# FIDAE

# Safe School Protocol



## FOREWORD

## P1 PURPOSE OF THE PROTOCOL

This protocol was prepared by FIDAE for all Italian Catholic schools to ensure the highest level of protection for minors and promote a safe and respectful educational environment. It provides clear, practical guidance for preventing and addressing bullying, sexual and non-sexual abuse within schools, abuse within families, and other conduct that harms minors' integrity and dignity, while also ensuring appropriate staff training and protecting minors' privacy.

## P2 FUNDAMENTAL PRINCIPLES OF THE PROTOCOL

This protocol is based on the following fundamental principles:

1. The child at the centre: All actions and policies are guided by the wellbeing and safety of minors, with particular attention to their rights and needs.

2. Prevention: The first priority is to prevent risks through education, awareness-raising and ongoing training for all members of the school community (students, parents, school leaders, teachers and non-teaching staff).

3. Collaboration: Cooperation between schools, families and institutions is essential to creating a safe environment that protects minors.

4. Transparency and accountability: All procedures must be clear and transparent, comply with current regulations, and ensure accountability and ongoing monitoring.

## P3 REFERENCE DOCUMENTS

This protocol has been drawn up with particular reference to the following documents:

• Law No. 70 of 2024 on preventing and combating bullying and cyberbullying.

• National guidance on bullying adopted in 2021 by the Ministry of Education and Merit.

• Guidelines for the protection of minors in Catholic schools, adopted by the CEI School Office in 2022.

## P4 USE OF ARTIFICIAL INTELLIGENCE

Artificial intelligence, in particular OpenAI's GPT-4 technology, was used to support the preparation of this protocol. AI made it possible to review a large body of legislation and guidance quickly and ensure the protocol aligned with the latest legal requirements and recommended practices. It helped draft the document by offering suggestions and structures based on established data, while final human oversight was maintained to validate and adapt the guidance to the specific needs of Catholic schools.

## P5 FIDAE "SAFE SCHOOL" ATTESTATION

A key feature of this protocol is the FIDAE "Safe School" attestation, which may be awarded voluntarily to schools that demonstrate compliance with all the guidance in this document. The attestation formally recognises a school's commitment to protecting minors and promoting a safe, inclusive educational environment. Through rigorous checks and periodic reviews, FIDAE will ensure that attested schools maintain high standards of protection and wellbeing for all students. The FIDAE attestation does not replace certification of compliance with UNI standards or reference practices (such as PdR 42 on bullying), which FIDAE itself helped develop.

## P6 APPLICATION OF THE PROTOCOL TO STUDENTS AGED 18 AND OVER

For the purposes of this protocol, the term "minors" also includes "vulnerable young adults": students who have reached the age of 18 and remain fully covered by this document. Reaching adulthood does not, in itself, remove the vulnerability in relation to adults that underlies a safeguarding protocol.

# CHAPTER 1

PREVENTING AND COMBATING BULLYING

## 1.1 Legal references



Regardless of whether a school voluntarily adopts this protocol, its bullying prevention and response policies must comply with the following legal references:

• Law No. 70 of 17 May 2024: this law delegates powers to the Government on preventing and combating bullying and cyberbullying, with particular emphasis on preventive and educational action.

• National Guidance for the Prevention and Combatting of Bullying and Cyberbullying (2021): issued by the Ministry of Education and referenced in Law No. 70, this guidance sets out detailed primary, secondary and tertiary prevention, intervention and support measures for schools.

## 1.2 Definition of bullying and cyberbullying

Under Law No. 70, “bullying” means repeated aggression or harassment by one person or a group against a minor or group of minors, likely to cause anxiety, fear, isolation or exclusion, through oppressive acts or behaviour, pressure, physical or psychological violence, incitement to suicide or self-harm, threats or blackmail, theft or damage, insults or ridicule. This protocol uses the term bullying with the same meaning. The school must promote an accurate understanding of the term among all members of the community, starting with students and parents, to prevent misunderstandings caused by its incorrect use.

## 1.3 Appointment and duties of the anti-bullying coordinator

At the Jesuit community’s Casa della Compagnia di Gesù, known as Collegio Gonzaga, Professor Giuseppe Mannino has been appointed anti-bullying coordinator and manager of the school’s anti-bullying policies.

Professor Mannino has specific expertise and appropriate training in bullying. Each school is free to set the qualifications for this role; however, for the purposes of this protocol, the coordinator must have worked as a teacher or member of staff at the school for at least two years, ensuring familiarity with the school, its colleagues and its community. Before taking up the role, the coordinator must receive at least four hours of initial training on the law governing bullying prevention and response and on this protocol.

The coordinator:

• works with school leadership and teachers on all bullying-related matters;

• proposes and organises bullying training and refresher activities for all members of the school community;

• promotes the effective use of all prevention and response tools set out in national guidance;

• monitors cases of bullying and cyberbullying;

• coordinates the Permanent Monitoring Committee and the Emergency Team;

• promotes links with local organisations on bullying, particularly by building partnerships with local and regional coordinators and engaging relevant organisations (psychologists, law enforcement, social workers, educationalists, etc.);

• carries out any other bullying-related duties assigned by school leadership.

