GUIDELINES

DEVELOPING SAFER SPACES

IN YOUTH MOBILITY PROJECTS

STEP-BY-STEP TIPS AND TEMPLATES FOR ORGANISATIONS WILLING TO DEVELOP A SAFEGUARDING POLICY FOR YOUTH MOBILITIES











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GUIDELINES

INTRODUCTION: WHY SAFEGUARDING MATTERS

Purpose of this guide

Safeguarding in youth work is about ensuring that all children, young people and young adults participating in activities are safe from harm, exploitation, neglect and abuse. In the context of youth mobilities - where young people live, travel and learn across borders - the responsibility for safeguarding becomes even more complex. Different legal frameworks, cultural expectations, living conditions, and the challenges of being away from home make it vital for organisations to adopt a clear safeguarding approach from the very beginning.

These Child and Youth Safeguarding Policy Guidelines were developed as part of the Erasmus+ project *LADDER to Inclusion (2024–2026)*. The project brings together organisations from across Europe to strengthen the capacity of youth professionals and organisations to engage highly vulnerable young people in international mobility and non-formal learning programmes. Through the development of practical methodologies, training resources, safeguarding tools, and professional partnerships, the project contributes to creating safer, more inclusive, and more accessible opportunities for young people facing multiple vulnerabilities. These guidelines serve as a practical guide for organisations seeking to establish or strengthen their safeguarding systems and embed child and youth protection principles in their everyday practice.

This guide is designed to:

- Support youth workers and organisations to create and implement safeguarding policies tailored to youth mobility projects.
- Provide practical reflection questions to help teams assess their current practices.
- Link these reflections to theory, standards, and existing resources.
- Promote a culture where safeguarding is everyone's responsibility - youth workers, group leaders, mentors, host families, volunteers, and young people themselves.

How to use this guide

- Use the reflection questions from each chapter and worksheets (Annex 1) to spark conversations in team workshops for developing or improving your safeguarding policy.
- Use the resources to fill in gaps with concrete examples.
- Combine your answers into a safeguarding policy tailored to your organisation and projects.

What is safeguarding

Safeguarding means creating an environment where young people are safe, supported, and respected in every aspect of their participation. It is broader than child protection, which focuses specifically on responding to abuse: safeguarding includes prevention, protection, empowerment and wellbeing.

In youth mobility projects, safeguarding is about:

- **Preventing harm before it occurs:** through safe recruitment, codes of conduct, risk assessments, and awareness raising.

- **Protecting participants when concerns arise:** through clear reporting channels and trained staff.
- **Promoting welfare and empowerment:** ensuring that young people are not only safe from harm but also supported to grow, learn, and contribute positively in their host communities.

Put simply: protection is how we respond when harm occurs; safeguarding is what we do every day to prevent it and to promote wellbeing.

Principles of safeguarding

Across international guidance (UNCRC, Keeping Children Safe standards, EU policy frameworks, youth work standards), some core principles consistently emerge:

1. **The welfare of the child/young person is paramount:** Every decision must be guided by what is in the best interest of the young person.
2. **Do no harm:** Organisations and youth workers must ensure that their actions, programmes, or neglect do not create or increase risks for young people.
3. **Prevention before intervention:** It is always better to prevent harm through awareness, preparation, and safe systems than to only respond after harm occurs.
4. **Empowerment and participation:** Young people should be listened to, involved in decisions about their wellbeing, and empowered to understand their rights and responsibilities.
5. **Equality and non-discrimination:** All young people have equal rights to protection, regardless of gender, ability, ethnicity, religion, or background.
6. **Accountability and transparency:** Organisations must be open about their safeguarding commitments, ensure accessible reporting systems, and review policies regularly.
7. **Shared responsibility:** Safeguarding is not the job of one person alone. It requires collective awareness and action from youth workers, group leaders, volunteers, mentors, host families, and the young people themselves.

Why safeguarding matters in youth mobilities

- **Youth vulnerability:** Being away from familiar networks increases risks such as exploitation, neglect, harassment, or poor living conditions.
- **Legal responsibility:** International frameworks like the UNCRC, EU requirements, and national child protection laws require organisations to protect participants under 18 - and to support vulnerable young adults (18–30).
- **Quality of experience:** A safe and supportive environment enhances learning, trust, and intercultural exchange, helping young people thrive personally and socially.

Complexities and challenges of safeguarding

Safeguarding in national and international youth mobilities is complex because of the diverse realities young people and organisations face.

Some challenges include:

- **Different legal and cultural frameworks:** What is acceptable behaviour in one country may be unacceptable - or even illegal - in another. Safeguarding standards must balance cultural sensitivity with universal child rights principles.

- **Vulnerabilities linked to mobility:** Young people may face homesickness, language barriers, isolation, or discrimination abroad. Living away from their families often increases dependence on youth workers, mentors, or host organisations.
- **Organisational limitations:** Not all organisations have trained safeguarding officers, clear reporting mechanisms, or the resources to implement full safeguarding systems.
- **Fear and stigma:** Young people, staff, or volunteers may hesitate to report concerns out of fear of consequences, reputational damage, or not being believed.
- **Online and digital risks:** Young people's lives extend across online spaces. Mobility projects must consider risks such as cyberbullying, online grooming, and misuse of images.

Recognising these complexities is the first step towards building realistic, context-sensitive safeguarding measures that protect young people without overburdening staff.

Reflection Questions

Use these to start discussions in your team:

- Why is safeguarding important in youth mobility projects?
- What does "safety" mean in our organisational context?
- How does safeguarding connect to our mission and values?

BUILDING YOUR SAFEGUARDING POLICY

Why to have a safeguarding policy?

A safeguarding policy is more than a document - it is your organisation's public commitment to keeping young people safe. It sets out your values, responsibilities, and systems to prevent harm and respond when things go wrong.
For youth mobility projects, a safeguarding policy provides:

- Clarity: Everyone (staff, volunteers, group leaders, participants, host families) knows what is expected of them.
- Consistency: Responses to concerns are not improvised but follow agreed, transparent procedures.
- Credibility: Donors, partners, legal guardians, and participants can trust your organisation.
- Continuity: Safeguarding practices remain even when staff or leadership change.

Recognising what you already do

Many organisations already have safeguarding practices in place, even if not formally recognised as such. Examples include collecting emergency contacts, group leaders checking accommodation, or volunteers avoiding one-to-one private meetings with minors. The process of building a safeguarding policy does not mean starting from zero. Instead, it is about:

- Capturing the practices you already use,
- Documenting them clearly, and
- Connecting them into one coherent safeguarding framework.

This both strengthens what you already do and helps identify gaps to address.

Key steps in building your policy

1. Set up a safeguarding team or appoint a responsible person

Safeguarding must have a named person (Designated Safeguarding Lead, or DSL) and ideally a small working group who are responsible for shaping the policy.

- Involve different roles: project coordinators, youth workers, mentors, and if possible, a former participant.
- Make sure the safeguarding lead has decision-making power and access to training.
- Use the "four eyes principle" - at least two people should always review and sign off drafts to avoid blind spots and ensure accountability.

→ Don't forget to use worksheets for developing Safeguarding policy in Annex 1 and Annex 2 with the Safeguarding Policy Framework!

Shared Responsibility in Policy Development: Remember that developing a safeguarding policy is not a task for one person working in isolation: this ensures accountability and diverse perspectives. Involving staff, volunteers, and even young people makes the policy stronger and better grounded in reality. Safeguarding is everyone's responsibility - and its development should reflect that from the start.

2. Assess your context and needs

A safeguarding policy must reflect your specific activities, participants, and risks.

- Identify and document existing practices (including informal ones).

- Create a profile of your participants: typical age, context and needs.
- Identify risks specific to youth mobilities (travel, accommodation, cultural differences, digital risks).
- Gather input from staff, volunteers, and young people themselves.

→ Use Worksheets 1 and 2 to guide you in assessing your context!
→ More about understanding your context and risks read in Chapter 3.

3. Define principles and commitments

Your safeguarding policy should begin with a clear statement of principles, that should align with the already existing practices and approaches of your organisation, as well as it should take into account your actual resources (human, financial, etc.).

Examples:

- *The welfare of young people is paramount.*
- *Zero tolerance for abuse, exploitation, or discrimination.*
- *Shared responsibility: safeguarding is everyone's role.*
- *Do no harm: activities must never put young people at greater risk.*
- *Respect for equality, dignity, and inclusion.*

→ Use Worksheet 4 to guide you in defining your principles!

4. Outline roles and responsibilities

Make clear who is responsible for what:

- **Organisation leadership**: approves and oversees the policy.
- **Designated Safeguarding Lead** (DSL): focal point for concerns inside the organisation, ensures procedures are followed. They are the general responsibles for safeguarding within the organisation and have the overall monitoring of the incidents happening in each project/ mobility/ activity. They can intervene on the specific project in case of abusive behaviours and when needed by the others.
- **A designated safeguarding officer (DSO) - a person who is physically present on site during a specific activity**: the person or focal group who is actually on the field during a project/mobility/activities. They are responsible for receiving concerns by the people involved in the activity and intervene according to the Safeguarding Policy.
- **Youth workers/group leaders**: uphold safe practice, report concerns, support participants.
- **Volunteers/mentors/host families**: respect the code of conduct and reporting duties.
- **Young participants**: encouraged to speak up, know their rights, and look out for each other.

→ Use Worksheet 5 to help you identify the main roles and responsibilities!

5. Develop key procedures

Your policy must include (or refer to) clear procedures, such as:

- Code of Conduct for staff, volunteers, and participants.
- Safe recruitment (screening, references, criminal record checks where appropriate).
- Responding to concerns: clear reporting pathways, confidentiality rules, and external referral points.
- Safe activities and environments: risk assessments for travel, accommodation, online activities, etc..
- Whistleblowing and accountability mechanisms.

Recognising existing safeguarding practices: It is important to remember that many organisations already have safeguarding practices in place, even if they are not formally recognised or written down as such. For example: group leaders check accommodation before young people move in; volunteers know not to be alone in private with a minor; emergency contacts are always collected before a mobility.
These informal practices are part of safeguarding. The next step is to acknowledge, document, and connect them within a coherent safeguarding policy. Doing so makes expectations clearer for everyone, ensures consistency across projects, and demonstrates to partners, legal guardians, and funders that your organisation takes safeguarding seriously. Rather than starting from scratch, building your policy can be seen as a process of capturing what you already do well, filling in gaps, and aligning it with national laws and international standards. This approach also helps staff and volunteers recognise their own contributions and encourages ownership of the safeguarding culture.
→ Use Worksheets 3 and 6 to figure out what you already have!

