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CHILD PROTECTION POLICY OF THE UNIVERSITY OF TRENTO



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PREAMBLE

The University of Trento (from now on UniTrento) stands as a prominent research center that holds human dignity, respect, and accountability as top priorities, as outlined in its Code of Conduct, Code of Ethics and Guidelines of the University of Trento for Research Integrity. It upholds the principle of equal human rights for all, including minors, ensuring their participation in decisions affecting them. Recognizing minors' vulnerabilities, UniTrento values their autonomy and self-determination, while acknowledging the diverse risks minors can face due to ethnicity, gender, age, religion, disability, and sexual orientation.

UniTrento recognizes the importance of research activities with minors as strategic for achieving the objectives of the University of sustainable development, particularly in reducing inequalities and ensuring health and well-being, peace, justice, and strong institutions.

Recognizing the significance of ethical and legal considerations, particularly concerning children as research subjects, the University is committed to proactively addressing potential challenges that might arise. UniTrento upholds the principle of 'do no harm' as paramount in all research activities involving direct interactions with children and minors.

It adheres to European and international standards aimed at protecting minors' rights and implements proactive measures to mitigate risks. These endeavours align with sustainable development goals by addressing inequalities and promoting health and well-being for all.

This Child Protection Policy, accessible on the University's website, serves as a framework for research involving children, ensuring adherence to ethical standards and legal obligations. It applies to all stakeholders engaged in research, establishing a system of oversight to safeguard children's rights. This policy regards individuals under the age of 18, and the terms 'children' and 'minors' are used interchangeably.

This policy is based on the United Nations Convention on the Rights of the Child and Keeping Children Safe International Safeguarding Standards. It undergoes continuous monitoring (with reviews conducted at least every three years) and adjustments to accommodate evolving needs, legislative changes, guidance updates, and institutional developments at UniTrento. Incidents, abuse allegations, and complaints are documented and monitored systematically.



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This policy constitutes an annex to the Guidelines of the University of Trento for Research Integrity and shall be interpreted and applied in a manner consistent with those Guidelines and the other related policies adopted thereunder.

PART I - PURPOSE, APPLICABILITY, AND DEFINITIONS

Art. 1 - Purpose and applicability

The policy applies specifically to research with direct interaction with minors and encompasses all research conducted by teaching and research staff, collaborators and trainees of UniTrento.

The policy strives to shield minors from any harm arising from misconduct by personnel and affiliates, as well as from operational activities that might jeopardize their well-being. Thus, it is crucial to identify and mitigate any potential risks associated with involving children in research activities. To achieve this, research involving children follows a risk-based methodology, ensuring the safety and well-being of all participants. This document sets forth foundational principles and guidelines regulating research that entails direct interactions between the research staff of UniTrento (including faculty, researchers, PhD students, collaborators, trainees) and children. Additionally, it clarifies the responsibilities of the involved parties and delineates the measures taken to address potential misconduct or unintended harm.

Third-party collaborators in local, national, European, and international projects with UniTrento are assessed to ensure they have adequate child safeguarding measures in place.

Art. 2 - Definitions

Child/Minor: every human being below the age of eighteen years unless under the law applicable to the child, majority is attained earlier (art. 1, Convention on the Rights of the Child). The terms 'child' and 'minor' are used interchangeably in this policy.

Adolescent: a human being in the transitional period between childhood and adulthood, generally considered to fall within the teenage years. While there is no universally fixed age range, adolescence typically encompasses individuals roughly between the ages of 13 and 17. It is a stage characterized by significant physical, emotional, and social development, leading towards the attainment of legal majority as defined by the laws applicable to them (typically at age 18, unless specified otherwise).



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Person exercising parental responsibility: a person or entity to whom the law or judge has recognized the power to make decisions on behalf and for the benefit of the minor in their exclusive interest (e.g., for parents art. 316 and art. 320 of the Italian Civil Code, for guardians art. 357 of the Italian Civil Code).

Consent to the processing of personal data (privacy consent): 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 (art. 4, n. 11 GDPR).

Consent to research participation: the person's free and voluntary expression of the willingness to participate in a particular research project, after having been informed of all aspects of the proposed research. For minors, consent is given by both parents or by the person exercising parental responsibility.

Assent: a child's affirmative agreement to participate in research, after having been informed of all aspects of the proposed research, in a manner and with a tone appropriate to their discernment and competence. Minors are not legally capable of providing informed consent, which is expressed on their behalf by those who have parental responsibility. Nevertheless, minors must be informed and express their assent or dissent to their participation in research activities, in accordance with their age and maturity, and regardless of legal capacity (in accordance with Art. 12 of the Convention on the Rights of the Child).

Personal data: any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as name, an identification number, location data an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person (art. 4 n. 1, GDPR).