Each school is free to appoint one coordinator for the whole school, one for each school level, or a lead coordinator supported by one or more anti-bullying officers at each level. It is recommended that this role be assigned to teachers who already know the students and their relationships well, such as specialist teachers who work across several classes.



## 1.4 Establishing a Permanent Monitoring Committee (TPM) in each school

Under Law No. 70, every school must establish a Permanent Monitoring Committee (TPM) to review bullying data periodically, assess the effectiveness of measures taken and recommend improvements.

The TPM must include:



- the Academic Coordinator;
- the school operator or their delegate;
- the anti-bullying coordinator;
- representatives of school staff;
- student representatives, starting at lower secondary level;
- parent representatives;

Each school is free to set the criteria for selecting the teachers, students and parents who serve on the TPM.

The coordinator must document TPM meetings. They should normally take place three times during the school year and cover the following:

- first meeting: suggestions and proposals for setting the school year's anti-bullying strategy;
- second meeting: presentation of the first monitoring results from questionnaires and discussion of general dynamics within the school;
- third meeting: review of the effectiveness of the year's strategies and recommendations for the following school year.

## 1.5 Emergency Team for serious bullying cases

When a serious bullying incident occurs, the school must convene an Emergency Team made up of qualified staff ready to respond promptly. The team must include:

- the school operator or their delegate

• the Academic Coordinator;

• the anti-bullying coordinator;

• a lawyer specialising in education law;

• an internal or external school professional with psychological expertise.

Observers may be invited to meetings, including school staff and external experts. The Emergency Team must respond immediately to reports of serious bullying, ensure the victim's safety and begin appropriate procedures, which may include reporting the matter to the competent authorities. The team's case file and meeting minutes must document these stages:

• formally opening the case file;

• investigating and verifying the facts and circumstances;

• where appropriate, closing the case with reasons and notifying the parties concerned;

• recommending disciplinary measures or educational action to the competent school bodies;

• advising whether the matter should be reported to public authorities;

• monitoring the effectiveness of the actions taken;

• closing the case file.

## 1.6 Approval of the Annual Anti-Bullying Plan (PAAB)

Normally by the end of October, the school must prepare a PAAB setting out the primary prevention measures to be carried out during the school year. The plan may include:

• Training and awareness-raising: initiatives to train and inform school staff, students and parents on all aspects of bullying;

• Events and seminars: educational events on bullying for students, parents and staff, led by internal or external experts.

• Dedicated educational programmes: learning modules embedded in the curriculum to promote respect for the law and for others, including through citizenship education;

• setting up a school counselling service with a psychologist;

• identifying documents to draft or update, including the Anti-Bullying Code, School Regulations and any other document containing bullying-related information;

• reporting procedures: reviewing how bullying reports are submitted and whether the process needs to be changed;

• bullying monitoring: planning how bullying questionnaires and other monitoring methods (such as individual or group interviews) will be managed;

• any other preventive action considered appropriate to the school's characteristics and experience, also drawing on primary prevention measures recommended in national guidance.

The PAAB is approved by the anti-bullying coordinator, after staff have been informed and with the approval of the school operator and Academic Coordinator. It follows the first TPM meeting, at which proposals for these activities are gathered.

## 1.7 Approval of the Anti-Bullying Code

Each school must adopt an Anti-Bullying Code with two sections: one on bullying generally and one on cyberbullying. The Code must include:

• Definitions: detailed explanations of what constitutes bullying and cyberbullying;

• Standards of conduct: clear rules on how students should behave to prevent bullying;

• Sanctions: specific consequences for breaches of the standards of conduct, proportionate to the seriousness of the breach.

The Code's content and language must be appropriate to the students' different age groups.

The Permanent Monitoring Committee must contribute to drafting and updating the Code.

The Anti-Bullying Coordinator is responsible for providing training on the Code to all students and parents.

## 1.8 Procedure for reporting bullying

The school must establish a specific procedure for reporting bullying incidents. The school may decide how the procedure works. Gonzaga Campus has set up the email address tutelaminori@gonzagapalermo.it. In every case, the school must ensure that reports are handled confidentially, that an initial response is provided promptly, and that reports not dismissed are followed by timely action. The anti-bullying coordinator must be designated to receive reports and must be involved at every stage of their handling.

## 1.9 Training and awareness on bullying for the whole school community

Training on bullying must involve all school staff, students and parents. Each year, it must cover the relevant legislation (especially national guidance and the CEI School Office guidelines), this protocol and the school's internal procedures adopted under the law and this protocol.

## 1.10 Stakeholder satisfaction questionnaires

To monitor the school community's views on the effectiveness of anti-bullying strategies and identify potential concerns, each school must periodically give bullying questionnaires to students and parents. The anti-bullying coordinator prepares the questionnaires, in consultation with the TPM. The data must be analysed and discussed at TPM meetings, and the findings must inform updates to the Annual Anti-Bullying Plan for the following school year.