A **Code of Conduct** is often a separate, more detailed document that sets out expected and unacceptable behaviours for staff, volunteers, group leaders, mentors, and participants. It should always make clear reference to the safeguarding policy, so the two documents are coherent and mutually reinforcing. For example, if your safeguarding policy stresses "do no harm" and "zero tolerance for discrimination," the Code of Conduct must reflect these same values in daily practice (e.g., boundaries in communication, respectful behaviour in shared spaces, safe online interactions).
→ See Annex 3 for more detailed guidelines and sample of Code of Conduct.

Safe recruitment: Adopt clear procedures for vetting staff, leaders, and volunteers. This may include references, background checks, or declarations, depending on your national legal framework.
→ Read more about safe people and recruitment in Chapter 4.

Reporting and responding: Create simple, accessible reporting pathways for staff, volunteers, and participants. Clarify:

- Who to contact (DSL or DSO),
- How reports are documented,
- How confidentiality is respected but not promised absolutely.

→ Read more about reporting and responding in Chapter 5.

Safe activities and environments: Ensure accommodation, travel, activities, and online spaces are risk assessed and age appropriate.
→ Read more about risk prevention in Chapter 6.

Accountability and whistleblowing: Provide channels to raise concerns about organisational practice itself, not only individual

Ensure coherence across documents: Safeguarding documents should never contradict each other. Your safeguarding policy, Code of Conduct, recruitment policy, data protection procedures, whistleblowing policy, and equality/inclusion policies must follow the same values and logic. They also must be aligned with the legal hierarchy of your country, ensuring compliance with national laws and statutory guidance.

Account for international legal contexts: In international youth mobilities, safeguarding cannot stop at your own borders. Your policy and practices must take into account both your national regulation and those of your partners/host countries. For example:

- Sleeping arrangements: in some countries, minors may not legally share rooms with adults.
- Drinking age: varies across Europe; activities should respect the stricter law to avoid liability.
- Age of consent: differs between countries, which can have implications for safeguarding responsibilities and serious legal consequences.

If these legal contexts are ignored, your organisation risks legal consequences and insurance not covering incidents. Always clarify and include these issues in preparation with partners.

6. Make the policy accessible

- Use clear, simple language.
- Provide a youth-friendly summary for participants.
- Translate if needed for international groups.
- Display key contact details (DSL, emergency numbers) in visible places.

→ See example of a child friendly version of Safeguarding policy in list of resources (Chapter 8).

7. Review and update regularly

Safeguarding is not "set and forget." Policies should be:

- Reviewed annually (or after major incidents/changes in law).
- Updated with feedback from staff, volunteers and participants.
- Monitored through training, supervision, and evaluation.

→ Read more on monitoring in Chapter 7.

Principles for writing a good policy

- Clarity over length: short, practical, and easy to follow.
- Reflective of real practice: based on your actual activities, not copy-paste text.
- Inclusive: developed with input from staff, volunteers, and young people.
- Legally aligned: with both national law and international frameworks.
- Connected: integrated with other organisational policies (e.g., risk management, equality, data protection).

Reflection Questions

- Who in our organisation already carries safeguarding responsibilities (formally or informally)?
- How can we make the safeguarding lead visible and accessible to young people
- What risks have we encountered in past projects?
- How do we currently prepare for emergencies or incidents?
- Where do young people in our projects feel most vulnerable?
- Which safeguarding principles best express our values and approach?
- Do our current procedures make it clear and easy for anyone (staff, volunteers, participants) to report a concern?
- How often do we review our safeguarding practices and who is involved in that process?

UNDERSTANDING YOUR CONTEXT AND RISKS

Why context matters

Every safeguarding policy must be rooted in the realities of your organisation and projects. Youth mobilities are diverse: some involve under-18s on short-term exchanges, others involve young adults volunteering abroad for months. Risks and protective factors look very different depending on the age of participants, local culture, living arrangements, and support systems.

A good safeguarding policy starts with understanding:

- Who your participants are (age, vulnerabilities, diversity).
- Where and how activities take place (travel, accommodation, online).
- Who is responsible for them (youth workers, volunteers, host families, partners).

By identifying your context and risks clearly, you can design policies and procedures that are realistic, effective, and easy for everyone to follow.

Typical risks in youth mobilities

Risks can vary depending on the nature of the project, but common categories include:

- Accommodation and living conditions: Inappropriate or unsafe housing (e.g., minors sharing rooms with adults, lack of privacy, unsafe facilities).
- Travel and logistics: Young people traveling without adequate supervision, unclear emergency contacts, unsafe local transport.
- Health and wellbeing: Homesickness, mental health struggles, stress, or lack of access to healthcare.
- Peer dynamics: Bullying, harassment, or exclusion in intercultural groups.
- Adult/participant relationships: Abuse of power, blurred boundaries, or inappropriate relationships.
- Online and digital risks: Cyberbullying, grooming, unsafe sharing of images or personal data.
- Cultural and legal differences: Different norms on alcohol, curfews, physical contact, or age of consent. Ignoring these can create not only safeguarding risks but also legal or insurance problems.

Safeguarding policies must be clear about what they mean by violence, abuse, and harm. This ensures everyone – staff, volunteers, and young people – share the same understanding.

- Violence refers to any intentional act that causes, or has the potential to cause, physical, emotional, or psychological injury.
- Abuse includes physical, sexual, emotional, or economic mistreatment, neglect, or exploitation by individuals or institutions.
- Harm is any negative impact on a young person's wellbeing, health, dignity, or development – whether through deliberate actions or through negligence (failure to act when a risk was known).

It is important to remember that harm can be invisible: bullying, humiliation, neglect, or unsafe online practices can be just as damaging as physical abuse.

- **PHYSICAL ABUSE** involves hitting, beating, pushing, punching, poisoning, burning or scalding, drowning or suffocating.

- **EMOTIONAL/PSYCHOLOGICAL ABUSE** can be verbal and non-verbal humiliation, intimidation, threats, terrorising, restrictions on freedom of action, denigration, unfair accusations, discrimination, ridicule and other hostile or rejecting attitudes towards the child or young person. If the emotional abuse is repetitive and continuous, it leads to affecting their personality structure, cognitive development, adaptation ability, perceptions.

- **SEXUAL ABUSE** represents the engagement in any form of sexual behaviours that are:
  - non consensual
  - below the sexual consent age, according to the national legislation of the sending country of the participants. If the laws of the countries have different consent ages, the highest one will be taken into consideration.

This category can include:
  - sexual molestation, exposing the child or young person to insults or language with a sexual connotation, as well as touching erogenous areas with the hand or by kissing.
  - situations that lead to the satisfaction of the sexual needs of an adult or, or of another child/teenager who is in a position of power or in a relationship of trust with the victim;
  - attracting or forcing the child/young person to commit obscene actions;
  - exposing the child/young person to obscene material or providing them such materials;
  - not respecting the child/young person consent for being touched or engaged in intimate age appropriate behaviour;
  - sexism or sexist actions;
  - sexual harassment: remarks with a sexual connotation, such as recounting sexual episodes, naughty comments, remarks with a sexual connotation, for example, about clothing, and appearance and calling a person sexualized nicknames, as well as "jokes" or sexual mockery.

- **ONLINE HARASSMENT** for example, using phones, instant messaging, e-mail, chat rooms or social media networks to harass, criticise, threaten, intimidate, mock and ridicule someone. It includes "sexting" online, for example when a person shares sexually explicit, nude or semi-nude images or videos of themselves or with other people or sends sexually explicit messages.

- **NEGLECT** in the situation of residential child and youth mobilities, children could be at risk of neglect if the host, accommodation, food conditions provided for them during the project are not suitable or age appropriate, are endangering their physical stability or their health. For example, the accommodation provided to them is not safe or healthy, the food is not enough or not appropriate, there is not appropriate access to hygiene facilities, physical activities involve high risk of accidents and there is no protection or intervention mechanism offered, children do not have access to medical care when needed, etc.

- **FINANCIAL ABUSE** involves the inappropriate use, control or exploitation of a child or young person's financial resources, assets or opportunities. This may include:
  - denying them access to their own money or resources,
  - manipulating them to give away money, gifts, or property,
  - forcing them to work without fair compensation,
  - misusing allowances, scholarships, stipends or project-related funds meant for their benefit,
  - exploiting their personal data for financial gain (e.g., identity theft, online scams).

Financial abuse undermines a young person's independence, security, and ability to meet their basic needs, and can leave long-lasting effects on their wellbeing and development.

- **SELF-NEGLECTING** refers to situations where a child or young person persistently fails to attend to their own basic physical, emotional, or health needs, in a way that endangers their wellbeing or development. This may manifest as:
  - not maintaining personal hygiene, nutrition, hydration, or sleep,
  - refusing necessary medical care or medication,
  - engaging in risky or harmful behaviours that disregard their own safety,
  - consistently ignoring their own physical or emotional needs despite having the capacity to address them.

Self-neglect differs from neglect by others: it arises from the young person's own actions or omissions rather than from the failure of a caregiver. However, it is often linked to underlying emotional distress, trauma, or mental health challenges, and requires timely support and safeguarding interventions.

- **GROOMING** is when an adult (or older peer) deliberately builds a relationship of trust with a child or young person in order to manipulate, exploit, or abuse them. It can happen in person or online.
  - Starts with attention, gifts, or special treatment.
  - Involves secrecy, isolation from others, and creating dependency.
  - May gradually introduce sexualised talk, images, or behaviour.
  - Often hard for the victim to recognise, because it feels like care or friendship.
  - Grooming destroys trust, increases vulnerability, and can lead to long-term psychological and emotional harm.

> ***By naming these forms explicitly, organisations can help staff and participants recognise risks early and respond appropriately.***

Potential risks or where do "grey zones" arise?

In youth work, safeguarding risks do not arise only from obvious misconduct or intentional harm. More often, they emerge in so-called "grey areas" – situations where boundaries are unclear, power imbalances exist, and actions are guided by individual judgement rather than a shared understanding of appropriate practice. Because youth work is built on trust, relationships, and informal interaction, professionals frequently encounter situations that require careful consideration. These may include one-to-one conversations with young people, physical contact such as hugs or comforting gestures, communication outside organised activities through social media or messaging applications, the development of particularly close relationships with individual young people, or the use of humour, personal stories, and informal language.