Harm: physical, psychological, or social damage negatively impacting an individual.

Well-being: a balanced state of physical, mental, psychological, emotional, and social health and satisfaction, crucial for quality of life and development.

Research Staff: members of UniTrento who are entrusted with the execution of collaborative research projects under the supervision and counsel of the Principal Investigator (PI). This category may encompass trainees and students participating in the research endeavours.



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PART II - INSTITUTIONALS ROLES

Art. 3 - UniTrento

UniTrento:

- a. provides comprehensive written documents on its Child Protection Policy to all new staff/partners who have contact with minors;
- b. publicises the Child Protection Policy and Research Ethics Committee's guidelines on its website, offering clarity on specific aspects of the consent and assent procedures;
- c. guarantees the appropriate circulation and knowledge of this policy, assessing and promoting the necessary information to staff and partners with the support of the relevant Department's staff;
- d. provides child protection training for staff assigned in projects where they will work directly with children;
- e. ensure that partner organizations that are involved in research activities with UniTrento have developed minimum child safeguarding measures appropriate to their organization.

Art. 4 - Principal Investigators

Principal Investigators (PIs):

- a. are responsible for ensuring policy and practice compliance, monitoring all aspects of the Child Protection Policy within their research projects and among their collaborators, and reporting any violations to the Rector and/or relevant authorities;
- b. are responsible for the selection and training of the staff collaborating with them in activities involving minors, ensuring that the staff member has adequate expertise in relation to the research activity he or she is required to carry out with minors, and ensuring also the absence of criminal convictions for offenses against minors (Annex 2);
- c. provide their collaborators with precise instructions on the procedures for obtaining consent and assent;
- d. ensure that parents or legal guardians are informed in advance about the participation of children in research activities for which the consent of parents or legal guardians and the assent of children is required;



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- e. ensure that children understand the concept of assent and that they can withdraw it at any point, without any consequences;
- f. ensure that the consent of parents or legal guardians and the assent of children regarding the participation of children in research activities and in activities - also involving the collection of photographic or film images - are obtained, and provide all the necessary information to enable them to understand the purpose of the research activity and, if it is the case, of the images and the footage collected;
- g. maintain an open line of communication with legal guardians, or with teachers and educators if the activity is conducted within schools, ensuring they can freely contact and receive updates at any time;
- h. design and organise the research activities and environment so as to promote the safety, welfare and psycho-physical well-being of minors;
- i. reject all improper conduct by staff or partners, and ensure that any violation of the policy is duly confronted;
- j. ask for support from UniTrento's offices, including the Data Protection Office and the Research Ethics and Integrity Office, as well as the University's DPO to ensure compliance with privacy and ethics standards;
- k. incorporate extensive information on the University's Child Protection Policy in the briefing procedures for new staff who have contact with minors.

Art. 5 - Researchers

All researchers and collaborators involved:

- a. collaborate with the Principal Investigators to assess potential psychophysical and social harm specific to the age, abilities, and any disabilities of the minors involved in the research;
- b. avoid any exercise of power, psychological pressure, or significant conditioning and allow minors to freely express their opinions;
- c. set up a supportive environment where minors feel emotionally safe;
- d. handle any emotional or personal topics with care;
- e. provide the PI's a self-declaration of suitability to work with children, also ensuring the absence of criminal convictions for offenses against minors, as outlined in Annex 2;
- f. respect the minors' privacy, taking into account the emotional significance and vulnerability of minors



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- in their familial and affective relationships;
- g. ensure that the collection of personal data is limited to what is necessary for the research and solely focused on those purposes;
 - h. process personal data of minors in full compliance with applicable laws, and store such data only for as long as necessary in pseudonymised form and, thereafter, exclusively in anonymised form;
 - i. ensure the ethical handling, storage, and accessibility of data to other parties.

Art. 6 - Research Ethics Committee

The Research Ethics Committee (CER):

- a. thoroughly reviews each project involving children conducted by UniTrento's researchers before its start. Special attention is given to ensuring children's safety and well-being, and projects are not approved if deemed non-compliant with the necessary safeguards.
- b. thoroughly evaluates in the research protocol:
 - the objectives of the research activities involving children;
 - the procedures implemented to safeguard their welfare, along with the rationale for their involvement;
 - the methodology employed in research activities with children;
 - the recruitment process for researchers and collaborators involved in projects with children.
 - the procedure for obtaining consent from parents/legal representatives, including recommended forms;
 - the procedure for obtaining assent from the children;
 - the limitation of personal data collection to what is essential for research purposes, ensuring compliance with relevant laws governing the processing of children's personal data, in collaboration with the Data Protection Officer and the Data Protection Office.

