous training.
 - Code of conduct established of which all personnel and partners are aware of and agree to adhere to, which will be monitored by.
 - Concerns should be reported to senior management. The information recorded will be held confidentially, except those whom it concerns and in cases where those involved are at risk of danger or pose a risk to others, in accordance with the EU’s GDPR law.
 - Any issue related to child protection should be communicated to Viktória Mihalkó, Child Protection Officer for Anropolis, at viki.mihalko@gmail.com

Responsibilities of the Presidential Board

- The Presidential Board of the Association has to make sure that all executives, staff and volunteers of Anropolis Association are informed about:
 - children’s rights,
 - the principles of child protection,
 - the relevant legislation, legal responsibilities and procedures.
- If necessary, the Presidential Board has to provide information, consultation, guidelines or training opportunities for staff and volunteers about their roles and responsibilities.
- In case of any incident the President or the executive appointed by the President is responsible to keep records and provide guidance and supervision for the involved staff or volunteer.

Guidelines on ethical photography

Photographs and videos taken by Anropolis’ staff or a photographer appointed by Anropolis should respect human dignity and ensure the rights, safety and well-being of the person or people being portrayed. This means:

- Understanding national laws related to photography, filming and privacy rights.
- Gaining appropriate verbal or written informed consent before taking photographs or videos.
- Respecting a person’s right to refuse to be photographed or video.

Photographs and videos of issues that are culturally sensitive, politically sensitive or socially stigmatised must protect the identity and privacy of individuals.

- Do not identify individuals. Position the camera in such a way that faces and other unique characteristics cannot be discerned.
- Obtain informed written consent to use real names and locations in situations where disclosure could result in harm. Otherwise, remove detailed personal information such as names and locations in captions or any other associated documentation.
- Identifiable images of individuals should not be used to illustrate sensitive subject matter in such a way as to indicate that the individual is connected with the issue.

Photographs or videos of people with special needs are to be taken with particular care, compassion and protection of privacy.

- Photograph or videos all people with respect and dignity. Special care and compassion must be exercised with vulnerable subjects.
- Survivors of sexual exploitation, gender-based violence or abuse are not be identified as such.

Photographs or videos of children taken for work related purposes must adhere to standards arising from Anthropolis' Child and Vulnerable Adults Protection Policy. Before photographing or filming a child, staff or contractors must obtain informed consent from the child and a parent or guardian and explain how the image or video will be used. In group situations such as a classroom, confirmation of previous parental consent is to be obtained from a school principal or senior teacher. In addition:

- Before photographing or filming a child, assess and comply with local laws, traditions or restrictions for reproducing personal images.
- Ensure photographs, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
- Images must be honest representations of the context and the facts.

Revision and Updating of this Policy

The General Assembly and the Presidential Board will review the Child and Vulnerable Adults Protection Policy annually to ensure that the document is in line with relevant regulations, by... keeping updated regarding legislation and reviewing its application within the organisation's current projects and activities. This will then be reviewed and approved by the Director.



Policy on Safeguarding Children

At CWEP, we prioritize the safety, well-being, and protection of all children in our care. We recognize our responsibility to create a secure environment that promotes safe practices and prevents harm, abuse, and exploitation. For the purpose of this policy and its associated procedures, a child refers to any individual below the age of 18 (according to UNCRC).

CWEP acknowledges the potential dangers faced by children, young people, and vulnerable adults and is dedicated to safeguarding them. These risks encompass various forms such as violence, injury, exploitation, slavery, abuse (including physical, mental, emotional, financial, or sexual), neglect, maltreatment, and risks associated with specific characteristics like gender, sexual orientation, ethnic origin, disability, age, or illness.

As conscientious global citizens, the organization recognizes its influence and consequent responsibility in ensuring the protection of these individuals. Therefore, considering the nature of CWEP's work and the participants involved, it is essential for the organization to establish this policy. The policy will outline the intended measures the organization will undertake to safeguard children, young people, and vulnerable adults, as well as how it will address any concerns related to this matter.

