GONZAGA CAMPUS
Scuola · International School Palermo · Polisportiva

STAFF AND COLLABORATORS

Code of conduct
for the safeguarding of minors



ISTITUTO GONZAGA – PALERMO

CHILD PROTECTION POLICY

CODE OF CONDUCT FOR THE SAFEGUARDING OF MINORS

PREMISE

This document constitutes the Code of Conduct for the protection of minors and sets out the fundamental rules of behaviour that all staff of the Italian school and the international school of the Gonzaga Institute, managed by the "Casa della Compagnia di Gesù detta Collegio Gonzaga" (hereinafter "Gonzaga Campus"), are required to observe in their relationships with students and all individuals who, in any capacity, attend the institution, including students and athletes of the Gonzaga Polisportiva.

This Code of Conduct also extends to religious personnel, volunteer staff, and volunteers of the Universal Civil Service, limited to provisions compatible with the legal nature of such roles.

Failure to accept or comply with this Code of Conduct will be assessed by the General Director, who will adopt the appropriate disciplinary measures which, in accordance with the law, may also result in the termination of collaboration with the Institute.

PROVISIONS

1) All staff of the Italian School and the International School must observe the following behavioural principles, established to ensure consistency in staff conduct towards the school community:

i. Act as role models through their behaviour for both students and families, with particular regard to respecting and upholding the Catholic identity of the school.

ii. Use a balanced tone of voice and maintain measured, positive attitudes;

iii. Demonstrate a proactive and transparent attitude towards colleagues;

iv. Organize school time and activities with professionalism and accuracy;

v. Maintain strictly professional relationships with parents, avoiding excessive familiarity that may be inappropriate to the professional context;

vi. Report to the coordinator any relevant information concerning students or families that comes to their attention in the course of their duties, while maintaining professional confidentiality externally;

vii. Inform the School Management of participation in parties or recreational events organized by families.

2) Staff working in contact with minors must ensure compliance with the following provisions, inspired by criminal jurisprudence relating to offenses involving minors:

i. Physical punishment of minors is never permissible under any circumstances.

ii. Verbal abuse of minors or telling jokes or stories of a sexual nature in their presence is strictly unacceptable. If it becomes necessary to address topics related to sexuality with a class, a group, or individual students, utmost care and sensitivity must be exercised, including considering the presence of another responsible adult.

iii. Staff must not isolate themselves with a minor. When private conversation is necessary, it must take place in an appropriate setting that does not give rise to suspicion. Minors are not permitted to remain in school premises outside scheduled hours unless for exceptional reasons and with prior communication to the school coordinator. Afternoon activities must take place in designated areas with proper supervision.

iv. All minors must be treated with equal respect; favouritism is not acceptable.

v. No staff member may engage in or tolerate behaviour - verbal, psychological, or physical - that could be interpreted as bullying or abuse.

vi. It is prohibited to spend disproportionate time with a single minor or a specific group of minors beyond what is objectively necessary.

vii. Under no circumstances may staff provide alcohol, tobacco, drugs, or medication to minors outside established protocols.

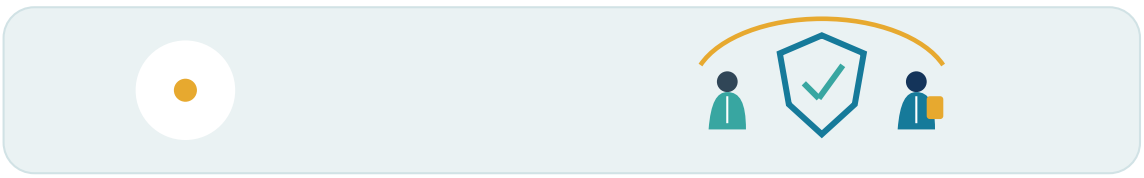
viii. Language used with minors must be age appropriate. Likewise, media content (such as mobile phones, internet, videos) and proposed activities (e.g., educational screenings) must be suitable for their age and aligned with the Catholic ethos of the school.

ix. Staff must not engage in any inappropriate physical contact with minors, except where strictly necessary and appropriate.

x. Tasks of a strictly personal nature should not be performed for minors if they are capable of doing them independently. Any activity requiring direct physical contact must be known to the family.

xi. Avoid gestures or expressions that could be misinterpreted.

xii. Particular care must be taken to respect privacy when minors are in changing rooms, showers, or bathrooms.



xiii.