## 1.11 Managing serious bullying cases

In accordance with Lazio Regional School Office Note No. 3212 of 15 January 2024 on managing serious bullying and cyberbullying cases, the following steps apply:

Identification and reporting: School staff must immediately report any suspected bullying or cyberbullying to the anti-bullying coordinator, who must promptly notify the school operator and Academic Coordinator.

Convening the Emergency Team: After a serious case is reported or identified, the coordinator convenes the Emergency Team, comprising the school operator, Academic Coordinator, anti-bullying coordinator and any additional observers selected according to the case (including the school's lawyers, psychologist, relevant teachers, consultants and external experts). The team must also be convened when the family or student reports serious facts that the coordinator believes are unfounded, so that the reasons for this assessment are documented and appropriate communication with the families and students concerned can still take place.

Involving families and students: The coordinator promptly informs and listens to the students involved and their families, whether they are victims or alleged perpetrators.

Identifying appropriate educational and disciplinary measures: Following an initial review of identified or reported cases, the Emergency Team establishes and records in its minutes an individual intervention plan for the students involved. In the most serious cases, the plan may include educational measures, school sanctions or a report to public authorities. School sanctions are governed by the general School Regulations, including the rules on which bodies may impose each type of disciplinary measure.

Ongoing monitoring and final report: Once the Emergency Team has approved and recorded the intervention plan, the coordinator monitors the case until it can be closed, after checking that the agreed measures have been effective. The coordinator then prepares a detailed final report on the case and actions taken, to be kept in the school archives and used if further action is needed.



# CHAPTER 2

PROTECTING MINORS FROM ABUSE BY ADULTS

## 2.1 Definitions and types of abuse against minors and young adults

Abuse of minors and young adults can take many forms, each representing a serious violation of fundamental rights and human dignity. Schools adopting this protocol must understand these forms in order to establish effective prevention and response measures.

Sexual abuse: any sexual act involving a minor without their consent, including unwanted physical contact, harassment, exposure to pornographic material, or coercion into sexual behaviour through threats or manipulation. Sexual abuse is often perpetrated by people in positions of authority or trust, such as teachers, coaches or family members.

Physical abuse: forms of physical violence such as hitting, biting, burning, pushing, pulling, pinching or any other inappropriate physical contact that causes injury to a minor. It may result from excessive physical discipline or impulsive acts of violence.

Psychological abuse: behaviour that causes emotional or mental harm, including insults, humiliation, isolation, intimidation and persistent threats. It can be less visible than physical abuse but is just as harmful, deeply affecting a minor's self-esteem and emotional development.

Verbal abuse: offensive, degrading or threatening language directed at minors. Though less tangible than physical abuse, it can leave lasting emotional scars and negatively affect young people's self-image and psychological wellbeing.

## 2.2 Procedure when domestic abuse is suspected

When domestic abuse is suspected (or a minor is believed to be experiencing abuse in their personal or family environment), the school must act imme-

diately, including because its staff may be classified as public service officers and therefore subject to a duty to report, while observing the following principles:

Internal reporting: Any member of school staff who observes signs of abuse or receives a disclosure from a minor or family member must immediately inform their line manager (the school operator, Academic Coordinator or another person designated by school leadership; this may also include the anti-bullying coordinator if their remit has been extended to other forms of safeguarding).

Initial assessment: After hearing from staff informed about or involved in the reported events, school leadership must conduct an initial assessment to determine the urgency and seriousness of the situation. This step is essential to avoid delays that could further expose the minor to risk.

Documentation: All observations, reports and assessments must be carefully documented. Records must be kept confidential and accessible only to authorised staff, protecting the personal data of the minor, their family and all other people involved.

Referral to social services: If the suspicion is well-founded and concerns the family's ability to provide adequate care, school leadership must refer the case to the competent social services. All information gathered should be provided in detail to enable a prompt and effective response. This referral does not remove the duty to report if the suspected or confirmed abuse may also constitute a criminal offence.

Report to the judicial authorities: If the information concerns offences prosecutable ex officio against minors, suspected of being committed by someone in the minor's family environment, school leadership must submit a specific report to the judicial authorities, preferably with the school lawyers' support. School staff must not investigate facts that may constitute criminal offences; doing so could compromise the investigation and obstruct law-enforcement activity.

Support for minors involved: In addition to legal measures, the school must provide the minors involved in abuse cases with assistance and psychological support, involving school staff and the school's advisers.

Communication with the family: The school must inform the minor's parents or legal guardians about the information gathered and actions taken, unless they are involved in the events or disclosure would conflict with investigative secrecy or the privacy rights of third parties, such as school staff implicated in possible abuse. In all cases, communication must be handled with extreme care and in cooperation with social services and law enforcement.

## 2.3 Developing and managing a staff Code of Conduct to protect minors

The staff Code of Conduct (CdC) is an essential tool for preventing abuse and ensuring a safe environment for all students. School leadership may determine its content, but to comply with this protocol it must identify inappropriate conduct (clearly stating which behaviours are and are not appropriate in interactions with students; for example, unnecessary physical contact and situations where an adult is alone with a minor in an isolated place must be avoided) and require all staff to report any suspected abuse to school leadership immediately.