The challenge is that potentially harmful situations rarely appear suddenly. Instead, they often develop gradually and may not be recognised as problematic at the time. Even when actions are motivated by good intentions, the absence of clear boundaries can create confusion, dependency, or discomfort for young people. It can also leave staff and volunteers uncertain about whether they are acting appropriately, result in inconsistent responses to similar situations, and make it difficult for organisations to protect both young people and those working with them. Importantly, unclear boundaries may also create opportunities for grooming and other forms of abuse to occur unnoticed.
When assessing safeguarding risks, it is essential to focus not only on intentions but also on the impact of actions and the power dynamics involved. Child and Youth Safeguarding Policies play a crucial role in making these grey areas visible, providing a common framework for discussion, and helping organisations establish clear, consistent, and safe practices for everyone involved.

Some young people may be at higher risk during mobilities, for example:

- Those under 18.
- Young people with disabilities or special educational needs.
- Participants with limited language skills.
- Young people from marginalized or minority backgrounds.
- Highly vulnerable youth (e.g., facing multiple exclusion factors such as poverty, discrimination, or trauma).

Recognising these factors allows you to put additional safeguards in place (e.g., supervision ratios, tailored support, accessible reporting).

Minors and young adults – including highly vulnerable youth

Safeguarding in youth mobilities must protect both minors and young adults.

- Minors (under 18) are legally children and must always receive protection in line with the UNCRC and national child protection laws.
- Young adults (18–30) are legally adults, but many still face vulnerabilities. Young adults can be less experienced, isolated, or marginalised – and therefore still at risk of harm.
- Highly Vulnerable Young People (HVYPs) may be legally adults but face overlapping risk factors such as poverty, disability, migration status, discrimination, or trauma.

This is why safeguarding policies should explicitly state that they apply to both minors and young adults. Protecting only those under 18 is not enough – young adults, especially HVYPs, also need safe environments, clear reporting channels, and supportive relationships during mobilities.

Reflection Questions

- What are the main safeguarding risks in our typical projects?
- Which groups of young people might need additional protection or support?
- How do we take account of both our national regulations and our partners' when planning mobilities?
- How do we ensure our risk assessments are updated before every project?
- Do we have systems for collecting feedback from participants about risks they experience?

RISK PREVENTION IN YOUTH MOBILITIES

Youth mobilities (exchanges, volunteering, training abroad) bring unique risks: unfamiliar cultures, shared living spaces, travel, and online exposure. Proactive risk assessments help organisations create safer experiences before problems arise.

What is risk management?

Risk management is the process of identifying, assessing, and reducing risks that may affect the safety and wellbeing of participants. In safeguarding, it means asking: what could go wrong, how likely is it, and how do we prevent or respond if it happens?
A risk management approach ensures that youth mobilities are not only enriching and fun, but also safe. A good safeguarding policy treats risk management as a preventive strategy, ensuring that young people can take part in international and national activities in ways that are safe, dignified, and empowering.

Building a risk management strategy

Every organisation working with youth mobilities should have a risk management plan or strategy that:

- Carries out risk assessments for travel, hosting, accommodation, activities, and online communication.
- Prepares for emergencies, including health crises, misconduct, natural disasters, or cultural misunderstandings.
- Includes supporting policies when relevant (e.g. First aid policy - covering both physical and psychological first aid; Code of Conduct)

These documents must be coherent and consistent with the safeguarding policy, and aligned with both national law and the legal frameworks of partner countries.

Domains of risk prevention

In order to effectively prevent risk, it is essential to consider the following nine areas of risk, which have been shaped by the reality of youth mobility.

1 Participants

Select, prepare, and support young people according to their age, language, culture, and vulnerabilities. Consider the impact of gender roles, modesty expectations, or local norms around physical contact; also the religious or cultural practices that might affect young people's participation. Don't forget that highly vulnerable young people might be extra vulnerable due to age, disability, discrimination, or lack of independence. Think about the possible risks for legal adults (18–24) who are still at risk and require adapted precautions.

Safeguarding is most effective when young people are actively involved. Invite participants to:

- Share what risks they worry about in pre-departure training.
- Help shape rules (e.g., group agreements on digital safety).
- Take responsibility for peer safety (buddy systems, check-ins).

This builds ownership and makes risk prevention a shared responsibility.

2 Staff and volunteers
Ensure safe recruitment, training, and supervision of adults with safeguarding responsibilities. Group leaders, mentors, and host families must be equipped to identify and respond to risks:

- Receive training in safeguarding and emergency procedures.
- Understand cultural contexts and how they affect young people's safety.
- Be briefed on vulnerabilities of minors and HVYPs.
- Know what counts as an emergency - supported by fact sheets (e.g., health crisis, harassment, missing participant).

A safe mobility project requires more than a first aid kit. Staff and leaders should be trained in both - the Physical first aid (basic responses to injuries or health crises) and Psychological first aid (listening with empathy, reassuring participants, and connecting them to professional help if necessary).

3 Programme and activities
Design age-appropriate activities and conduct risk assessments, especially for sports or outdoor challenges. Think about possible risks regarding high-risk sports or outdoor activities without safety measures; lack of supervision ratios; peer bullying or exclusion during group activities.

4 Accommodation and hosting
Check safety, privacy, food quality, hygiene, and access to healthcare. Be aware of unsafe housing or fire risks; lack of privacy (e.g., minors sharing with adults); inadequate food, hygiene, or medical access. "Safe hosting" means providing environments that protect dignity, wellbeing, and safety. This includes:

- Suitable living conditions: safe, clean, age-appropriate housing.
- Food: enough, appropriate to dietary needs, culturally sensitive.
- Privacy: separate facilities as appropriate by age and gender.
- Medical care: access to healthcare and mental health support if needed.

Host organisations should pre-check facilities, use a minimum standards checklist, and document the inspection.

5 Travel and transportation
Vet providers, ensure supervision during transfers, and maintain emergency contacts. Think about the possible risks: young people separated from the group; unsafe local transport or transfers; lack of emergency contacts.

6 Subcontractors
Screen and contract external providers with safeguarding clauses.

7 Equipment and facilities
Ensure spaces and tools meet safety standards.

8 Group culture
Build an inclusive environment that respects diversity and prevents bullying or discrimination. Remember that group culture must be designated also to prevent online

and digital risks like cyberbullying, sexting, grooming, sharing of inappropriate or sexualised images and other unsafe use of social media during mobilities.

9 Administration
Ensure proper documentation, insurance, parental consent forms, and emergency contact details are in place.

Reflection Questions

- Do we have a written risk management plan that includes travel, accommodation, activities, and digital spaces?
- Do our first aid procedures also cover psychological first aid?
- How do we ensure hosting conditions are safe and dignified?
- Do we involve young people in identifying risks and building solutions?
- How are leaders and mentors trained and supported to manage risks?
- Do we consider cultural norms affecting safety?

SAFE PEOPLE AND RECRUITMENT

Why people matter

Policies and procedures alone cannot keep young people safe - it is the people who make safeguarding real. Every youth worker, volunteer, group leader, mentor, host family, or staff member who interacts with young people becomes part of the safeguarding system. For this reason, recruitment and ongoing training are central to creating a safe environment in youth mobilities.

Safe people are:

- Properly recruited, with background checks and references.
- Clearly informed of their roles and responsibilities.
- Guided by a Code of Conduct and safeguarding induction.
- Supported with regular training and supervision.

Recruitment for safeguarding

Clear role descriptions

Every position, whether staff, volunteer, or host, must have a written role description. This ensures:

- Clear expectations of duties and limits of responsibility.
- Understanding of safeguarding responsibilities (e.g., supervision, reporting, respecting boundaries).
- Transparency for the candidate and the organisation.

Application and reference checks

- Collect applications in writing (not just informal invitations).
- Ask candidates to declare any previous safeguarding concerns.
- Request at least two references, ideally from previous work with young people or in a professional setting.
- Contact referees directly - do not rely on written statements only.

Police / criminal record checks

Where possible and legally permitted, require a police check or certificate of good conduct (e.g., in the EU, extract from criminal records).

- For international mobilities, checks may differ across countries - always apply the stricter option available.
- If police checks are not possible (e.g., for host families), reinforce with stronger reference checks and interviews.

Remember: police checks are not enough on their own. They must be part of a wider recruitment process that considers values, behaviour, and safeguarding awareness.

Code of Conduct and induction

All staff, volunteers, and group leaders must sign the Code of Conduct as part of their contract or volunteer agreement.
Induction must include:

- Introduction to the organisation's safeguarding policy and values.

- Roles and responsibilities for safeguarding.
- Reporting procedures and contact details of safeguarding leads.
- Expectations for appropriate behaviour and professional boundaries.

This ensures that safeguarding is not an optional add-on, but a core condition of involvement.

Reflection Questions

- How do we recruit staff, mentors, and volunteers?
- Do our recruitment processes emphasise safeguarding at every stage?
- What checks or references are realistic in our context?
- How do we check references and police records in both national and international contexts?
- Do all staff and volunteers sign a Code of Conduct and receive safeguarding induction?
- How do we prepare and train people for safeguarding responsibilities?
- How often do we provide refresher training, and is it adapted to youth mobility risks?
- Do we create opportunities for staff to reflect on dilemmas and receive support?

REPORTING AND RESPONDING

Why clear procedures matter

Safeguarding is only effective if everyone knows what to do when something goes wrong. Even with good prevention, safeguarding concerns can arise. A clear reporting and response system ensures young people and staff know where to turn, who to trust, and what happens next. It protects both individuals and the organisation.

In youth mobilities, young people may be far from home, in unfamiliar settings, and unsure who to trust. A clear reporting and responding framework ensures:

- Young people feel safe to raise concerns.
- Staff and volunteers act consistently and appropriately.
- Incidents are addressed at the right level - whether internally or with external authorities.
- Organisations remain accountable to participants, families, partners, and funders.

How concerns arise

You may find out about a safeguarding issue in different ways:

- Direct disclosure: a young person tells you they are being harmed.
- Observation: noticing changes in behaviour, mood, or appearance; seeing unsafe conditions.
- Third-party report: another participant, parent, partner, or community member raises a concern.
- Online signals: inappropriate messages, images, or bullying in digital spaces.

Staff and volunteers should never wait for "proof" before acting. A concern is enough to trigger the reporting process.