• It is forbidden to take photographs or videos of students without authorization from the Management (which must verify parental consent), especially in changing rooms, bathrooms, or accommodation during trips;

• Staff must not enter students' rooms during school trips unless strictly necessary, nor host students in their own rooms;

• Disciplinary actions are permitted only as provided by school regulations;

• No travel in a private vehicle with a single minor is allowed, except in emergencies and with immediate communication to the parent/guardian.

xiv. Staff responsible for supervision must:

• Ensure adequate supervision during all school activities, in common areas, during breaks, and at entry and exit times;

• Be physically present and mentally attentive; avoid distractions such as smartphones or conversations with colleagues during supervision;

• Be familiar with safety policies and evacuation plans;

• Pay attention to signs of distress or behavioural changes;

• Treat all students fairly and impartially;

• Manage conflicts professionally and respectfully;

• Remain vigilant against any form of bullying, violence, or abuse;

• Promptly and appropriately inform parents of safety-related issues;

• Respect students' privacy.

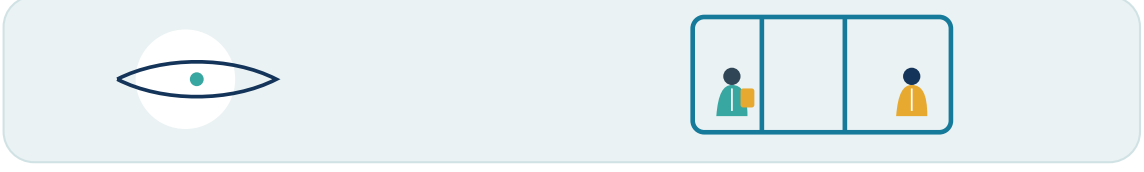
These provisions also apply to students who may have reached the age of majority during the final stage of their schooling.

3) In cases of confirmed or suspected abuse, the following procedural guidelines must be observed:

• The head of a public school (and state-recognized private school too) holds the status of a public official. Teachers are also recognized as public officials as they perform functions governed by public law.

• Public officials or individuals entrusted with a public service have the obligation (Articles 358–362 of the Italian Criminal Code), in the presence of prosecutable offenses, to report such offenses to the Judicial Authority or other competent authority (e.g., Police or Carabinieri), under penalty of the crime of failure to report (Article 361 of the Italian Criminal Code)

• Reporting procedures may differ only the school head (or equivalent) has external representation authority. Therefore, staff fulfil their obligation by reporting the "notice of crime" to the General Director, possibly after consulting the school coordinator. In private schools, the school head corresponds to the legal representative or delegate.



• The General Director, in coordination with school staff (school coordinators, teachers, administrative and support staff, etc.) who may have received a report or directly observed and perceived facts constituting a criminal offense, must report the matter by transmitting the information in their possession directly to the competent Public Prosecutor's Office or to the Judicial Police authorities in the area (State Police, Carabinieri). Reporting to other parties, even if they are themselves obliged to report, does not fulfill this obligation. This applies both where the minor is the victim and where the minor is the perpetrator of the offense.

• It is essential to avoid preceding the report with any form of internal verification or investigation, as such actions may lead to "contamination of evidence." The collection of evidence, the assessment of the reliability of information sources, and the determination of the subjective element (intent or negligence, in the case of negligent offenses) fall exclusively within the competence of the Judicial Authority.
The knowledge in question must concern facts, conduct, or behaviours (including those reported by others and not directly observed) that, in abstract terms, constitute the objective elements of a criminal offense.

