



Project management tools

Internal child safeguarding policy

EJUC - Deliverable D1.1

Work package lead – EEB

November 2025

Project general information	
Project name:	Environmental Justice for Unheard Communities
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Introduction

This document, which forms part of the EJUC project management tools under WP1, contains the **internal child safeguarding policy**.

It addresses issues that may arise during the project implementation including sexual harassment, data sharing, health and safety for children and minors, and it pretends to mitigate these potential problems.

The policy responds to the following international standards and guidelines:

- ✓ UN Convention on the Rights of the Child (CRC) (1989)
- ✓ Keeping Children Safe (KCS) Standards [Website](#)
- ✓ Inter-Agency Standing Committee (IASC) Minimum Standards on Child Protection
- ✓ Save the Children's Child Safeguarding Standards & Guidelines
- ✓ Core Humanitarian Standard (CHS) on Quality and Accountability [CHS Alliance Website](#)
- ✓ International Taskforce on Child Protection (ITFCP)
- ✓ UNICEF's [Child Safeguarding Toolkit for Businesses](#)
- ✓ WHO Guidelines on Ethics & Child Protection in Research & Programming [WHO Ethical Guidance](#)

This policy includes a mechanism to report safeguarding concerns that can be used by children and minors involved in any of the activities of all WPs of the project in case of experiencing any kind of abuse. A form is also available for adults witnessing any kind of abuse made to children and minors participating in activities under this project.

Definitions

The term “**safeguarding**” means protecting people’s physical and mental health, wellbeing and human rights, and enabling them to live free from harm, abuse and harassment in line with our agreed values. It specifically addresses the need to prevent and respond to harm from any potential, attempted, or de facto abuse of power, trust or vulnerability, especially for sexual purposes.

The aim of this child safeguarding policy is to protect children and minors from harm arising from contact with other people while participating in any of EJUC project activities and work.

Child/children: Refers to anyone under the age of 18 years old, irrespective of the age of majority in their country, or the country where they are located or living.

Unaccompanied child/children: a child who arrives on the territory of the Member States unaccompanied by an adult responsible for him or her whether by law or by the practice of the

Member State concerned, and for as long as he or she is not effectively taken into the care of such a person; it includes a minor who is left unaccompanied after he or she has entered the territory of the Member States’.

Abuse: used in its widest sense and includes physical, emotional/psychological and sexual abuse, neglect and negligent treatment, violence and exploitation in all forms (indicatively labour, criminal, economic, emotional and social, digital exploitation) which the UN Convention on the Rights of the Child (CRC) and Optional Protocols define child exploitation broadly to cover all activities that unfairly use children for personal gain, especially where the child is unable to give informed, free consent.

Emotional Abuse: The persistent emotional ill-treatment of a child such as to cause severe and long lasting effects on the child’s emotional development. It may involve conveying to children that they are worthless and unloved, inadequate, or valued only so far as they meet the needs of another person. It can also involve age or developmentally inappropriate expectations being imposed on children, or causing children frequently to feel frightened or in danger. Some level of emotional abuse is involved in all types of ill-treatment of a child, though it may occur alone.

Neglect: The persistent failure to meet the child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s physical or cognitive development.

Physical Abuse: This may involve hitting, shaking, throwing, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or caregiver feigns the symptoms of, or deliberately causes, ill health to a child who they are looking after.

Sexual Abuse: Involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening or gives consent. The activities may involve physical contact, including penetrative or non-penetrative acts. They may also include non-contact activities, such as involving children in looking at, or in the production of, pornographic materials or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

Scope

This policy applies to all **EJUC project activities implemented by the project partners** including, all beneficiaries and affiliated entities part of the project consortium, members of the advisory board and other project experts.

The policy will be applied from the moment of the approval of the policy planned during the kick off meeting of the project taking place on 27 November 2025, until the end of the project on 31 August 2027.

The EJUC project will strive to develop a safeguarding culture where **the rights of children and minors involved in any activity of the project are prioritised** over other considerations.

Principles

EJUC project partners are committed to ensure the safety, dignity, and well-being of all children and minors engaged in any of the project activities.

This policy is guided by the following principles:

- ✓ **Zero Tolerance:** No form of child abuse, exploitation, or neglect will be tolerated.
- ✓ **Best Interests of the Child:** All decisions must prioritize the child's safety and well-being.
- ✓ **Equal rights:** all children have equal rights to protection and participation throughout the project's activities.
- ✓ **Accountability:** All project partners share responsibility for safeguarding.
- ✓ **Confidentiality:** Sensitive information must be handled with care and shared only on a need-to-know basis.