The staff Code of Conduct for safeguarding may be a standalone document or part of a broader document (such as a Code of Ethics under Model 231, staff rules or school regulations), according to each school's organisational choices. In either case, the safeguarding provisions must be clearly identified. Once approved, the Code must be managed as follows:

Confidentiality: ensure that all information relating to cases of

abuse is handled with the utmost confidentiality, limiting access to people directly involved in managing and responding to the case.

Monitoring and supervision: establish monitoring and supervision procedures to ensure that all staff comply with the Code. These may include direct observation, reviewing information from students and families through dedicated questionnaires, and periodic checks.

Disciplinary sanctions: clearly define sanctions for breaches of the Code. They must be proportionate to the seriousness of the breach and may include written warnings, temporary suspension and, in the most serious cases, dismissal. A reference to the organisation's disciplinary code may suffice if the school has adopted one.

## 2.4 Training school staff on safeguarding

Training for all school staff is essential to protecting minors. It must be comprehensive and ongoing, covering several areas:

Legal matters: staff must be informed about laws and regulations on safeguarding minors, including reporting duties and the legal consequences of failing to report. Training must cover relevant principles of civil and criminal law, sector-specific regulations, and civil and ecclesiastical authorities' safeguarding guidance. New staff who work with minors must receive training on these topics before starting work, even in a concise format or through relevant audio-visual materials.

Educational and pedagogical matters: training must cover techniques for creating a safe, protective educational environment, including strategies to promote inclusion, manage group dynamics and support students in difficulty.

Ethical and professional matters: staff must be trained in the ethical and professional principles of safeguarding, with particular attention to minors' dignity and rights. Training may include discussion of the role of Catholic schools in promoting Christian values of respect and love of neighbour.

Health and social care matters: training must cover the health implications of abuse and how to respond to protect students' health and safety, including first-aid procedures and available health services.

Psychological matters: staff must be able to identify signs of abuse and psychological distress in minors and know how to respond. Training must include psychological support techniques and strategies for providing students with effective emotional support.

## 2.5 Employer action when school staff are suspected of abuse

The employer has a crucial role in protecting minors and ensuring a safe school environment. They must take timely and effective steps to address suspected abuse while balancing student protection with employment law, in accordance with the following principles:

Precautionary measures: The employer should first consider measures such as paid suspension, a change of duties or supervision alongside other staff for the person under suspicion. These measures protect minors while an investigation is conducted, balancing safeguarding with the presumption of innocence and the requirements of the Workers' Statute governing workplace disciplinary proceedings.

Internal investigations: Conduct internal investigations and, where criminal matters are involved, work with the competent authorities to gather evidence and witness statements. Investigations must be fair and transparent and respect the rights of everyone involved.



Cooperation with the authorities: The school must cooperate actively with judicial authorities and social services to ensure a timely and effective response. It must ensure that all reports are sent to the competent authorities accurately and promptly.

## 2.6 Adopting a whistleblowing procedure

Adopting a whistleblowing procedure that complies with current law is essential to safeguarding minors in Italian Catholic schools. The procedure is based on legal principles that protect people who report concerns and ensure transparent handling of reports. Legislative Decree No. 24 of 10 March 2023 (the whistleblowing law) is central to protecting minors' rights. It transposes EU Directive 2019/1937 on the protection of people who report breaches of EU law and also applies in the education sector. Accordingly, any school employee may use the procedure to report unlawful conduct by colleagues or line managers to an independent reporting officer. That officer must conduct an internal investigation while protecting the reporter's identity.

Whistleblowing in Catholic schools not only strengthens the protection of minors but also helps create a transparent and accountable educational environment. Failure to adopt such a procedure can also expose the school to significant financial penalties. The school has appointed lawyer Natale Parisi to manage reports under Legislative Decree No. 24/2023. The reporting channel is available on the school website: www.gonzagacampus.it





# CHAPTER 3

# PROTECTING MINORS' PRIVACY

## 3.1 Compliance with the GDPR's general principles

The General Data Protection Regulation (GDPR) sets strict rules for protecting personal data within the European Union. Like any organisation that processes personal data, schools must comply with these principles to protect information about students and their parents. To comply with the GDPR, a school must:

Lawfulness, fairness and transparency

• Clearly inform data subjects (students and parents) about how their data are processed;

• collect data only for legitimate and transparent purposes;

Purpose limitation

• Use personal data only for the specific, legitimate purposes for which it was collected;

Data minimisation

• Collect only the data strictly necessary for the stated purposes;

Accuracy

• Ensure personal data is accurate and up to date;

Storage limitation

• Keep personal data only for as long as necessary to achieve the purposes for which it was collected;

Integrity and confidentiality

• Protect personal data with appropriate security measures against unauthorised or unlawful processing and against accidental loss, destruction or damage;

Accountability

• Document and demonstrate compliance with the GDPR.