• A "reasonably well-founded suspicion," upon which the Institute is required to act by notifying the public authorities, is formed on the basis of a range of factors, including:

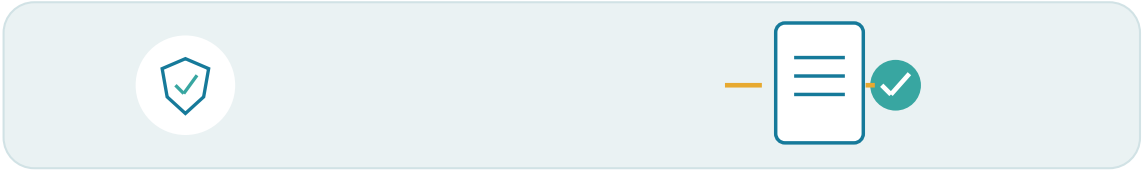
  o Information gathered in the course of professional duties (discussions with the minor, parents, or relatives, spontaneous disclosures by the minor, etc.).

  o Concerning or alarming information about the minor or their family obtained during the performance of duties.

  o The presence of physical or psychological-behavioral indicators (the latter when accompanied by statements or disclosures made by the minor or their family) suggestive of abuse or maltreatment, observed or identified in the course of professional duties.

• In cases of offenses prosecutable ex officio committed against minors by cohabiting adults or individuals related by kinship or affinity, it is appropriate for the school head to forward a copy of the report to the Public Prosecutor's Office at the Juvenile Court, which is competent to initiate protective judicial measures in civil proceedings. The report must be made in writing, even when the perpetrator is unknown, strictly adhering to factual elements and presenting all available information in a complete and comprehensive manner, without expressing evaluations regarding the credibility of the facts.

• In particular, in cases involving criminal reports of suspected abuse, maltreatment, or serious intra-family harm, the family must neither be summoned nor informed of the report, as it may fall under investigative confidentiality during the criminal investigation phase, notwithstanding possible rights of access (Ministerial Decree MPI No. 60 of 1996). A "situation of harm" is defined as a condition in which the minor experiences suffering, distress, or deprivation linked to the family or external environment that may negatively affect their developmental potential. Such situations are not always clearly distinguishable from criminal offenses. In these cases, the school head has a duty to report the situation to the head of the municipal social services. In case of doubt, notification to social services should be made concurrently with reporting to the Judicial Authority.



4) Communications with the school community must adhere to the following:

- Teachers may correspond with the school community exclusively through their institutional email address or the electronic register account provided by the employer, which reserves the right to monitor both incoming and outgoing communications.
- Teachers are prohibited from communicating with the school community, unless expressly authorized by the academic coordinator or the General Director, via personal email, personal phone, SMS, WhatsApp messages, social networks, or any other means other than the institutional tools provided. In any case, the use of official channels is always to be preferred.
- Staff members who are also parents must keep the two roles strictly separate and, in the exercise of their parental role, must continue to observe the duties of loyalty, diligence, and compliance that characterize all subordinate employment relationships.

FINAL PROVISIONS

In the event of a breach of this Code, the Gonzaga Campus Institute will take appropriate action against the employee or collaborator.

The provisions concerning disciplinary responsibility set out in applicable laws, regulations, and the CCNL Scuola AGIDAE collective labour agreement shall continue to apply.

This Code is published on the official institutional website: www.gonzagacampus.it.
Such publication on the institutional website constitutes formal notice for the following recipients: employees on permanent and fixed-term contracts, consultants, experts, and external parties who collaborate with the Institute in any capacity, including religious personnel, volunteers, and Universal Civil Service volunteers.

Palermo, 26/03/2026

The General Director

p. Vitangelo Carlo Maria Denora