Our organization is dedicated to embracing diversity, respecting the rights of children and young people, and fostering a culture of collaboration. This policy outlines our unwavering commitment to safeguarding children, based on the following fundamental principles:

1. The welfare of children is our paramount concern. We place the highest value on ensuring their safety, protection, and overall well-being.
2. We believe that every child, irrespective of their age, culture, disability, gender, language, racial origin, socio-economic status, religious belief, or sexual identity, has the right to be shielded from all forms of harm and abuse.
3. Safeguarding children is a collective responsibility. We firmly believe that everyone associated with CWEP shares the duty of protecting children and creating a safe environment for them.
4. We recognize and respect the rights of children to express their views on matters that affect them. We actively encourage open communication and provide platforms for children to share their thoughts and opinions should they wish to do so.



5. Collaboration with children, parents, and caregivers is essential. We strive to work in partnership with families and individuals involved in the care of children to promote their overall welfare, health, and development.

To ensure the realization of these principles, CWEP commits to the following actions:

1. We will promote the health and welfare of children by providing safe opportunities for their participation in a range of activities. Our goal is to enable children to engage in these activities without compromising their well-being or safety.
2. We will respect and uphold the rights, wishes, and feelings of children at all times. We will treat each child with dignity and ensure that their perspectives, desires, and emotions are acknowledged and valued.
3. CWEP will implement and adhere to appropriate procedures aimed at safeguarding children and protecting them from abuse. These procedures encompass clear protocols, comprehensive training programs for staff and collaborators, and the establishment of a secure reporting system for concerns or incidents.
4. We are committed to recruiting, training, supporting, and supervising our staff, members, and collaborators to adopt best practices in safeguarding and protecting children. By providing ongoing education and support, we aim to ensure that everyone associated with our organization understands their role in creating a safe environment for children while reducing risks to themselves.
5. It is mandatory for all staff, members, and collaborators to comply with this Child Protection Policy and its associated procedures. By adhering to these guidelines, we can collectively maintain a culture of safety and security for children within our care.
6. In the event of any allegations of misconduct or abuse of children, we will promptly respond in accordance with this Policy and its procedures. We will ensure thorough investigations are conducted, and if necessary, appropriate disciplinary and appeals processes will be implemented.
7. CWEP will observe and comply with guidelines issued by local Child Protection Committees for the protection of children. We recognize the significance of aligning our practices with the recommended standards and guidelines established by relevant authorities.



To evaluate the effectiveness of this Policy and its procedures, we will conduct regular monitoring and evaluation. Reviews will be carried out at least every three years, or when there are changes in legislation, guidance on child protection, changes within CWEP, or concerns raised regarding the protection of children.

The following terms have been used for the purposes of this document:

Child is any person under the age of 18.

Child Abuse can be defined as an act, or failure to act, on the part of a parent, guardian and / or caregiver that results in the death, serious physical or emotional harm, sexual abuse, or exploitation of a child, or which places the child in an imminent risk of serious harm, and / or seriously impacts the child's long-term development and potential. The four main areas of abuse: physical, sexual, emotional and neglect. Each of these areas includes lists of possible behavioral and physical indicators known to be associated with that type of abuse.

Privacy Policy

CWEP with the offices in Rzeszów, 35-068, ul. Grunwaldzka 16C, registered in the District Court in Rzeszów, XII Commercial Department of National Court Registry, KRS number 0000211526, holder of tax identification number NIP: 813-351-94-55 and a statistical number REGON 180189259, is an administrator of personal data provided in connection with the use of the service, hereinafter referred to as "Personal Data". Personal Data provided is processed in compliance with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

Using the service provided by CWEP implies that you consent to the practice of collecting information and the use of said information in a manner that is in accordance with the principles specified herein.