Responding to concerns

General Principles

- Stay calm, listen, and reassure.
- Never promise confidentiality; explain that information must be shared with those who can help.
- Record the facts as soon as possible: who, what, when, where.
- Always follow the organisation's reporting pathway.

Levels of Response

Not every concern requires the same response. It is helpful to think in terms of different levels of problematic behaviour:

1. **Low-level / poor practice**

Example: A leader repeatedly arrives late to supervision duties.
Response: Address internally with supervision, guidance, or training. Document the issue.

2. **Concerning behaviour / potential safeguarding risk**

Example: Bullying among participants, a volunteer ignoring boundaries.
Response: Report to the Designated Safeguarding Lead (DSL). Investigate internally, Involve sending/hosting organisations as needed. Document outcomes.

3. **Abusive behaviour/ Serious abuse / criminal offence**

Example: Sexual abuse, physical assault, child exploitation.
Response: Immediate escalation to safeguarding lead (DSL), police, or child protection services. Ensure the young person is safe. Inform the sending organisation and parents/guardians if appropriate.

Appropriate behaviour requires no safeguarding intervention; low-level poor practice may fall within the concerning behaviour spectrum and should be addressed early to prevent escalation.

Always apply the stricter national law (host or sending country) when deciding whether to escalate to authorities.

Reporting procedures

Internal reporting

- All concerns must be reported to the Designated Safeguarding Lead (DSL) or focal point.
- If the concern involves the DSL, use the deputy contact or escalate directly to leadership.
- Use a standard form (incident/concern report). Keep factual, avoid assumptions.

📎 ***Example - CISV International Incident Report Form*** *(IRF):*
CISV requires any incident involving safeguarding, serious accidents, or breaches of code of conduct to be reported within 72 hours using a standard Incident Report Form. This form includes:

- *Details of the incident (who, what, when, where).*
- *Actions taken immediately.*
- *Next steps planned.*
- *Confirmation that safeguarding focal points and relevant external authorities have been informed.*

This model ensures transparency, accountability, and consistent reporting across national associations.

Reporting to other organisations

In international mobilities, concerns must also be reported across the partnership:

- Hosting organisation: responsible for immediate response and safety on site.
- Sending organisation: must be informed promptly, especially when minors are involved.
- Partners/funders: some programmes (e.g., Erasmus+, European Solidarity Corps) require notification of serious incidents.

Boundaries of confidentiality

Confidentiality means that group leaders, safeguarding responsible people or any other staff member that has information about an incident, cannot pass on the information without the clear consent of the child or young person. They can talk about the incident anonymously or not, but only with the consent of the person.

The boundaries of confidentiality are:

- if the situation strongly endangers the physical and/or psychological health of the person (over 18 years old).
- if the safeguarding incident is an abusive situation that involves a minor.

In any case, reporting further must be done with respect for the dignity of the person(s) and avoiding retraumatizing. All steps need to be clearly communicated to the person(s) concerned.

Communication and feedback

- Inform the reporter: acknowledge receipt and explain what will happen next.
- Support the young person: ensure they feel safe and listened to.
- Share information responsibly: only with those who need to know.
- Close the loop: follow up with staff, sending/hosting organisations, and, where appropriate, families/guardians.

Reflection Questions

- If a young person had a concern, who would they talk to first?
- Do all staff, volunteers, and participants know how to raise a safeguarding concern?
- Do all staff/volunteers know who the safeguarding focal point is?
- Do we have clear guidance on which issues are handled internally and which are escalated externally?
- How do we ensure timely reporting to both sending and hosting organisations?
- What is your process for documenting a concern?
- Do we use a standard incident form that supports transparency and accountability across borders?
- How can you make reporting safe and confidential?
- How do you balance confidentiality with the need to escalate serious issues?

IMPLEMENTATION AND MONITORING

Why implementation and monitoring matter

A safeguarding policy only has value if it is put into practice, lived by everyone in the organisation, and regularly reviewed. Implementation ensures that safeguarding principles are embedded in daily activities. Monitoring ensures that the policy stays relevant, effective, and trusted by young people, staff, and partners.
In youth mobilities, where diverse groups and cross-border contexts are involved, strong implementation and monitoring are essential for maintaining consistent standards of safety and care.

Communication

A safeguarding policy should be transparent, accessible, and visible:

- Share widely with staff, volunteers, group leaders, mentors, partners, participants, and families.
- Provide a youth-friendly summary for participants.
- Translate or adapt into accessible formats if needed (e.g., simple language, pictograms).
- Display safeguarding contact details (DSL, emergency numbers) in common areas and digital platforms.

The policy must not remain a hidden document in leadership files - it should be part of the everyday culture.

Ongoing training and support

Initial training

Before starting, all people in safeguarding roles should receive training on:

- Recognising signs of abuse and harm.
- Responding to concerns and disclosures.
- Cultural and legal differences in mobilities (e.g., drinking age, age of consent).
- Boundaries in online and offline interactions.

Regular refresher training

Safeguarding is not static - risks and standards evolve. Therefore, organisations should provide refresher training (annually if possible). In the training include case examples from past projects. Proactively update staff on any changes in law or policy and create space for reflection and peer learning (e.g., in leaders' meetings).

Supervision and capacity building

Encourage staff and volunteers to share experiences and dilemmas in a safe space. Supervisors should regularly check in with staff and volunteers about safeguarding dilemmas. Encourage a culture of openness where raising concerns is welcomed, not feared and provide access to external advice if needed (e.g., child protection hotlines).
When possible, organize specialised trainings to provide targeted learning for safeguarding leads, group leaders, and mentors (e.g., recognising abuse, managing disclosures, handling digital risks).

Resources

Implementation requires commitment of resources:

- Time: allocate time for training, monitoring, and reviews.
- People: ensure safeguarding leads are trained, supported, and resourced.
- Funding: budget for safe recruitment checks, safeguarding materials, training sessions, and emergency support measures.
- Tools: provide templates for incident reporting, risk assessments, and feedback collection.

Mechanisms for monitoring

Incident reviews

- Analyse safeguarding incidents and near misses systematically.
- Identify lessons learned and adapt procedures accordingly.
- Share outcomes with staff and, where appropriate, with partners and participants.

Feedback systems

- Collect feedback from participants, staff, volunteers, and partners about how safe they felt and whether safeguarding systems worked.
- Provide anonymous feedback channels (e.g., surveys, suggestion boxes).
- Involve young people in reviewing the policy to ensure their perspectives are reflected.

Policy reviews

- Conduct annual reviews of the safeguarding policy.
- Review earlier if a serious incident occurs or laws change.
- Use the "four eyes principle" (minimum two people) for reviewing documents and procedures.
- Ensure both sending and hosting organisations are involved in mobility-related reviews.

Reflection Questions

- How do we communicate the safeguarding policy to all relevant groups?
- Are all staff and volunteers receiving induction and refresher training?
- Do we have the resources needed to properly implement and monitor safeguarding?
- How do we collect and act on participant feedback about safety?
- How often do we review and update the policy?

RESOURCES AND TOOLS

Resources for further exploration

- Handbook on the inclusion and support of highly vulnerable young people in international non-formal learning programmes (2025) Available at: https://elmenyakademia.hu/en/ladder-en/
- Printable infographics on inclusion and support of highly vulnerable young people (2025) Available at: https://elmenyakademia.hu/en/ladder-en/
- SALTO European Solidarity Corps "Safeguarding Guidelines: Developing and enhancing Safeguarding Policies in organisations participating in the European Solidarity Corps Programme" Available at: https://www.salto-youth.net/downloads/4-17-4627/Safeguarging+Guidelines_SNACvol.pdf
- Keeping Children Safe "The International Child Safeguarding Standards" Available at: https://www.keepingchildrensafe.global/international-child-safeguarding-standards/
- National Youth Agency, UK "Safeguarding Standards for the Youth Sector" (2025) Available at: https://nya.org.uk/wp-content/uploads/2025/04/NYA_Safeguarding-Standards-for-the-Sector-April2025_update.pdf.pdf
- National Youth Agency, UK "Safeguarding Standards Self-Audit Tool" Available at: https://nya.org.uk/safeguarding-hub/self-audit-tool/
- National Youth Agency, UK "Safeguarding & Risk Management Hub" Available at: https://nya.org.uk/safeguarding-hub/
- National Youth Agency, UK "The Role of Designated Safeguarding Lead. Guidance." (2023) Available at: https://nya.org.uk/wp-content/uploads/2024/02/The-Role-of-a-Designated-Safeguarding-Lead-1.pdf
- National Youth Agency, UK "Youth workers' role in safeguarding and violence prevention" (2026) Available at: https://nya.org.uk/research-and-reports/safeguarding-and-violence-prevention/
- United Nations Convention on the Rights of the Child. Available at: https://www.unicef.org/child-rights-convention

Samples and examples of safeguarding policies

- National Youth Council of Ireland (2024) Youth-Friendly Child Safeguarding Policy. Available at: https://www.youth.ie/documents/youth-friendly-child-safeguarding-policy/
- Ladder: Child and Youth Safeguarding Policy - Sample for organizations working with youth mobilities (2026) Available here as Annex 4
- PILnet Safeguarding Tools for Nonprofits. Available at: https://www.pilnet.org/resource/safeguarding-tools-for-nonprofits/
- CISV International Incident Report Form (IRF) – model for international reporting (publicly available at CISV International safeguarding resources). Available at: https://cisv.org/resources/risk-management-safeguarding/

ANNEXES

ANNEX 1

WORKSHEETS FOR THE DEVELOPMENT OF A CHILD SAFEGUARDING POLICY

1. Our organisation's context and work with children/young people

Objective: To identify the reality in which your organisation operates, so that the policy is relevant rather than merely formal.

1.1. Basic information

- Organisation name:
- Field of activity:
- Main activities in which children/young people participate:

1.2. Target group

Age groups of children and young people (please tick):
□ up to 12 years
□ 13–17 years
□ 18+ young people
Are there young people with increased vulnerability? (e.g. social risks, disability, migration experience, mental health issues, etc.)

1.3. Forms of work

Please tick the option that applies to you:
□ regular organised group sessions
□ informal / unstructured time spent together
□ individual support / mentoring
□ day activities
□ events / overnight camps
□ outdoor activities
□ digital activities
□ international mobilities
□ other (please specify): _____

2. Potential risks and 'grey areas' in our work

Objective: To identify situations where boundaries and professional roles may be unclear.