## 3.2 Following the Data Protection Authority's guidance

To apply this protocol correctly and fully protect minors and their families' personal data, the school follows the specific instructions issued by the Italian Data Protection Authority for the education sector. The operational guidance below is drawn from its handbook.

1. Transparency in the processing of personal data

Schools must provide clear, understandable privacy information, written in plain language that minors can also understand. It must include:

• the purposes of processing;

• the contact details of the data protection officer;

• data subjects' rights and how to exercise them;

2. Purposes for which the school processes data

Schools may process students' personal data only for purposes related to education and training. They must ensure that the legal basis for processing complies with current law, such as the informed consent of parents or adult students.

3. Identifying people authorised to process data

The school leader (or, in a state-recognised private school, the school operator) is the data controller and determines how data is processed. Teaching and administrative staff must be properly trained and authorised to process data only for institutional purposes. The school's documents must clearly identify authorised persons and distinguish between external processors, internal processors and authorised staff. For this protocol, the school must have appointed a Data Protection Officer (DPO) under Articles 37, 38 and 39 of the GDPR.

4. Special categories of student data

Schools may process sensitive data, such as health information or religious beliefs, only when strictly necessary and with appropriate safeguards.

For example, health data may be processed to provide support to students with disabilities.



5. Limits on sharing students' personal data

Schools must not disclose personal data to third parties without an appropriate legal basis and must restrict access among colleagues to authorised staff only.

6. Exercising the right of access

Students and their parents have the right to access the personal data concerning them. The school must establish procedures to make it easy to exercise this right.

7. Cooperation with the Data Protection Authority

In the event of a privacy breach, data subjects may lodge a complaint with the Data Protection Authority. The school must cooperate with the Authority to resolve any issues.

8. Data requested at enrolment

At enrolment, schools may request only data that is necessary and relevant. They must not collect irrelevant or excessive information.

9. Personal data in students' essays and schoolwork

Teachers must handle personal data contained in students' essays and other schoolwork discreetly, protecting the confidentiality of personal information.

10. Grades and examinations

Information about grades and examination results must be handled confidentially. Grades may not be published online unless they appear in a restricted area of the electronic register accessible only to the relevant data subjects.

11. School communications

School communications must not include sensitive personal data. Schools must take measures to protect students' privacy in communications.

12. Disabilities and specific learning disorders

Health data and information about learning disorders must be handled with particular care and only by authorised staff.

13. School meal service

Data about food preferences related to health or religion must be handled confidentially, without discrimination.

14. Processing data for careers guidance and work placement

Schools may share student data to support careers guidance and employment only with the data subjects' consent and with appropriate data protection safeguards.

15. Teaching students about privacy risks

Schools must provide specific training and awareness activities on the risks of violating the privacy of classmates and staff, from smartphone use at school to the risks of cyberbullying, in line with the bullying chapter of this protocol.

16. Images from school performances and trips

The school must obtain parents' informed consent before publishing images from school activities. This is not processing based on a legal requirement for which consent is unnecessary.

17. Electronic register

The electronic register must be managed securely and be accessible only to authorised staff and data subjects. Schools must ensure that service providers comply with the GDPR.

18. Publishing student data online

Schools must exercise particular caution when publishing documents containing personal data.



The principles of data minimisation and proportionality must be respected. In all cases, parents' explicit consent is required before publishing data online where it may be accessed by a large number of third parties.

19. Video surveillance systems

Video surveillance may be installed only for specific, justified needs and must respect the rights of students and school staff. Schools installing such systems must follow the Data Protection Authority's guidance and, with regard to employees' rights, the Workers' Statute, which requires authorisation from trade union representatives or the labour inspectorate.

20. Data in research or statistical survey questionnaires

Participation in research questionnaires must be voluntary and based on clear, transparent information. Parents' explicit consent is therefore required.



# CHAPTER 4

# PROTECTING STUDENTS' SAFETY

Introduction

Student safety is fundamental in Catholic schools. A safe and secure environment is essential not only for students' physical wellbeing but also for their educational, emotional and spiritual development. School safety must be a shared priority for all staff, parents and students, based on shared responsibility and cooperation. Compliance with this protocol also safeguards minors and helps protect the school's financial sustainability in view of the serious compensation risks arising from student injuries or accidents.

## 4.1 Toy safety in early childhood settings

Early childhood settings must strictly comply with European and national toy safety rules, particularly European Directive 2009/48/EC and Legislative Decree No. 54 of 2011. Staff must ensure that all toys in use meet the following safety requirements:

Toys with detachable parts

Mechanical safety: detachable parts must be large enough not to pose a choking risk. Avoid parts smaller than 3 cm in diameter. Durability: parts must be securely attached and not easily removed by children; check them regularly. Materials: detachable parts must have no sharp edges or points that could cause injury.

Dolls

Safe materials: dolls must be made from non-toxic materials, free from phthalates and other harmful chemicals. Small components: eyes, buttons and decorations must be firmly attached and not easily removed. Cleaning: dolls should be easy to clean and keep hygienic.

Soft toys

Non-flammable materials: soft toys must be made from non-flammable materials; check the compliance label. Strong seams: ensure seams are well made and durable, with no openings through which filling could escape. No small parts: ensure there are no detachable buttons, ribbons or other parts that children could swallow.

Electric toys

CE marking: check that every electric toy bears the CE mark, confirming compliance with European safety standards. Safe batteries: batteries must be securely protected and inaccessible to children. Prefer toys with built-in batteries or child-resistant closures. Overload protection: ensure electric toys have devices to prevent overload.

Ride-on toys

Stability: ride-on toys must have a wide, stable base to prevent tipping. Moving parts: check that mechanisms are safe and have no pinch points that could trap children's fingers. Appropriate weight: toys should be light enough for children to handle but not so light that they tip over easily.

Markers and drawing materials

Non-toxic: ensure markers and other drawing materials are non-toxic and comply with European standard EN 71. Safety caps: markers must have ventilated caps to prevent suffocation if swallowed. Clear labelling: check that they are clearly labelled as safe for children.

Inflatable toys

Durable materials: use only inflatables made from durable, non-toxic materials. Safety closures: check that valves are securely sealed and inaccessible to children.



Constant supervision: inflatable toys may be used only under close supervision to prevent accidents.

Slides and climbing frames

Stable structures: ensure slides and climbing frames are firmly fixed to the ground and cannot tip over. Smooth surfaces: check that surfaces are free from splinters and sharp projections. Landing areas: soft, impact-absorbing surfaces must be provided where children land to prevent injury.

Building toys

Appropriate size: pieces must be large enough not to be swallowed. Durable materials: they must be made from strong, non-toxic materials with no sharp edges. Cleaning: they must be easy to clean and sanitise.

Board and party games

Safe components: pieces must be large enough not to be swallowed and have no sharp edges. Non-toxic materials: cards and other components must be made from non-toxic materials. Supervision: these games often require adult supervision to ensure they are used correctly.

Musical toys

Safe volume: ensure musical toys do not produce sounds loud enough to damage children's hearing. Durable materials: they must be made from impact-resistant materials. Secure parts: parts such as instrument strings must be firmly attached and not come loose easily.

Tabletop games

Non-toxic components: all game parts must be made from non-toxic materials. Smooth surfaces: surfaces must be free from sharp edges and splinters.



Supervision: these games should be used under adult supervision to ensure they are used safely and correctly.

Educational toys

Safe materials: toys must be made from durable, non-toxic materials. Appropriate size: they must be large enough not to be swallowed. Securely assembled parts: parts must be firmly attached and not easily removed.

Toy safety is the shared responsibility of all educators. Regularly checking the condition of toys and ensuring that they meet safety standards are essential to protecting children from potential hazards. These practical guidelines help teachers ensure that toys in early childhood settings are safe and suitable for everyday use. The school must also inform parents in writing that children may not bring toys from home.

## 4.2 Regular safety inspections of school equipment

School facilities and equipment, including classrooms, laboratories, gyms and sports fields, must be inspected regularly to ensure they are safe. Schools must:

• arrange annual inspections of equipment by a qualified expert, recording findings and any required maintenance;

• ensure that all sports equipment meets safety standards and is suitable for its intended use;

• ensure that laboratories have appropriate safety equipment, such as fire extinguishers, first-aid kits and personal protective equipment;

• provide school staff with specific training on the safe use of equipment and emergency procedures;

• for the purposes of this protocol, arrange an inspection at least once a year, preferably at the start of the school year, by an internal or external expert. The inspection must include at least the following:

General inspection of facilities

Structural condition: inspect classrooms, laboratories, gyms and sports fields for damage or deterioration.

and check that floors, walls and ceilings are free from cracks, holes and dangerous projections.

Sports equipment inspection

Condition and stability: check that equipment is intact, stable and working, with no worn or damaged parts. Compliance: ensure that all equipment meets current safety standards.

Laboratory inspection

Chemical safety: check that chemicals are correctly labelled and stored and that containment equipment is available. Safety equipment: check that fire extinguishers, first-aid kits and personal protective equipment are present and working.

Maintenance and cleaning

Maintenance schedule: keep a record of completed maintenance and plan any future work. Regular cleaning: ensure that equipment is cleaned and sanitised regularly.

Emergency equipment

Safety signs: check that emergency signage is present and visible. Emergency exits: ensure that exits are unobstructed and easy to access.

Staff training

Training records: maintain a record of completed training and plan refresher sessions. Emergency procedures: ensure that staff are properly trained in emergency procedures and the safe use of equipment.

Records and documentation of the annual inspection

Inspection report: prepare a detailed report including inspection findings and recommendations for any work needed. Historical archive: keep an archive of annual inspections to monitor the condition of equipment over time.

## 4.3 Administration of medication at school

Medication administration at school must be regulated to ensure student safety. The school must adopt an internal procedure consistent with guidance from education and health authorities. The procedure must include:

- a written request from parents or guardians with detailed medical instructions;
- secure storage of medication, accessible only to authorised staff;
- administration by trained staff, following medical instructions exactly;
- a record of each dose, including date, time and the signature of the staff member responsible;
- procedures for storing and administering medication during educational outings and school trips.

If students have specific medical conditions, the school must also agree detailed instructions with the family and the professionals caring for the student, covering what school staff should do and taking account of the legal risks for the school and its staff in such situations.

## 4.4 Releasing students at the end of the school day to authorised adults

Strict procedures must be followed when releasing students at the end of the school day to ensure they are handed only to authorised people. The school must:

• ask parents to provide a list of people authorised to collect their children;

• verify the identity of people collecting students by checking identification;

• train school staff on safety procedures and protocols for suspicious situations or emergencies;

## 4.5 Checking the safety of transport and accommodation for school trips

To ensure safety on school trips, schools must take rigorous measures when selecting transport and accommodation, following these requirements:

Transport

• Selecting providers: choose transport providers with all certifications required by current regulations;

• Vehicle checks: before each trip, carefully inspect the vehicles, including the seatbelts for all passengers and fire safety equipment;

• Driver qualifications: confirm that drivers have all licences and qualifications required to transport students, including an appropriate driving licence, and check for any previous accidents or traffic violations;

• Safety equipment: in addition to seatbelts, check that vehicles carry fire extinguishers, first-aid kits and emergency communication systems;

Accommodation

• Selecting accommodation: accommodation used by students must comply with all safety regulations and hold the required certificates confirming compliance with safety standards.

• Preliminary inspection: before confirming the accommodation, conduct an inspection. Assess the premises and identify potential hazards such as unprotected stairs, slippery floors or other unsafe conditions. Accompanying teachers should also inspect the hygiene and safety conditions of the rooms where students will stay.

• Emergency plans: accommodation providers must have clear emergency plans shared with school staff, including clearly marked and accessible emergency exits and suitable fire safety systems.

With support from its experts, the school must establish an internal procedure reflecting these requirements and distinguishing trips organised directly by the school from those organised through agencies. For all outings and trips, the school must also show that parents received full information about supervision arrangements and times, so that their informed authorisation may release school staff from liability for accidents or injuries during these activities.



# CHAPTER 5

CHECKLIST FOR VERIFYING COMPLIANCE WITH THE PROTOCOL

At the end of this protocol, the following checklist is provided to help verify whether the school is effectively complying with the guidance in this document and to identify appropriate improvements to its safeguarding system. FIDAE experts may also use this checklist, with any additions, when awarding the “Safe School” attestation.

CHECKLIST FOR VERIFYING COMPLIANCE WITH THE 2024 FIDAE “SAFE SCHOOL” PROTOCOL

PROTOCOL SECTION | INFORMATION AND VERIFICATION CRITERIA | COMMENTS AND OBSERVATIONS

## 1.3 Appointment and duties of the anti-bullying coordinator

Appointment of the anti-bullying coordinator

Request the coordinator’s formal appointment. Check that the appointment has been communicated to all school staff and the school community, through the school website or another appropriate channel.

Training of the anti-bullying coordinator

Review records confirming the coordinator’s training (CV, certificates, minutes, etc.). Check that training covers specific expertise in bullying and safeguarding minors.

Monitoring carried out by the coordinator

Review monitoring reports and documented prevention activities. Check that records are kept of cases monitored and actions taken.

## 1.4 Establishing a Permanent Monitoring Committee

Setting up the TPM

Review the act establishing the TPM. Check the date it was formed and the committee's membership.

Participation in the TPM

Review attendance lists for meetings. Check that all required school community groups are represented: Academic Coordinator, school operator, anti-bullying coordinator, staff representatives, students and parents.

Regular TPM meetings

Review the minutes of regular meetings. Check that meetings are held regularly and discussions and decisions are documented.

## 1.5 Emergency Team

Convening the Emergency Team in response to serious bullying incidents

Review the team's meeting minutes and case files. Check that the team was convened promptly when serious incidents occurred.



Prompt and documented action

Review records of interventions. Check that the actions taken were appropriate and timely.

## 1.6 Approval of the Annual Anti-Bullying Plan (PAAB)

Preparation and approval of the PAAB

Review the approved plan and planned activities. Check that the PAAB was shared with the teachers' council and approved by the school operator and Academic Coordinator. Check that it reflects recommendations made by the TPM.

## 1.7 Approval of the Anti-Bullying Code

Adoption of the Anti-Bullying Code

Review the approved Code and how it was distributed. Check that it is appropriate for the students' different age groups.

Training students and parents on the Code

Review training attendance records and materials. Check that all students and parents were informed.

## 1.8 Procedure for reporting bullying

Establishing a reporting procedure

Check that a procedure was established and communicated to the whole school community. Confirm that reporting methods are clear and confidential.

Timely handling of reports

Review response times and report records. Check that reports are handled promptly and appropriately.

## 1.9 Training and awareness-raising on bullying

Annual bullying training for school staff

Review training records and teaching materials. Check that training covers all requirements of current legislation and this protocol.

Awareness-raising for students and parents

Review awareness campaigns and activities. Check that events and initiatives are documented.

## 1.10 Stakeholder satisfaction questionnaires

Administration and analysis of bullying questionnaires

Review completed questionnaires, data analysis and actions taken in response to findings. Check that questionnaires were administered periodically and that results were discussed by the TPM.

## 1.11 Managing serious bullying cases

Implementation of Lazio Regional School Office Note No. 3212 of 15 January 2024

Review case management reports and individual intervention plans. Check that the measures required by the Note were properly implemented.

Documentation of interventions

Review case files and final reports. Check that all records are complete and up to date.

## 2.2 Procedure when abuse is suspected

Internal reporting and initial assessment

Review reports and assessments. Check that reports were handled according to the established procedure.

Documentation and referral to social services and authorities

Review referral records. Check that referrals were made promptly and in accordance with current regulations.

## 2.3 Developing and managing a staff Code of Conduct to protect minors

Adoption and distribution of the Code of Conduct

Review the approved Code and how it was distributed. Check, including through sample interviews, that staff know the Code and that all new employees received a copy.

## 2.4 Training school staff on safeguarding minors

Training on legal, educational, ethical, health and social care, and psychological matters

Review training records and teaching materials. Check that training took place annually and covers all areas required by the protocol.

Check that newly hired staff receive training during their initial period of employment.



## 2.5 Employer action when school staff are suspected of abuse

Handling confirmed or suspected misconduct by school staff in breach of safeguarding law and this protocol

Check whether the employer was informed of unlawful or suspected conduct by school employees relating to the protection of minors.

If so, check that facts potentially constituting a criminal offence were promptly reported to the public authorities.

Check that the employer imposed any disciplinary measures required by the collective agreement and workplace disciplinary code, while respecting employee safeguards and the disciplinary procedure set out in the collective agreement and Article 7 of Law No. 300/1970.

In cases of particularly serious violations or suspicions, check that the employer adopted appropriate precautionary measures as set out in this protocol.

## 2.6 Adopting a whistleblowing procedure

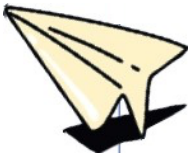
Implementation of the whistleblowing procedure

Check whether the school adopted a whistleblowing procedure bearing a verifiable date and the employer's signature.

If so, check that the procedure was provided to all employees or published on the school website.

Check that the procedure complies with the main requirements of the applicable framework (Legislative Decree No. 24/2023 and Confindustria Guidelines of 27 October 2023).

If reports have been made, interview the reporting officer to understand what investigations were conducted and what actions followed.











3.1–3.2 Compliance with the GDPR's general principles and the Data Protection Authority's handbook

GDPR compliance review

Review the school's privacy records, particularly:

• whether privacy notices for parents are adequate;

• whether consent to data processing is collected in accordance with the GDPR;

• whether all school staff have been authorised to process data;

• appointment of internal and external data processors;

Check that processors have formally accepted their responsibilities in writing.

• adoption of a processing register;

• appointment of a DPO;

Check that the appointment was also notified to the Data Protection Authority.

• privacy training for all school staff;

• appropriate handling of data breaches; • adoption of cybersecurity measures.

Cybersecurity measures.



## 4.1 Toy safety in early childhood settings

Compliance with European Directive 2009/48/EC and Legislative Decree No. 54 of 2011

Check that staff received training on toy safety rules, including through the content of this protocol.

Check that parents were informed in writing that toys may not be brought from home.

Check whether any toy-related accidents occurred and, if so, what measures were taken.

Carry out sample checks to confirm that toys on school premises comply with this protocol.

## 4.2 Regular safety inspections of school equipment

General inspection of facilities

Review inspection reports. Check that inspections were carried out by experts and documented for every area covered by the protocol. If any concerns were identified, check that appropriate measures were taken.



## 4.3 Administration of medication at school

Adoption of an internal medication procedure

Review the procedure. Check that it includes a written request from parents, safe medication storage and a record of each dose administered.

## 4.4 Releasing students at the end of the school day to authorised adults

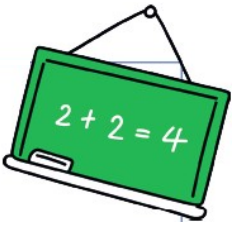
Checking procedures for releasing students

Review the list of authorised collectors and identity-checking procedures. Check that staff have been trained in safety procedures. If possible, observe dismissal to confirm that the procedure is followed.

## 4.5 Checking the safety of transport and accommodation for school trips

Transport checks

Check that the school has adopted a procedure governing transport safety checks.




Accommodation checks

Check that the school has adopted a procedure governing checks of accommodation. Sample the records for an outing or school trip.

Full information for parents

Review information provided to parents and the informed permissions they gave.

Check that parents were told how and when students would be supervised during trips.

This checklist provides detailed guidance for verifying the school's compliance with the 2024 FIDAE "Safe School" Protocol and ensuring that all safeguarding and safety measures are properly implemented.

Rome, 27 July 2024