The Personal Data that are processed are stored during the period of using the service. In case the service has not been used (accessed) for the period of 12 months, the Personal Data might be permanently deleted in compliance with this Privacy Policy.

The User has the right to withdraw the consent given for processing Personal Data at any time. The withdraw of the consent does not affect the lawfulness of processing based on consent before its withdrawal. The User has the right to lodge a complaint with a supervisory authority.

Changes to Personal Data

The user has the right to request access to and rectification or erasure ("right to be forgotten") of Personal Data or restriction of processing concerning the data subject



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or to object to processing as well as the right to data portability. Some information may be displayed and edited via the Internet using an Internet browser, upon logging into the service provided by CWEP.

CWEP shall reply to requests concerning displaying, correcting, completing and deleting Personal Data in reasonable time and upon the verification of the User's identity.

CWEP shall make all reasonable efforts to meet the requests of Users to delete Personal Data, unless these data need to be stored because of applicable law or legal business purposes.

Contact

All requests for access to your information, modification of your information or questions concerning this Privacy Policy should be sent using our contact form, via e-mail or in writing to the following address:

Stowarzyszenie "Centrum Wspierania Edukacji i Przedsiębiorczości"
Grunwaldzka 16C
35-068 Rzeszow
Poland

Any issue related to child protection should be communicated to Agnieszka Cyburt, Child Protection Officer for CWEP, at office@cwep.eu



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Child Protection Policy

LABC srl is fully committed to safeguarding the welfare of all children in its care.

It recognises the responsibility to promote safe practice and to protect children from harm, abuse and exploitation. For the purposes of this policy and associated procedures a child is recognised as someone under the age of 18 years.

Staff and collaborators will work together to embrace difference and diversity and respect the rights of children and young people.

This document outlines LABC srl commitment to protecting children.

These guidelines are based on the following principles:

- The welfare of children is the primary concern.
- All children, whatever their age, culture, disability, gender, language, racial origin, socio-economic status, religious belief and/or sexual identity have the right to protection from all forms of harm and abuse.
- Child protection is everyone's responsibility.
- Children have the right to express views on all matters which affect them, should they wish to do so
- Organisations shall work in partnership together with children and parents/carers to promote the welfare, health and development of children.

LABC srl will:

- Promote the health and welfare of children by providing opportunities for them to take part in any given activities safely.
- Respect and promote the rights, wishes and feelings of children.
- Promote and implement appropriate procedures to safeguard the well-being of children and protect them from abuse.
- Recruit, train, support and supervise its staff, members and collaborators to adopt best practice to safeguard and protect children from abuse and to reduce risk to themselves.
- Require staff, members and collaborators to adopt and abide by this Child Protection Policy and these procedures.
- Respond to any allegations of misconduct or abuse of children in line with this Policy and these procedures as well as implementing, where appropriate, the relevant disciplinary and appeals procedures.
- Observe guidelines issued by local Child Protection Committees for the protection of children.
- Regularly monitor and evaluate the implementation of this Policy and these procedures.

For everything regarding data protection procedures and informed consent, LABC srl refers to the "Privacy Policy Document" (Documento Programmatico sulla Sicurezza) which is part of the National Requirement fulfilled by LABC srl. The document is attached as annex.

No external staff (like photographers, film makers etc.) are invited by the organization to any activities.

Any issue related to child protection should be addressed to Paolo Brusa as legal representative of LABC srl, in according to the current Italian Legislative framework and the consequent Privacy Policy Document.

Review

This Policy and the Procedures are regularly reviewed. See date at bottom for this revised version

- In accordance with changes in legislation and guidance on the protection of children or following any changes within LABC srl.
- Following any issues or concerns raised about the protection of children within LABC srl.
- In all other circumstances, at least every three years.



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Documento Programmatico sulla Sicurezza

Il presente documento viene redatto in aderenza alle disposizioni del GDPR - Regolamento 2016/679, al Decreto Legislativo 30 giugno 2003, n. 196, artt. da 33 a 36 (misure minime di sicurezza) nonché dal disciplinare tecnico contenuto nell'allegato B del citato decreto.