2.1. Where might "grey areas" arise in our work?

Examples (tick and add):
□ one-to-one conversations between adults and young people
□ activities involving physical contact
□ establishing close emotional contact with a young person
□ communication on social media
□ informal language, sharing personal stories
□ working outdoors / without other adults
□ both adults and minors take part in activities at the same time

□ participants may have changing roles – sometimes they are activity leaders, at other times participants (or former participants become group leaders / mentors, etc.)
□ international groups, multicultural environment
□ activities involving travel (participation in international exchanges, etc.)
□ other situations: _____

2.2. In which situations might our staff/volunteers feel unsure or not know how to act?
Briefly list examples from your own experience

3 Unwritten practices: how do we currently operate?

Objective: To identify what is actually happening, even if it is not set out in documents

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3.1. How do we usually respond if:

- a young person reveals personal or distressing information?
- a conflict or inappropriate behaviour arises (between young people; between an adult and a young person)?
- a staff member/volunteer is unsure what to do in a situation where a child's safety is at risk?
- you need to prepare for a potentially complex or risky activity?

3.2. Who makes decisions in such situations?
□ a specific person
□ the head of the organisation
□ depends, we assess the situation and decide
□ not clear

4 Our organisation's core principles and commitments

Objective: To formulate the values on which the policy will be based.

4.1. What principles does your organisation wish to emphasise?
Tick and add:
□ the best interests of the young person are a priority
□ zero tolerance of violence
□ do no harm – do not create additional risks
□ respect, equality, inclusion
□ shared responsibility for safety
□ others:

4.2. Formulate 3–5 commitment statements in your own words
(e.g., "Our organisation commits to…")

5 Roles and responsibilities within the organisation

Objective: To clearly define who is responsible for what.

5.1. Does the organisation currently have:

- a person to contact with concerns? □ yes □ no
- clear responsibilities during activities? □ yes □ no

5.2. Define:

- the person responsible within the organisation for safeguarding (protection of children's rights):
- the persons responsible during activities:
- how do staff/volunteers report concerns?
- how do children/young people report concerns?

6 Processes and documents: what do we already have, and what still needs to be developed?

The aim is not to create a perfect policy, but rather a practical, workable system. Identify the minimum requirements your organisation needs to ensure the safety of children and young people, and analyse:

- what already exists (including informally)
- what needs to be formalised in writing
- what needs to be created from scratch

6.1. What documents or regulations do we ALREADY HAVE?

Documents and regulations that essentially reflect the sections of the Policy, even if they are not named exactly as mentioned in the guidelines.

Document/Practice	Where is it? (document / verbal / elsewhere)	What does it cover?
Code of Conduct for working with children and young people		
Criteria for the selection of staff / volunteers		
Risk assessment for activities		
Reporting procedures (submission of complaints, investigation, response principles)		

Document/Practice	Where is it? (document / verbal / elsewhere)	What does it cover?
Data protection principles (GDPR) (e.g. communications, social media policy, rules on the use of images, etc.)		
Other useful documents or processes (e.g. Code of Ethics, Internal Rules etc.)		
Training and information on the protection of children's and young people's rights		

Note: If something is "simply accepted because it is logical", that is also a practice – make a note of it.

6.2. Do these documents help you in PRACTICE?

Answer honestly:

- Do staff/volunteers know that the documents exist? □ yes □ partly □ no
- Do they know what to do in a problem situation? □ yes □ partly □ no
- Are the documents used on a daily basis? □ yes □ sometimes □ no
- Do children/young people know who to turn to in the event of a complaint? □ yes □ partly □ no

6.3. Key policies for the protection of children's rights

Below is the minimum that is usually required of an organisation working with children/young people.

- **Code of Conduct for working with children/young people**

□ we already have
□ we have some partial version
□ we do not have

<u>If we have it or have it partially:</u>

- Who is it intended for? (staff / volunteers / young people)
- Does it clearly define: what is allowed? what is not allowed? professional boundaries?

What else should be added here?

- **Reporting and responding procedures**

□ we already have
□ we have some partial version
□ we do not have

Please answer:

- Is it clear who to contact if concerns arise?
- Do you know what to do step by step?
- Is it clear when to seek help outside the organisation?
- What is currently unclear or missing here?

- **Risk assessment for activities**

□ we already have
□ we have some partial version
□ we don't have

Think about:

- Is safety considered before activities take place?
- Are the following taken into account: age, environment, gender, the context and specific circumstances of participants?
- How does this work in practice at the moment?

- **Data protection and confidentiality**

□ we already have
□ partially in place
□ we don't have it

Please answer:

- Do employees know: what they are allowed to keep confidential and when confidentiality ends?
- Is it clear to whom information may be disclosed?
- What raises the most questions here?

- **Training and information on the protection of children's rights and safeguarding**

□ we already have
□ we have some
□ we do not have

Think about:

- How do new staff/volunteers learn about safety procedures?
- Do young people themselves know:
  - their rights?
  - where to turn if they do not feel safe?
- What is currently happening simply by 'relying on experience'?

Final reflection

What currently seems:

- the most complicated?
- the most important?
- the questions where we need support?

ANNEX 2

CHILD SAFEGUARDING POLICY FRAMEWORK

This document provides a recommended structure and key content areas for organisations developing their own Policy. Use it as a practical guide to the essential components of a Child Safeguarding Policy.

1. INTRODUCTION

1.1 Information about the organisation

Brief information about the organisation, its objectives, core principles and values (particularly in relation to work with children and young people).

1.2 Objectives of the policy

What you wish to ensure and achieve with this document – e.g. to promote safe work with young people, ensure a shared understanding of child protection and safety within the organisation's work, prevent potential harm and violence against children, encourage open discussion and a safer organisational culture, etc.

1.3 Terms and definitions used in the policy

E.g., types of violence are listed, appropriate and inappropriate behaviour is defined, and the terms 'child', 'young person', 'youth worker', etc. are defined.

1.4 Persons to whom the policy applies

What behaviour the Policy regulates (staff, volunteers, trainees, members, board members, external experts, etc.) and who is the target group that the organisation's Policy aims to protect (for example, children under the age of 18 or young adults in a vulnerable situation).

2. PREVENTIVE MEASURES

There may also be links here to various other documents and processes already in place within the organisation – internal regulations, a code of ethics or others.

2.1 Criteria for the selection of staff and volunteers

The procedure for assessing whether persons involved in work with children and young people (staff, volunteers, members, trainees, etc.) are eligible to work with minors, as well as whether they possess the appropriate competencies.

2.2 Code of Conduct for working with children and young people

This document defines the behaviour and attitudes that are expected, encouraged and strictly prohibited for all participants in the organisation's activities. By signing this code, all staff, volunteers and participants undertake to protect the dignity, safety and rights of all children, young people and other participants in the activities. A list of rules of conduct may be included as an appendix or, if the organisation has other internal regulations setting out rules of conduct, a reference to these may be provided here.

2.3 Risk management

- The procedure for assessing potential risks.
- What are the most common potential risk situations and how to prevent them.

2.4 Other rules of conduct and behaviour relating to the organisation's specific type of operation and activities

E.g., communication and social media policy, rules on the use of images, personal data protection, principles for cooperation with partners and service providers, etc.

3. RESPONSE TO INCIDENTS

3.1 Reporting procedures (submission and investigation of complaints)

- In which cases and to whom to turn (including when it is necessary to contact law enforcement agencies or seek medical assistance).
- Confidentiality. Procedures for documenting and investigating incidents (who does this).
- What are the consequences of violations and inappropriate behaviour.

3.2 Responsible persons

Who to contact in the event of a complaint, as well as where to turn if the complaint is specifically about the person in question.

3.3 Principles for assessing behaviour/situations and responding

In which cases are crises, breaches or inappropriate behaviour dealt with internally within the organisation, and when should other institutions be contacted.

4. IMPLEMENTATION

4.1 Training of staff/volunteers

When and at what stage do staff and others become familiar with the Policy; is there training when starting the work; and if so, how regularly is it repeated.

4.2 Dissemination of the Policy's principles

- Accessibility of information, a child-friendly version of the Policy, and a clearly visible and publicly accessible reporting procedure.
- How children and young people learn about their rights.
- How the principles and procedures set out in the Policy are implemented in cooperation with other partners, service providers, etc.

5. MONITORING AND EVALUATION

The person(s) responsible for monitoring the Policy's implementation and for regular evaluation of its operation, the review procedure and frequency.

ANNEX 3

GUIDELINES FOR DEVELOPING A CODE OF CONDUCT

Why does this matter?

A Code of Conduct sets out the expected behaviours for everyone involved in your activities (staff, volunteers, mentors, group leaders, participants). It helps create a safe, respectful, and inclusive environment. It also gives a clear framework for addressing unacceptable behaviour.

Code of conduct vs Code of ethics?

Sometimes, in certain professional organizations (e.g. for doctors, social workers) a code of ethics is developed with a similar goal in mind. Respectively to ensure that all professionals in the given field have the same set of core values, ethical principles and standards of professional behaviour. However, while the code of ethics usually is for an entire profession, a code of conduct is tailored to the unique needs and standards of one specific organization.

Main principles

→ A Code of Conduct should cover respect, inclusion, safety, and consent.
For example: "I will treat everyone equally, irrespective of age, gender, ethnicity, religion, or sexual orientation".

→ It should also list prohibited behaviours: violence, harassment, inappropriate touching, sexual relationships with participants, misuse of personal data, substance use during activities.

→ It should apply to all stakeholders: staff, volunteers, leaders, and participants. For minors, create a youth-friendly version.

→ The Code should be introduced during pre-departure, orientation, and group agreements, not only in staff manuals. Consider linking it to your activity agreements or contracts so it has weight!

Reflection Questions

- What behaviours should be explicitly promoted in your activities?
- (e.g. respect, inclusion, consent, listening).
- What behaviours must be clearly prohibited?
- (e.g. bullying, harassment, sexual contact, discrimination, violence).
- How will you make sure that everyone - including young people - understands and accepts the Code of Conduct?
- What happens if the Code of Conduct is broken? Who is responsible for responding?

SAMPLE OF A CODE OF CONDUCT

The Code of Conduct defines the behaviours and attitudes that are expected, encouraged, and those that are strictly prohibited for everyone involved in the project. By signing this Code, all staff, volunteers, and participants commit to safeguarding the dignity, safety, and rights of all young people and other persons engaged in the programme.

- I will treat all young people and other people engaged in the project with respect, dignity, and equality, regardless of sex, age, gender identity, sexual orientation, race, ethnicity, (dis)ability, social status, religion, language, or any other factor.
- I will encourage non-violent, respectful, and positive behaviour in all interactions.
- I will not use inappropriate, harassing, abusive, sexually provocative, demeaning, or stereotypical language or behaviour.
- I will not treat any person in a sexist, humiliating, degrading, or abusive way, whether physically, verbally, or psychologically.
- I will respect cultural diversity and traditions, ensuring my words and actions are appropriate to the cultural environment.
- I will respect confidentiality and only share personal information when necessary for safeguarding, or if someone is in immediate danger.
- I will inform young people of their rights, including how to raise concerns or complaints safely.
- I will pay special attention to people who face difficulties, ensuring safe and accessible ways for them to express themselves.
- I will always make sure that another adult and/or young person is present when I am in direct contact with a young person, especially in private or sensitive situations.
- I will not invite unaccompanied young people into private spaces (rooms, homes, cars, online private chats) unless there is an immediate risk of harm.
- I will not enter a young person's private space without the presence of another adult and/or young person.
- I will not engage in any form of sexual activity (including flirting) with young people, regardless of the local age of majority or consent. Mistaking their age is not an excuse.
- I will not exchange sexual favours, money, gifts, or services for any kind of relationship or benefit

- I will not engage in physical, psychological, economic, or sexual violence in any form, whether online or offline.
- I will not facilitate or encourage illegal activities or place young people in situations of unreasonable risk (e.g. involving drugs, alcohol, cigarettes).
- I will not touch young people in culturally inappropriate or intimate ways, nor carry out personal tasks they can do themselves (such as toileting or changing clothes).
- I will not misuse my role by engaging in corruption, fraud, or abuse of power.
- I will not make false accusations or spread rumours about others in relation to safeguarding.
- I will fully cooperate with safeguarding procedures, including reporting concerns and participating in investigations if required.
- I understand that reports are directed first to the DSOrson, who will decide the next steps.
- I will not attempt to investigate on my own but will fully cooperate with internal and external safeguarding processes.

By signing this Code of Conduct, I confirm that I have read, understood, and agree to respect the Safeguarding Policy and all related procedures provided by the Sending/Hosting Organisation.

ANNEX 4

SAMPLE: CHILD AND YOUTH SAFEGUARDING POLICY

Purpose

[Name of the organisation and short description]

When working with people, there is always some risk of mistakes, inappropriate behavior, or even abuse among children/young people. We must accept this reality, but also do everything possible to reduce those risks. Not everyone in an organization is a safeguarding expert, so it's important to recognize our own limits—knowing what actions we can take ourselves and when we must report concerns to the right person or authority.

This protocol is essential in our network, considering that we try to involve especially under 18 participants and/or young people who encounter high vulnerabilities*. **We aim at ensuring an environment that promotes diversity, tolerance and individual development, and that strives to reduce to minimum any risk of abuse, exploitation, discrimination or violence.**

This protocol aims to:

- provide common definitions of violence, abuse, harm and discrimination against participants of youth mobilities organised by [name of the organisation];
- prevent risks of violence, abuse, harm, discrimination addressed to children and young people, by making the managers and every involved adult aware of this protocol and in this way able to convey its message to the other people involved and in particular to convey it to the participants. In this way, the participants are more aware of their rights and are empowered to have an active role in safeguarding. Doing so, it reduces the possibility that the association and its employees, professionals under contract with the association or volunteers of the association (hereinafter collectively referred to as "staff") may cause them any form of damage in the course of their work.
- encourage open and honest discussions about abuse, violence, discrimination and harm within the framework of our projects (pre-departure meetings, meetings with families and guardians, during the project activities, during reflection groups, during leaders' meetings, in the follow-up meetings, etc.);
- ensure correct, secure and transparent reporting paths that guarantee the right of partners (children, families/guardians and staff) to be heard. If abuse or endangerment is suspected, the transparent framework set out in this protocol should enable the association to take effective measures to identify, properly organise and follow up such cases.

This protocol should be read and known by:

- All staff members of the host and sending organisations, partners in the youth mobility.
- Volunteers involved in the activities organised within the framework of the youth mobility.
- Facilitators, guests, speakers, journalists, local partners engaged in the activities of the youth mobility.

*HVYP = Highly Vulnerable Young People. A highly vulnerable young person is a person that is living in a situation of vulnerability and who is facing an overlapping of potential exclusion factors, of which at least one is a long-term or permanent condition. Their involvement in mobility activities implies a need for a long term structural support system to be put in place by all partners in the project and promoted by National Agencies and European stakeholders.

- Group leaders.
- Participants
- Parents and legal guardians of the involved children and young people.

The content of the protocol is shared both in the shape of the present protocol and in shapes that better fit the needs and the competences of the diverse target groups:

- Code of conducts (see Annex 3 in the Guidelines), summarising the main expectations in terms of behaviours by the participants and by the other involved adults;
- An **operational version of the Safeguarding policy**, an handout summarising the main procedures the staff should undertake when facing concerning or abusive behaviours (see "Types of behaviour")
- Non formal education activities, implemented in the first days of the mobility, aiming at providing participants with the basic knowledge to recognise violence and to empower them reporting concerning or abusive behaviours.

Who are we meant to protect

This protocol aims at protecting every children and young adult who is involved, as a participant, in the youth mobilities implemented by *[name of the organisation]*. Considering the age range and the diverse profiles of the participants in our youth mobilities, it is needed to make a distinction between:

- Child: any person under the age of 18 who is involved in our youth mobilities.
- Young adult: any person who is between 18 and 24 years old, who is involved in our youth mobilities as a participant. Considering that in EU funded mobilities the age of participants can reach 30 years old, we extend this definition up to that age, in the framework of our protocol.

An extra distinction needs to be done for Highly Vulnerable Young People involved (both children and young adults) involved in our youth mobilities.

This protocol is not just a document

A safeguarding policy should not be seen as just a written document, nor can we expect everyone to instantly grasp their responsibilities. Building a culture of child protection takes time and requires ongoing effort. Staff, parents, and young people all need space to learn what safeguarding truly means and how the organization can uphold it. For this reason, the policy must be regularly reviewed, discussed, and improved with the active involvement of different people, ensuring that safeguarding remains a shared and evolving responsibility.

Values and Principles

Our Safeguarding Policy is built on the following values and principles and sets the conditions to apply them in the reality of youth mobilities.

1. **Safety** - Every participant has the right to live in a safe environment, free from abuse, violence, exploitation, and discrimination.
2. **Dignity and Respect -** Each person is treated with respect and recognized in their dignity, regardless of age, origin, gender, or personal condition.
3. **Zero Tolerance -** Any form of abuse, harassment, bullying, or violence is unacceptable and will not be tolerated in any context.
4. **Prevention -** Prevention is a priority: risks are reduced through training, awareness, and good practices for all adults involved.

5. **Transparency -** Decisions, procedures, and actions are clear, accountable, and always guided by the best interests of young participants.
6. **Child-Centred -** All decisions concerning minors take into account their age, level of development, and their voice, ensuring they can be heard.
7. **Participation and Empowerment -** Young people are encouraged to know their rights and take an active role in their own protection, including through educational activities.
8. **Confidentiality -** Personal data and sensitive information are handled with discretion, shared only when strictly necessary and in a secure way.
9. **Equality and Diversity -** Every participant is welcomed and valued in their uniqueness, fostering an inclusive environment that respects differences.
10. **Partnership -** Safeguarding is more effective when working together: associations, families, educators, and professionals collaborate for the well-being of young people. Safeguarding is a shared responsibility across staff, volunteers, group leaders, participants, sending and hosting organisations, families and other relevant partners.
11. **Best interests and welfare -** The welfare and best interests of the child or young person are paramount and guide all safeguarding decisions.
12. **Do no harm -** Our activities, decisions and omissions must not create or increase risks for children and young people.

Definitions

We recognize that abuse, violence and discrimination against young people occurs in all countries and societies in the world. Trying to define this situation as a worldwide phenomenon is still quite difficult due to the religious, social, political, legislative diversity and economic differences that children and young people experience.
[Name of the organisation] respects all cultures and religions and based on an intercultural and interdisciplinary approach we have created a unifying framework. In order to prevent and respond to situations of violence against children and young people it is crucial that our organisation reaches a common understanding of what abuse is and the circumstances under which safeguarding protocols and procedures apply.

In the table below we have included some criteria that can guide the evaluation of a situation that might constitute a concern or a suspicion of abuse, within the framework of a youth mobility.

Appropriate behaviour	Concerning behaviour	Abusive behaviour
Socially acceptable. Developmentally acceptable. Clearly consensual. Shared decision by those involved: no use of power in decision making. In line with the role (participant, group leader, facilitator, team member, etc.). Respectful intentions. Positive or neutral impact.	Socially unacceptable (might be culturally acceptable or acceptable in the peer groups, but still harming). Consent is given, but under power or peer pressure. Clear imbalance of power. Driven by anger, revenge, hate, prejudice. Impact: harm, pain, distress, strong discomfort. Could also include self-harm.	Use of coercion or force. No clear consent. Abuse of power. Can involve physical or sexual violence. Violates human rights. Sometimes it is clearly illegal. Impact: harm, pain, strong distress, traumatic experience. Concerning behaviour can become abusive if it is repeated.

This behaviour spectrum should be read together with the response levels described in this policy. Low-level poor practice may fall within the concerning behaviour category and should be addressed early to prevent escalation. Not every concerning behaviour constitutes abuse, but repeated or escalating concerning behaviour may develop into abusive behaviour.

Forms of violence

Violence refers to any intentional act or behaviour that causes, or has the potential to cause, physical, sexual, emotional or psychological harm. Violence may occur between adults and young people, between peers, or in other relationships involving power, trust, dependency or authority. Violence can take different forms, such as:

- **PHYSICAL ABUSE** involves hitting, beating, pushing, punching, poisoning, burning or scalding, drowning or suffocating.

- **EMOTIONAL ABUSE** can be verbal and non-verbal humiliation, intimidation, threats, terrorising, restrictions on freedom of action, denigration, unfair accusations, discrimination, ridicule and other hostile or rejecting attitudes towards the child or young person.
    - If the emotional abuse is repetitive and continuous, it leads to affecting their personality structure, cognitive development, adaptation ability, perceptions. In this case emotional violence becomes psychological abuse, which has more serious consequences than emotional abuse.