Art. 7 - Human Resources Department

Human Resources Department:

- a. ensures that staff directly engaged in activities involving the participation of minors acknowledge the Child Protection Policy;



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- b. ensures that hired researchers do not have criminal convictions for offenses against minors and proceeds with the necessary criminal record checks in case the researcher who intends to take part in activity involving minors declares having convictions for offences against minors.

Art. 8 - Rector and Academic Senate Commission for the Implementation of the Code of Ethics

The Rector and the Academic Senate Commission for the Implementation of the Code of Ethics:

- a. act in accordance with art. 18 of the University's Code of Ethics;
- b. collect reports of situations or behaviours detrimental to the well-being of minors, or infringing upon their protection (such as lack of parental consent for participation). Reports can be submitted by any member of the academic community (students, faculty, administrative staff) or by parents/legal guardians on behalf of the minor. In case of a potential violation of the Code, they carry out the necessary investigation, the outcome of which shall be communicated to the Academic Senate or Disciplinary Board for any necessary disciplinary measures.

PART III - OPERATIONAL PROCEDURES

Art. 9 - Research Conduct

Throughout the entire research process, from project planning to implementation, the PIs and project staff are committed to ensuring that minors are involved in high-quality and scientifically relevant research. The safeguarding of children shall guide every stage of research and training, including planning, selection of personnel interacting with children, research and training endeavours, dissemination of findings, and evaluation.

Research involving minors must always undergo prior evaluation and approval by the Research Ethics Committee (CER) of UniTrento, or in case of clinical research, by the Territorial Ethics Committee of the Autonomous Province of Trento for Clinical Trials (CET-PAT), following the applicable regulatory framework, identifying specific technical and organizational measures aimed at protecting minors that are involved as research subjects because of their specific condition of patients.



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Children's dignity, freedom, rights, interests, and overall well-being are meticulously considered and safeguarded. The balance between the benefits they receive and the potential burdens they may face is carefully assessed, with effective risk assessment and management procedures in place, that are outlined in following paragraphs.

Art. 10 - Parental Consent and assent of the children

Clear and thorough communication about the research project and methods is crucial for minors and their parents or legal guardians to make informed decisions about participation in research activities.

The measures implemented to ensure this include:

- a. Prior to commencing the research, parental informed consent is obtained following a comprehensive explanation of the research procedures and objectives. Additionally, minors' assent is secured through tailored communication about the research procedure and objectives, adapted to their understanding and suitable for the research environment.
- b. When the minor is of an age and maturity level that allows them to make informed decisions, assent is obtained through signature of written documents that present the necessary information in age-appropriate language.
- c. When necessary, alternative communication methods such as audio, video, or graphics must be considered to effectively convey project details to minors. Consequently, Principal Investigators (PIs) and research staff must be adequately prepared for such interactions.
- d. Minor's dissent shall preclude their participation in the study, regardless of parental or guardian consent.
- e. Overall, interactions between minors and research staff must acknowledge the individual abilities and maturity of minors, considering factors such as their age and any disabilities.
- f. The procedures through which parental or legal guardians' consent and minors' assent are obtained are checked and validated by the Research Ethics Committee (CER) during the examination of the research protocol for projects involving minors (see art. 6).
- g. Project information sheets explicitly provide contact information of the Principal Investigator for further assistance.



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Art. 11 - Violations of the children protection policy

UniTrento is committed to intervening promptly upon becoming aware of any harm to minors resulting from their involvement in academic activities.

If any form of prejudice or discrimination towards one or more participating minors is identified during research activities, the research should be temporarily suspended and undergo comprehensive methodological review.

A template for information requests and reporting policy violations is readily available to all who deem it appropriate to report a violation of the policy (see Annex 1).

Anyone who observes or becomes aware of actions or behaviors that violate this Policy is requested to complete the form (Annex 1) and submit it to the Rector, following the procedure outlined in Article 18 of the UniTrento's Code of Ethics.

PART IV - FINAL PROVISIONS

Art. 12 - Monitoring and evaluation

This Child Protection Policy shall be monitored permanently by the University, reviewed at least every three years and revised in the light of different needs, changes in legislation and guidance and experience and/or structured changes within UniTrento. All incidents, allegations of abuse and complaints shall be recorded and monitored.



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ANNEXES

1. CHILD PROTECTION POLICY ISSUE REPORT FORM
2. DECLARATION, IN ACCORDANCE WITH ARTICLES 46 AND 47 – D.P.R. NO. 445 OF 28/12/2000 WHERE APPLICABLE, OF THE SUITABILITY OF RESEARCH GROUP MEMBERS IN CASE OF RESEARCH INVOLVING MINORS, IN ACCORDANCE WITH THE CHILD PROTECTION POLICY OF THE UNIVERSITY OF TRENTO