In particolare relativamente a:

- caso di trattamento di dati personali effettuato con strumenti elettronici l'obbligo della "tenuta di un aggiornato documento programmatico sulla sicurezza";
 - idonee informazioni necessarie per redigere il predetto documento, che di seguito viene più semplicemente definito DPS.
- In particolare, sulla base delle regole previste dal disciplinare tecnico, il DPS è strutturato nelle seguenti sezioni:

sezione	contenuto
19.1	Elenco dei trattamenti di dati personali
19.2	Distribuzione dei compiti e delle responsabilità
19.3	Analisi dei rischi
19.4	Misure esistenti e da adottare
19.5	Criteri e modalità di ripristino della disponibilità dei dati
19.6	Pianificazione degli interventi formativi
19.7	Trattamenti affidati all'esterno
19.8	Cifratura dei dati o separazione dei dati identificativi

Il presente documento viene redatto dal dott. Brusa Paolo nella sua qualità di legale rappresentante di LABC srl, che provvede a sottoscriverlo in calce.



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Regola 19.1 Elenco dei trattamenti di dati personali.

LABC srl tratta i seguenti dati personali:

- dati personali non sensibili dei clienti, dei fornitori o di terzi ricavati o ricavabili da elenchi pubblici, albi professionali o camerali, visure e certificati camerali;
- dati personali non sensibili dei clienti, forniti al fine di espletare gli incarichi affidati al titolare del trattamento, compresi i dati sul patrimonio o sulla situazione economica;
- dati personali non sensibili di soggetti terzi, forniti dai clienti per l'espletamento degli incarichi affidati al titolare del trattamento, o relativi alla reperibilità e alla corrispondenza con gli stessi;
- dati personali non sensibili di fornitori, affidati al titolare del trattamento al fine della reperibilità e della corrispondenza con gli stessi, nonché per fini contabili, fiscali, o di natura bancaria;
- dati personali non sensibili dei dipendenti e dei collaboratori, necessari al regolare svolgimento del rapporto di lavoro o di collaborazione, alla reperibilità e alla corrispondenza con gli stessi, o richiesti ai fini fiscali, previdenziali, nonché quelli affidati al datore di lavoro per esigenze di natura bancaria.

LABC srl tratta i seguenti dati sensibili:

- dati sensibili dei clienti, relativi alla tipologia dell'intervento psicologico e di supervisione clinica, idonei a rivelare eventuali situazioni sanitarie.

Nella tabella 1.1 che segue si elencano schematicamente i trattamenti esistenti alla data di redazione e sottoscrizione del DPS, compresa ogni utile informazione idonea ad identificare inequivocabilmente il trattamento, la struttura aziendale all'interno della quale il trattamento viene eseguito, gli strumenti utilizzati nel trattamento. Per questi ultimi, ove necessario, sono indicati ulteriori elementi necessari alla miglior individuazione di quanto tecnicamente utilizzato a supporto del singolo trattamento.

Tabella 1.1 - Elenco dei trattamenti				
1	Identificativo	1	Descrizione	Dati anagrafici clienti
	Natura dei dati	[X] Personali [X] Sensibili	[X] Giudiziari	Data aggiornamento come da data in calce
	Strutture aziendali	Via Musinè 12 – 10143 To	strutture esterne(3)	- studio commercialista Patella Marco
Strumenti utilizzati:				
	Banca dati utilizzata	Ubicazione fisica supporti	Tipo dispositivi di accesso	Tipo di interconnessione
	Documentazione cartacea	- armadio	- serratura	nessuna
	Archivio / Database su PC client	- memorizzazione sul pc - stanza chiusa a chiave, non accessibile	- riservato all'intestatario; - accesso PC con password	Fastweb

Regola 19.2 Distribuzione dei compiti e delle responsabilità.

LABC srl, per quanto riguarda l'organigramma e il mansionario, fa riferimento a:

- ! "Codice Deontologico degli Psicologi Italiani", consultabile presso lo studio per quanto riguarda l'attività clinica, di formazione e di supervisione clinica
- ! quadro legislativo nazionale per gli interventi formativi finanziati tramite bandi pubblici e per le commesse ricevute da clienti privati
- ! quadro legislativo della Commissione Europea per quanto riguarda le linee di gestione dei finanziamenti legati a programmi finanziati dalla Commissione Europea

Regola 19.3 Analisi dei rischi.

La totalità dei dati trattati possono essere conservati, alternativamente o contemporaneamente, in fascicoli riposti in schedari dotati di chiusura, in locali protetti, archiviati al termine della pratica, e tramite personal computer connessi in rete.

Le sede di LABC srl, ove vengono trattati i dati, è ubicato in singolo stabile sito in via Musinè 12 – 10143 Torino, dotato di porta con chiusura automatica, citofono, senza sorveglianza notturna e senza sistema di allarme.

Le singole stanze che compongono la sede sono dotate di chiave.

Lo studio è dotato di personal computer connesso ad Internet con connessione a banda larga, e con i seguenti dispositivi: stampante laser e fotocopiatrice.

È stata compiuta l'analisi dei rischi, avendo attenzione alla tipologia degli eventi che possono generare danni e che comportano quindi rischi per la sicurezza dei dati personali, nonché all'impatto sulla sicurezza dei dati, in relazione a ciascun evento e alla gravità e probabilità stimata dell'evento stesso.

Per ciascun eventi probabile, si è ipotizzato naturalmente la contromisura adottata o da adottare.

Sinteticamente, si valuta basso il rischio legato alla gestione dei seguenti trattamenti (identificati come da tabella 1.1, alla quale si rimanda per i dati caratteristici):

trattamenti con rischio basso	
Identificativo	Descrizione di massima
1	Dati anagrafici clienti

Di seguito sono elencati gli eventi che possono verificarsi, suddivisi in base alla natura della causa scatenante (operatori, strumenti elettronici, struttura aziendale); per ciascuno è specificato l'identificativo della contromisura, per il cui dettaglio si rimanda alla successiva sezione 19.4.

La tabella che segue è quella predisposta dall'ufficio del Garante della privacy; come indicato dal medesimo ufficio, si tratta solo di una lista esemplificativa e non esaustiva, da prendere come base di partenza per ogni utile implementazione legata alle specifiche esigenze e peculiarità di ciascun soggetto interessato alla redazione del DPS

Tabella 3.1 - Analisi dei rischi			
	Evento	Descrizione	Contromisura
comportamenti del titolare	Furto di credenziali di autenticazione	Le credenziali non vengono affidate a terzi	Copia delle credenziali, in caso di dimenticanza, è archiviata in busta chiusa e plico anonimi

	Carenza di consapevolezza, disattenzione o incuria	Rischio basso	Consulenza con società specializzata
	Errori materiali	Rischio basso	Copia di backup

Eventi relativi agli strumenti	Azione di virus informatici	Rischio basso	Antivirus installato sui device in utilizzo
	Spamming o altre tecniche informatiche di sabotaggio	Rischio basso	Antispam sul server pop e smtp dei fornitori
	Malfunzionamento strumenti elettronici	Rischio basso	Aggiornamento sw e copie di backup
	Accessi esterni non autorizzati	Rischio basso	Firewall sw
	Intercettazione di informazioni in rete	Rischio basso	Sistema di invio mail supportato in SSL

Eventi relativi al contesto strutturale	Accessi non autorizzati a locali ad accesso ristretto	Rischio basso	Accesso ai locali controllato direttamente dal titolare
	Asportazione e furto di strumenti contenenti dati	Rischio basso	Backup su supporto removibile
	Eventi distruttivi, naturali o accidentali o dolosi, o per incuria	Rischio basso	Estintore antincendio in vano scale, pc sollevato da terra
	Guasto ai sistemi complementari (impianti elettrico, condizionamento)	Rischio basso	Presenza UPS per protezione elettrica
	Errori umani nella gestione della sicurezza fisica	Rischio basso	Cobian sw per backup e consulenza specializzata

Regola 19.4 Misure in essere e da adottare.

A fronte dell'analisi dei rischi di cui alla precedente sezione 19.3, di seguito si descrivono le misure di sicurezza adottate dallo studio.

Misura 1. Antivirus. Ogni computer è dotato di dispositivo antivirus, che viene aggiornato con funzione automatica e con scansione per ogni aggiornamento antivirus, e in ogni caso almeno settimanalmente, in orario compatibile con il fatto che il computer non sia spento (in questo caso la scansione avverrà alla successiva accensione).

Misura 2. Firewall. Sul server è stato installato firewall con le seguenti caratteristiche: ...

Misura 3. Backup. E' stato disposto l'obbligo di provvedere ad un backup settimanale dei dati e dei sistemi installati sul server su cd rom, i quali vengono conservati e chiusi in un armadio chiuso a chiave e protetto da agenti ignifughi, e si è data disposizione di verificare, effettuato il backup, la leggibilità del supporto e che una volta a settimana si proceda a verifica a campione della leggibilità dei dati; una volta effettuato e verificato un backup, deve essere distrutto il cd rom precedente.

Misura 4. Screensaver. Tutti gli utilizzatori di strumenti elettronici non devono lasciare incustodito, o accessibile, lo strumento stesso. A tale riguardo, per evitare errori e dimenticanze, è stato predisposto lo screensaver automatico dopo ... minuti di non utilizzo, con ulteriore password segreta per la prosecuzione del lavoro.

Misura 5. Autenticazione informatica. Tale misura è stata adottata dotando ciascun incaricato di una password di almeno 8 caratteri. Detta password non contiene, né conterrà, elementi facilmente ricollegabili all'organizzazione o alla persona del suo utilizzatore, né alla società. La stessa viene autonomamente scelta dall'incaricato e dallo stesso custodita in una busta chiusa che viene consegnata al titolare del trattamento, il quale provvede a metterla nella cassaforte in un plico sigillato. Ogni tre mesi ciascun incaricato provvede a sostituire la propria password. Si è altresì disposto che le password vengano automaticamente disattivate dopo tre mesi di non utilizzo.

Misura 6. Archiviazione. Si è disposto che non siano lasciati incustoditi sulle scrivanie, o su altri ripiani, atti, documenti e fascicoli delle pratiche. I fascicoli vanno conservati negli appositi schedari e prelevati per il tempo necessario al trattamento per esservi poi riposti.

Misura 7. Stampe centralizzate. Quando è dato un ordine di stampa, il documento stampato dovrà essere prontamente prelevato dall'interessato o consegnato allo stesso.

Misura 8. Fax. I fax sono ricevuti su carta normale, e quindi è evitato il deterioramento tipico della carta chimica. I documenti arrivano in zona protetta, accessibile solo dagli incaricati dell'area della segreteria, con la parte scritta verso il basso per evitare di rimanere in vista incidentalmente.

Misura 9. Archivio. Il locale destinato all'archivio è sempre chiuso a chiave. L'incaricato preposto dovrà controllare l'accesso all'archivio. Fuori dall'orario di lavoro l'accesso all'archivio è consentito esclusivamente previa registrazione.

Misura 10. Distruzione documenti. Si è data istruzione che il materiale cartaceo asportato e destinato allo smaltimento dei rifiuti sia riposto negli appositi sacchi di plastica, previo passaggio nelle apposite macchine tagliadocumenti (in dotazione almeno in misura di uno per ciascun ufficio) e che detti sacchi siano chiusi in modo che atti e documenti negli stessi contenuti non possano accidentalmente fuoriuscire, e che detto materiale sia giornalmente asportato.

Misura 11. Eventi naturali. La società ha provveduto ad adottare le disposizioni di sicurezza stabilite dalla L. 626/94.

Regola 19.5 Ripristino della disponibilità dei dati.

Oltre alla procedura di backup (vedasi Misura 3 della precedente sezione) lo studio ha approntato la seguente procedura di "disaster recovery", vale a dire di ripristino della disponibilità dei dati.

Si premette che ci si avvale anche della consulenza informatica di Diciannove Società Cooperativa

Nell'ipotesi di distruzione o danneggiamento dei dati o degli strumenti elettronici:

1. deve essere avvertito il titolare del trattamento dei dati e l'incaricato che ha in custodia l'hard disk di back up ;
2. ci si deve rivolgere immediatamente al tecnico manutentore del consulente informatico sollecitandone al più presto l'assistenza;
3. ciascun incaricato deve provvedere ad inventariare nella maniera più precisa possibile il lavoro svolto dal momento dell'ultimo back up al momento della rottura irreversibile;
4. si devono reinstallare i programmi danneggiati o distrutti, sempre che non sia necessario sostituire l'intero hardware, provvedere a reinstallare tutti i dati contenuti nel hard disk di back up;
5. si deve provvedere all'aggiornamento dei sistemi operativi una volta reinstallati;
6. al fine di evitare eventi di perdita e di danneggiamento degli strumenti elettronici e dei dati in essi contenuti, si prevede che per due volte all'anno sia effettuata manutenzione in modo adeguato dal tecnico incaricato.



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Regola 19.6 Pianificazione degli interventi formativi.

Nell'ambito delle procedure di tutela della sicurezza dei dati trattati dallo studio si è proceduto a stilare il piano dell'impegno formativo che si prevede di sostenere in attuazione della normativa sulla privacy, secondo la tabella che segue.

Tabella 6.1 – Interventi formativi previsti					
Corso di formazione	Descrizione sintetica	Categorie interessate	Numero soggetti interessati	Incaricati già formati in preced.	Calendario date
aggiornamento	aggiornamento	titolare	1	Non presenti	Marzo ogni anno
aggiornamento	aggiornamento	titolare	1	Non presenti	settembre

Regola 19.7 Trattamenti affidati all'esterno.

In quest'ultima sezione vengono fornite, con l'ausilio della successiva tabella 7.1, tutte le indicazioni necessarie ad identificare i dati trattati all'esterno, nonché i soggetti coinvolti.

Si premette che è stata predisposta idonea documentazione rilasciata dai soggetti cui le varie attività sono affidate dalla quale risulta:

- che il terzo dichiara di essere consapevole che i dati da lui trattati nell'espletamento dell'incarico ricevuto sono dati personali e, come tali, sono soggetti alla disciplina di cui al GDPR - Regolamento 2016/679;
- che il terzo dichiara di ottemperare agli obblighi previsti dal predetto GDPR - Regolamento 2016/679;
- che il terzo dichiara di adottare ogni istruzione ricevuta dal titolare del trattamento;
- che il terzo si impegna a relazionare il titolare in ordine alle misure di sicurezza da lui adottate, notiziando il committente circa le situazioni di pericolo per i dati in cui potrebbe imbattersi;
- che il terzo dichiara di riconoscere il diritto del committente alla verifica periodica dell'applicazione delle norme di sicurezza adottate.

Tabella 7.1 – Trattamenti affidati all'esterno					
Attività esternalizzata	Descrizione sintetica	Dati sensibili e giudiziari interessati	Soggetto esterno incaricato	Descrizione criteri per adozione misure di sicurezza	Date delle verifiche
Tenuta contabile	Contabilità e pratiche connesse	Dati sensibili	Studio commercialista Marco Patella – Corso Francia 68, Torino	- consegna manuale - invio telematico protetto - vincolo etico professionale	Mensili