- **SEXUAL ABUSE** represents the engagement in any form of sexual behaviours that are:
    - non consensual
    - below the sexual consent age, according to the national legislation of both the host and sending countries. Where legal or safeguarding standards differ, the stricter safeguarding requirement should normally be applied, while always complying with mandatory local legal obligations.
- This category can include:
    - sexual molestation, exposing the child or young person to insults or language with a sexual connotation, as well as touching erogenous areas with the hand or by kissing.
    - situations that lead to the satisfaction of the sexual needs of an adult or, or of another child/teenager who is in a position of power or in a relationship of trust with the victim;
    - attracting or forcing the child/young person to commit obscene actions;
    - exposing the child/young person to obscene material or providing them such materials;
    - not respecting the child/young person consent for being touched or engaged in intimate age appropriate behaviour;
    - sexism or sexist actions;
    - sexual harassment: remarks with a sexual connotation, such as recounting sexual episodes, naughty comments, remarks with a sexual connotation, for example, about clothing, and appearance and calling a person sexualized nicknames, as well as "jokes" or sexual mockery.

- **ONLINE HARASSMENT** for example, using phones, instant messaging, e-mail, chat rooms or social media networks to harass, criticise, threaten, intimidate, mock and ridicule someone. It includes "sexting" online, for example when a person shares sexually explicit, nude or semi-nude images or videos of themselves or with other people or sends sexually explicit messages.

- **NEGLECT** in the situation of residential child and youth mobilities, children could be at risk of neglect if the host, accommodation, food conditions provided for them during the project are not suitable or age appropriate, are endangering their physical stability or their health. For example, the accommodation provided to them is not safe or healthy, the food is not enough or not appropriate, there is not appropriate access to hygiene facilities, physical activities involve high risk of accidents and there is no protection or intervention mechanism offered, children do not have access to medical care when needed, etc.

- **FINANCIAL ABUSE** involves the inappropriate use, control or exploitation of a child or young person's financial resources, assets or opportunities. This may include:
  - denying them access to their own money or resources,
  - manipulating them to give away money, gifts, or property,
  - forcing them to work without fair compensation,
  - misusing allowances, scholarships, stipends or project-related funds meant for their benefit,
  - exploiting their personal data for financial gain (e.g., identity theft, online scams).
- Financial abuse undermines a young person's independence, security, and ability to meet their basic needs, and can leave long-lasting effects on their wellbeing and development.

- **SELF-NEGLECTING** refers to situations where a child or young person persistently fails to attend to their own basic physical, emotional, or health needs, in a way that endangers their wellbeing or development. This may manifest as:
  - not maintaining personal hygiene, nutrition, hydration, or sleep,
  - refusing necessary medical care or medication,
  - engaging in risky or harmful behaviours that disregard their own safety,
  - consistently ignoring their own physical or emotional needs despite having the capacity to address them.
- Self-neglect differs from neglect by others: it arises from the young person's own actions or omissions rather than from the failure of a caregiver. However, it is often linked to underlying emotional distress, trauma, or mental health challenges, and requires timely support and safeguarding interventions.

- **GROOMING** is when an adult (or older peer) deliberately builds a relationship of trust with a child or young person in order to manipulate, exploit, or abuse them. It can happen in person or online.
  - Starts with attention, gifts, or special treatment.
  - Involves secrecy, isolation from others, and creating dependency.
  - May gradually introduce sexualised talk, images, or behaviour.
  - Often hard for the victim to recognise, because it feels like care or friendship.

Grooming destroys trust, increases vulnerability, and can lead to long-term psychological and emotional harm.

It is important to recognize that a young person may be affected by multiple forms of violence at the same time.

Roles and responsibilities

At [name of the organisation], safeguarding is a shared responsibility. Every person involved in our activities—staff (paid or unpaid), volunteers, group leaders, facilitators, partner organisations, and participants—has the duty to act in line with this policy and to promote a culture of safety and respect.

We expect all those engaged in our programmes to:

- Be role models of safe and respectful behaviour, and actively contribute to creating an inclusive and protective environment.
- Understand and sign the Code of Conduct (see Annex 3 in these Guidelines) and all other relevant documents related to their role.
- Follow the safeguarding guidelines; in case of any concern, suspicion, or disclosure of abuse, act immediately according to the procedures described in this policy.
- Support open dialogue on safeguarding issues, encouraging awareness, prevention, and collective responsibility.

Ultimately, safeguarding is not only the responsibility of designated officers or coordinators. Everyone has a role in ensuring the wellbeing of young people, especially those who are highly vulnerable. By working together, we can prevent harm, respond appropriately when risks arise, and build safe spaces for learning, growth, and solidarity.

We also recognise that certain roles carry greater responsibility and accountability. Individuals with specific positions—such as Designated Safeguarding Officer (DSO), group leaders, etc.—are entrusted with additional obligations to monitor, guide, and ensure that safeguarding measures are consistently applied.

For the purposes of this Sample, the Designated Safeguarding Lead (DSL) refers to the organisation-level person with overall safeguarding responsibility, while the Designated Safeguarding Officer (DSO) is the safeguarding focal point physically present during the mobility.

The following section outlines these key roles in detail, describing their specific responsibilities and the standards of conduct expected from each.

The **DESIGNATED SAFEGUARDING LEAD (DSL)** is the person appointed by the host organisation with overall responsibility for safeguarding and child and youth protection within the youth mobility. The DSL has a supervisory, coordinating and decision-making role in safeguarding matters and ensures that safeguarding policies and procedures are properly defined and implemented throughout all phases of the youth mobility (preparation, implementation and follow-up). The DSL may not be physically present during the mobility, a role which is instead carried out by the Designated Safeguarding Officer (DSO), but must be clearly identified, reachable and operational for the entire

duration of the project. The DSL is not the group leader or group facilitator and does not replace the role of the DSO. Ideally, the DSL holds a position of responsibility within the organisation that enables them to take authoritative safeguarding decisions.

The competences that the DSL should have are:

- a strong understanding of safeguarding and child and youth protection principles, including legal and ethical responsibilities;
- In-depth knowledge of the organisation's safeguarding policies, procedures and reporting mechanisms;
- the ability to assess risk and make informed decisions in safeguarding cases;
- an understanding of trauma-informed organisational and decision-making practices;
- good knowledge of youth mobility goals, structures and potential safeguarding risks.

The main roles of the DSL in a youth mobility are:

- holding overall responsibility for safeguarding and child and youth protection within the project;
- ensuring that safeguarding policies, protocols and codes of conduct are in place, up to date and clearly communicated to all staff members, collaborators, volunteers and group leaders;
- supporting and supervising the work of the Designated Safeguarding Officer during the mobility;
- acting as the main safeguarding point of contact for the DSO in cases of concerns, disclosures or incidents;
- receiving, reviewing and validating written safeguarding reports submitted by the DSO;
- deciding on, or confirming, the actions to be taken in response to safeguarding concerns, including referrals to external authorities or services where required;
- ensuring that safeguarding records are kept securely and confidentially;
- promoting an organisational culture based on prevention, safety and shared accountability.

The **DESIGNATED SAFEGUARDING OFFICER (DSO)** is the person appointed by the host organisation to care for the wellbeing of the participants in all moments (formal, non-formal and informal) of the youth mobility. The DSO is not the group leader or group facilitator and ideally should not be the project coordinator of the youth mobility. Ideally, they might have some administrative or educational roles, but this will not be their main role during the project. The profile of the DSO might be different according to the project activities and to the profile of the group.

The competences that the DSO should have are:

- a good understanding of child and youth emotional development
- a detailed knowledge of the Safeguarding protocols of the organisation
- good skills in understanding group dynamics in non-formal and informal contexts
- understanding of trauma informed care and trauma informed education
- good knowledge of youth mobility goals and characteristics.

The main roles of the DSO in a youth mobility are:

- caring for the physical safety and basic needs of the participants (food, accommodation, safety protocols, safe travel, safe spaces, etc.);

- advising facilitators and group leaders on creating safe educational spaces and trauma informed activities;
- participating in leaders' meetings with a focus on monitoring the safety and the safeguarding of all participants;
- evaluating suspicions of concerning or inappropriate behaviours and facilitating the decision about the response and actions to be taken;
- being the contact person with the Designated Safeguarding Lead (DSL) for the project for the Host Organisation and, if needed, Sending Organisations;
- reporting (in writing) the safeguarding incidents that were reported, evaluated and responded to and deliver it to the DSL;
- respecting the Code of conduct and the safeguarding protocol for staff members, collaborators, volunteers and group leaders.

The DSO acts as the first safeguarding focal point on site but does not carry sole responsibility for serious safeguarding decisions. Serious or potentially abusive incidents must be escalated to the DSL and, where required, to relevant external authorities or services.

ACCOMPANYING ADULTS are the people that take care of the group of participants and ensure they develop in a safe way during the entire process (preparation, mobility, follow-up). In the specific framework of youth exchanges, they are also defined as group leaders. The minimum profile of the group leaders should include:

- when working with minors, at least one of the leaders of the group should be older than 21;
- at least intermediate language level both in the language of the participants of their group and in the official language of the project;
- a detailed knowledge of the Safeguarding protocols of the organisation;
- basic understanding of group dynamics in non-formal and informal contexts;
- basic understanding of trauma informed care and trauma informed education;
- good knowledge of youth mobility goals and characteristics;
- basic understanding of child and youth emotional development.

The main role of the group leaders:

- actively participating in the preparation process and, if applicable, participate in the Preparatory Visit;
- facilitate conversations about safeguarding protocols with participants and their families/guardians (if applicable) during the preparation;
- ensuring safe travel for participants;
- accompanying participants in their learning process and leading reflection groups during the youth mobility;
- participating in the leaders' meetings during the youth mobility;
- evaluating, together with the DSO, concerning behaviours and/or suspicion of abuse, violence or discrimination;
- taking an active role in deciding the response to any safeguarding incident regarding the participants of their national group;
- contact person for the sending organisation and families/guardians of participants in case of safeguarding incidents;
- actively participating in the follow up evaluation and dissemination process;
- respecting the Code of conduct and the safeguarding protocol for staff members, collaborators, volunteers and group leaders.

The **HOST ORGANISATION** has the following responsibilities for safeguarding:

- when selecting group leaders accompanying minors, making sure that, if you didn't work together already in the past, they have at least two references (from former collaborators, employers etc), mainly regarding behavioural integrity;
- ensuring training and addressing the topic of safeguarding with staff members and group leaders;
- appointing one staff member as a Designated Safeguarding Lead;
- Appointing one staff member a Designated Safeguarding Officer for each youth mobility, i.e. the person who will be on the field during the mobility and will be in charge of safeguarding. They will stay in contact with DSLs (both from the hosting and from the sending organisations) in case of need.
- ensuring that the staff members understand the national/local legislation regarding safeguarding and that they have the needed resources (partners, contact details of institutions, protocols, etc.) to respond to safeguarding incidents.

The **SENDING ORGANISATION** has the following responsibilities for safeguarding:

- when selecting group leaders, making sure that they have at least two references, mainly regarding behavioural integrity;
- ensuring training and addressing the topic of safeguarding with group leaders;
- monitoring group leaders' activities regarding safeguarding protocols;
- appointing one staff member as a Designated Safeguarding Lead for youth mobility, with whom the DSO, who is physically on the field, can communicate in case of need;
- contribute to the management of safeguarding incident when involved by the Designated Safeguarding Officer and/or the group leader.

Preventive Safeguarding Measures

Safeguarding begins before a mobility takes place. [Organisation] applies preventive measures aimed at reducing the likelihood of harm and ensuring that participants, staff and partners are adequately prepared. These measures include safe recruitment and selection, safeguarding risk assessment, Codes of Conduct, safeguarding induction and training, and clear preparation of participants and families.

Safe recruitment and selection

Staff, volunteers, group leaders and other adults with safeguarding responsibilities should be selected through procedures appropriate to their role and national legal context. These may include written role descriptions, interviews, safeguarding declarations, reference checks and criminal-record or equivalent background checks where legally permitted. Background checks alone are not sufficient and should form part of a broader assessment of suitability, values and safeguarding awareness.

Safeguarding risk assessment

Before each mobility, the hosting and sending organisations should identify and assess safeguarding risks related to participants' profiles and vulnerabilities, travel and transportation, accommodation, programme activities, supervision, health and wellbeing, group dynamics, digital communication and relevant cultural or legal differences. Preventive and response measures should be agreed and documented before the mobility begins.

Safeguarding induction and training
All staff, volunteers and group leaders with safeguarding responsibilities must receive appropriate safeguarding information or induction before the mobility. This should include the organisation's safeguarding principles, roles and responsibilities, professional boundaries, reporting procedures, contact details of the DSL/DSO and relevant mobility-specific risks. Refresher training should be provided regularly where possible.

Steps in addressing suspicion of inappropriate behaviour

Since safeguarding is everyone's responsibility, it is essential to highlight the importance of speaking up. We all have a duty to raise concerns for those who cannot protect themselves. Reporting a suspicion or concern about someone being hurt or abused is always the right thing to do.

This should never be seen as "snitching" or "being a tattletale." Choosing silence can allow further harm to occur, while raising a concern can prevent abuse and protect others. Reports are first directed to the DSO, not immediately to external authorities. They will carefully assess the situation and decide on the next steps.

It is normal to feel uneasy or afraid about reporting suspected abuse. However, overcoming those fears is crucial to safeguarding vulnerable people. If you choose to speak up, [name of the organisation] will fully support and protect you, ensuring you are neither harmed nor criticised for doing the right thing.

1. ***REPORTING AND/OR SUSPUCION OF VIOLENCE, ABUSE, DISCRIMINATION***

The safety of children and young people in youth mobilities is the responsibility of everyone. In the case of any suspicion of concerning or abusive behaviour, all young people and adults are encouraged to report it. A person does not need to have proof that abuse has occurred before reporting a safeguarding concern. A reasonable concern, disclosure, observation or suspicion is sufficient to activate the reporting procedure. Young people aged over 18 and all adults are obliged to report any suspicion of concerning or abusive behaviour.

In the situation of suspicion, the reporting mechanisms are:

- reporting to one of the group leaders
- reporting to the Designated Safeguarding Officer
- reporting anonymously through an online form link that will be provided to all participants, group leaders and staff members

Accountability and whistleblowing
Staff, volunteers, partners and participants must be able to raise concerns not only about individual behaviour but also about unsafe organisational practices, failures to follow safeguarding procedures, or attempts to conceal safeguarding concerns. Such concerns may be reported through the normal safeguarding pathway or through an alternative senior/independent contact where the normal pathway is inappropriate.

What to do when an incident is reported:

- ensure the person about their rights to confidentiality and the boundaries of confidentiality;

- do not start investigating on your own, do not question the sincerity of the testimonial;
- ask non-intrusive questions about facts, in order to have as many details as possible;
- listen actively and respectfully;
- inform the person about the next steps to be taken.

During the mobility, the DSO normally acts as the first onsite safeguarding focal point. The DSO is responsible for ensuring that concerns are escalated to the DSL in accordance with this policy. Participants may also approach another trusted person, including their group leader, who must then follow the agreed reporting pathway.

All incidents reported are to be discussed with the DSO designated for the youth mobility. It is important that NO other adult involved in the project initiates any investigation or response on their own.

If the concern relates to the DSO, the report should be made directly to the DSL or another designated senior safeguarding contact. If the concern relates to the DSL, the concern should be reported to [organisation leadership / deputy safeguarding contact] or, where appropriate, directly to the relevant external authority or service. These alternative reporting routes must be communicated clearly to participants and staff.

2. *EVALUATION OF THE TYPE OF BEHAVIOUR*

Once the DSO receives a report of an incident, their main role is to evaluate (together with the group leader or not, depending on the situation), if the incident is a concerning behaviour or an abusive behaviour. In order to evaluate, they will take into consideration the definitions provided in this protocol. They can rely on the Designated Safeguarding Lead from their organisation and stay in contact with the DSLs of the sending organisations in case of need or to discuss specific issues concerning the participants' background.

3. *TYPES OF INTERVENTION*

If the Designated Safeguarding Officer decides:

- **Concerning behaviour:** where consultation with group leaders is needed, only the information necessary for assessing risk and agreeing protective measures should be shared. Identifying or sensitive information should not be disclosed more widely than necessary. The host team and the leaders', with the facilitation of the DSO, decide together on the actions to be taken in order to stop or reduce to minimum the impact of the incident. Some example of actions that can be taken, but not only: separate the victim from the instigator, one to one discussions, mediation between victim and instigator, changing the setup of the project to make it safer, address a certain topic in plenary (making sure the victim or the instigator are not pointed out by this action), rediscuss safety rules and group agreements, etc.

- **Abusive behaviour:** when the DSO evaluates an incident as abusive and/or illegal, the next steps to be taken are to inform the Designated Safeguarding Lead from each of the Host and Sending Organisations and report the incident with as many details as they have. It is now the responsibility of the SO and HO to decide together on the next steps to be taken, in cooperation with the staff members of the HO and with the DSO, according to national legislations and internal protocols.

Wherever possible, safeguarding action should be taken with the knowledge and involvement of the person affected, and their views should be taken seriously. However, consent is not required where there is a legal duty to report or where action is necessary to protect a child or another person from serious harm. The DSO and/or group leader need to clearly inform the young person about the boundaries of confidentiality and the legal requirements. All steps need to be communicated to the victim and actions should be taken with precaution and avoiding, as much as possible, retraumatizing the victim.

MINOR ON MINOR PEER VIOLENCE

Suspicions or concerns about violence by a minor against another peer should be dealt with in a special way.
Any such approach requires:

- recognizing the fact that a minor who has been violent with another peer differs significantly from adults who have committed such acts;
- to take into account that in all the decisions taken, the main concern is the best interest of the minor, both for the victim and for the one who commits the abuse.

4. *DOCUMENTING*

For a clear monitoring of incidents, the Designated Safeguarding Officer will document the incidents in a written report. Safeguarding reports are confidential documents and must be stored securely. Information from a report should only be shared with persons or organisations that need the information in order to safeguard the participant, fulfil organisational responsibilities or meet legal or programme requirements. Where relevant, this may include designated safeguarding contacts in the hosting and sending organisations and competent external authorities.

Boundaries of confidentiality:
Confidentiality cannot be guaranteed absolutely in safeguarding cases. It means that information should be treated sensitively by group leaders, DSO, DSLs or any other staff member and shared only on a need-to-know basis. Wherever possible, the person concerned should be informed and involved before information is shared. However, information may be shared without consent where there is a legal duty to report or where this is necessary to protect a child or another person from serious harm.

The boundaries of confidentiality are:

- if the situation strongly endangers the physical and/or psychological health of the person (over 18 years old).
- if the safeguarding incident is an abusive situation that involves a minor.

In any case, reporting further must be done with respect for the dignity of the person(s) and avoiding retraumatizing. All steps need to be clearly communicated to the person(s) concerned.

5. *THE RIGHT TO PRIVACY*

Protecting the child's or the young person's right to privacy refers to personal data about them, including photos, texts, films, etc., which are produced for communication and visibility purposes. Any information about the person's past, state of health, identity, social or economical status and any other sensitive information must be carefully stored.

This information must be treated confidentially and with discretion, including by those who have access to it for the fulfilment of work responsibilities.

All staff members, group leaders and external partners involved in the dissemination of information about our projects and in the creation and distribution of communication materials, act in accordance with the following guiding principles:

- when communication materials are produced in which a child or a young person appears, permission is requested in this regard from both the young person and their legal representative (if they are minors);
- we use their names with care, especially when it comes to sensitive information about them (eg: family history, health status, disabilities, identity, social status, etc.);
- we only use the image of the child or the young person while engaged in activities and not images produces and/or recorded during free time or private moments, in order to avoid the exposure of the person in situation that might show them in a vulnerable position.

Implementation, communication and review

This policy must be actively communicated and implemented, not only made available as a written document. Relevant staff, volunteers, group leaders, participants and partners should know the main safeguarding rules, reporting pathways and contact persons. A youth-friendly and accessible version should be provided where appropriate. The policy should be reviewed at least annually, and additionally following a serious safeguarding incident, significant organisational change or relevant change in legislation. Feedback from participants, staff and partners, as well as lessons learned from incidents, should inform the review.

Safeguarding contacts

The names and contact details of the relevant DSL and onsite DSO, as well as emergency and external reporting contacts where appropriate, must be clearly communicated to all participants and staff before and during the mobility.

Annex: Code of Conduct

[See Annex 3 in the Guidelines]