Partner Accountability for Safe Recruitment and Background Checks

To ensure safeguarding compliance, project partners are responsible for the safe recruitment of the staff involved in this project and must:

- ✓ **Develop/Implement Internal Policies:** Establish background check procedures within their own safeguarding frameworks.
- ✓ **Conduct Screening:** Ensure all candidates demonstrate an understanding of child safeguarding.
- ✓ **Require Signed Commitments:** Ensure employees and volunteers sign a Child Safeguarding Code of Conduct.
- ✓ **Provide Documentation:** Upon request, partners must demonstrate compliance with these requirements.
- ✓ **Inclusion of Volunteers and trainees** in the abovementioned procedures and requirements

Risk Assessments and Preventive Measures

Before engaging in any activity with children or minors participation, partners should conduct a risk assessment:

- ✓ **Identifying Potential Risks:** Assess the likelihood of harm in various settings.
- ✓ **Mitigation Strategies:** Implement safeguards such as supervised interactions and clear behaviour protocols.
- ✓ **Safe Digital Communication:** Establish protocols for online engagement with children.

To ensure the safeguarding of children and minors, EJUC project partners responsible for any of the activities under this project **must not:**

- ✓ Engage in sexual activity with anyone under the age of 18 regardless of the age of majority and legal consent in a country. Mistaken belief in the age of a child or minor is not an adequate or acceptable defence.
- ✓ Sexually exploit or abuse children or minors or behave towards a child in a way that is offensive, abusive, sexually provocative, demeaning or culturally inappropriate.
- ✓ Use inappropriate language or behaviour when dealing with children or minors.
- ✓ Recruit or employ anyone below national legislated minimum working age.
- ✓ Use children's pictures and information in a way that could put them at risk or publish pictures of children without the written consent of their parents or guardians or take pictures of undressed children.

Confidentiality and Data Protection

Written Consent of the minor and the legal guardian: For the participation of unaccompanied minors in any activity of the project, a prior written consent must be given both by the minor and the legal guardian. If there is no legal guardian present or appointed:

- ✓ Seek consent from an authorized representative (e.g., assigned social worker, guardian ad litem, or reception center manager with legal authority).
- ✓ Always also get the child's voluntary assent, using child-friendly language explaining the purpose of the activities, their rights, and that participation is completely voluntary.
- ✓ The content of the written consent includes at minimum, the aim of the activity, the protection of their anonymity during the data sharing process and the aim of data procession.
- ✓ If no guardian is assigned yet, and only the child can consent, this must be cleared in writing with your Child Safeguarding Focal Point and noted in your documentation.
- ✓ Secure Storage: Sensitive safeguarding data must be stored securely with restricted access.
- ✓ Media exposure: Any photo of minor that will participate in the activities of the project will be taken only after the written consent of the minor and the legal guardian.

Reporting mechanism and Response Protocols

All safeguarding concerns must be reported immediately through a clear and accessible process:

- ✓ **Reporting Channels:** Children, minors and other individuals can report concerns via clear process including addressing an appointed Safeguarding Lead written or verbally, or/ and a confidential email. Forms will be also available online in the project's website page in English and in other local languages. Project partners in the four project countries (FR,ES,HU,RO) are responsible for facilitating the **translated version of the forms**.

At the beginning of events, participants should be informed about the reporting mechanism including the channels for submitting the safeguard concern forms.

A specific reporting system shall be established by each partner organisation to address any potential misconduct during the project duration.

Below, is the example on how to set up the reporting mechanism in the framework of this project.

Partner organisations should inform and make available the **Safeguarding Concern Form in the local language** (see here below the EN version) to participants of all activities organised under the EJUC project. All participants of any project activity should be informed about the possibility of reporting safeguarding concerns and this information should be part of the registration and evaluation forms.

Principles from the complaint mechanism include:

- ✓ Timely - Complaints will be investigated and responded to in a timely manner.
- ✓ Fair - Each complaint will be addressed in an equitable, objective and unbiased manner through the complaints handling process.
- ✓ Confidentiality - Some complaints need to be kept confidential in order to safeguard those making or involved in the complaint. However, in some instances it might be judged that the complainant will be better served if others are involved in the resolution of a complaint.
- ✓ Responsive - Where investigation shows that actions are required, as a result of complaints, these will be implemented.
- ✓ Feedback - Complainants will be given the opportunity to provide feedback on the response to the complaint.

How to report

Safeguarding concerns can be shared to any of the safeguard leads verbally or in writing (see table here below table with contacts). They can be shared using the telephone or in person and will be addressed as expediently as possible through a verbal or written response. If a child, minor or other person sharing a verbal concern is not satisfied with the response, he or she may follow up with a written safeguarding concern form. Only written concerns will require a written response and trigger the process described in the following paragraphs. Written concerns can be submitted by post or email.

What happens after a safeguarding concern is shared?

Safeguarding concerns will be processed by the contacted safeguarding lead and shared with the project coordinator. The local safeguarding lead will work to investigate the circumstances surrounding the issue being addressed and will provide a response to it within 48 H.

What should the affected child / minor do in case of dissatisfaction with the response?

In the event of a child/minor being dissatisfied with the response from the focal safeguarding lead they may appeal in writing contacting the project coordinator. The coordinator will, with eventual external advice, look to further actions and will inform the child/minor and the safeguarding lead accordingly.

Safeguarding Leads for each partner organisation

Complaints can be addressed to any of the following **Safeguarding Leads**:

Name	Organisation	Country	Language	Mail address	E-mail	Mobile nr
Louise Bonneau	BREU	Belgium	EN, FR	Rue Michel Zwaab 20 3, 1080, Molenbeek-Saint-Jean	louise.bonneau@bridge-eu.org	+32 465626822
Roxana Bucata	2CELSIUS	Romania	EN, RO	Str. Al. Sahia 18, sc. C, ap. 5, 515600, Cugir, Centru	roxana@2celsius.org	+ 43 681 10545624
Lorena Doghi	UCTRR	Romania	EN, RO	Strada Uliului Nr 6, 400289, Cluj Napoca	lorenadoghi@yahoo.com	+40 751 351433
Melinda Mihály	ELTE CERS	Hungary	EN, HU	Toth Kalman Utca 4., 1097, Budapest	mihaly.melinda@krtk.elte.hu	+36 30 957 8198
Ana Barreira	IIDMA	Spain	EN, ES	Calle Garcia De Paredes 76 Duplicado 000, 28010, Madrid	ana.barreira@iidma.org	+34 639 727 464
Valeria Méndez de Vigo Ruben Romero Masegosa	CEPAIM	Spain	EN, ES	Avda. Fabian escribano moreno, 77, 30570, Beniajan	valeriamendezde vigo@cepaim.org romero@cepaim.org	+34 667 689769 +34 678 420396
Csaba Kiss	EMLA	Hungary	EN, HU	Garay u. 29-31. l.em.1, 1076, Budapest	drkiss@emla.hu	+36 132 28462
Roland Imre	Dzsaj Bhím	Hungary	EN, HU	Szabadság utca 21., 7623, Pecs	imre.roland@ambedkar.hu	+36 303 594055
Sophia Arouche	GHETT'UP	France	EN, FR	14 rue des Gazomètres, 93200 Saint-Denis	sophia@ghettup.fr	+33 661 477988

The affected child/minor can contact the **Safeguarding Lead** from the Coordination of the project in case the answer from the local Safeguarding Lead is dissatisfied.

Name	Organisation	Country	Language	Mail address	E-mail	Mobile nr
Patrizia Heidegger	EEB	Belgium	EN, FR	Rue des Deux Eglises 14-16, B-1000 Brussels	patrizia.heidegger@eeb.org	+32 483 12 54 43

Revision and Improvement

Feedback from project partners and other stakeholders should contribute to inform future update, revisions and enhancements of this policy, ensuring an adequate response to any raising question, challenges, effectiveness and relevance. The policy shall continuously evolve to address emerging challenges and promote best practices.

Approval and Endorsement

All implementing partners, including all beneficiaries and affiliated entities, must confirm their agreement to adhere to this safeguarding policy.

This policy is approved and endorsed by the consortium and applies to all activities and Work Packages of the EJUC project.

Effective Date: 27 November 2025.

Your Voice Matters — Safeguarding Concern Form for Children and Minors

We want you to feel safe, respected, and supported. If something is making you feel uncomfortable, unsafe, or upset, you can use this form to let us know.

1. Your Name (optional*): _____

* Should you wish to stay anonymous because you fear consequences from reporting, we prefer an anonymous report to no report. In this case, please record why you felt compelled to report anonymously.

2. What has happened that you want to talk about? (Please describe in your own words. You can write as much or as little as you like.)

3. Where did this happen?

4. When did it happen? (If you're not sure, that's okay)

5. Who was involved?

6. How has this made you feel? (Check all that apply)

Worried Scared Sad Angry Confused Embarrassed Something else:

7. Would you like someone to talk to you about this? Yes, please I'm not sure No, thank you

8. Is there anything else you'd like to share?

9. Can we contact you to follow up on this? Yes No

By phone? Number:

In Person?

Date:

Please give this form to a trusted adult they can also help you fill it in. Or you can send it yourself to the local safeguarding lead of this project (see table here above).

Safeguarding Concern Reporting Form

For adults to report a safeguarding concern.

1. Your Name:

2. Your Role / Relationship to the child or young person:

3. Date of Concern:

4. Time of Concern (if known):

7. Describe the concern:

(Please describe what you have seen, heard, or been told. Be specific and factual. Include dates, times, and locations if possible.)

8. Was there a disclosure made by the child/young person?

Yes No

If yes, what did they say?

(Use their own words as much as possible)

9. Any visible injuries or signs?

Yes No

If yes, describe or note where on the body:

10. Action taken (if any):

(e.g., who you informed, what support was offered)

11. Have you referred this to the Safeguarding Lead?

Yes – Name of Safeguarding Lead:

Not yet

Signature:

Date:
