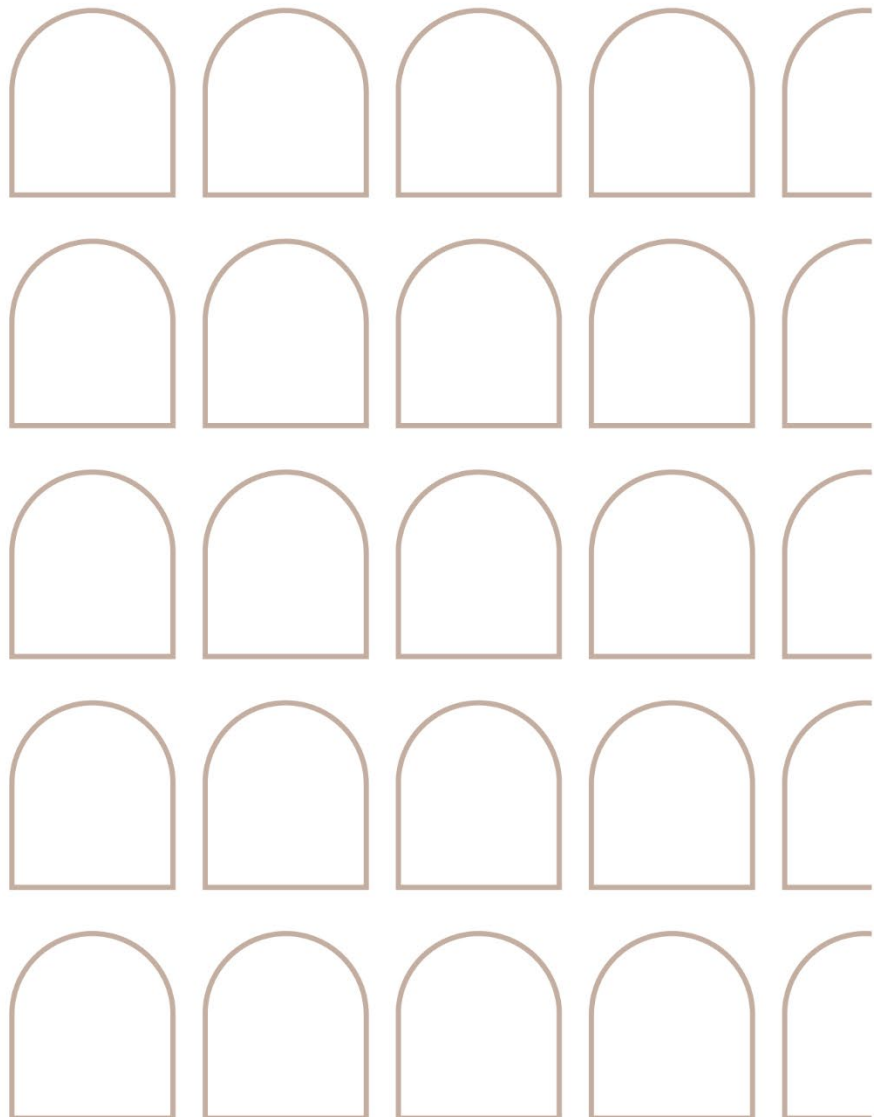


# Child Safeguarding Policy

Office of the Secretary General

CS-V1/R0 (January 2025)



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## 1. Introduction

The European University Institute (EUI) is committed to ensuring a safe and supportive environment for all members of the EUI community and its visitors.

The EUI refers to the EU Charter of Fundamental Rights and specifically, Title III on Equality, article 24 on the rights of the child:

1. *Children shall have the right to such protection and care as is necessary for their well-being. They may express their views freely. Such views shall be taken into consideration on matters which concern them in accordance with their age and maturity.*
2. *In all actions relating to children, whether taken by public authorities or private institutions, the child's best interests must be a primary consideration.*
3. *Every child shall have the right to maintain on a regular basis a personal relationship and direct contact with both his or her parents, unless that is contrary to his or her interests.*

It also takes into consideration the United Nations Convention on the Rights of the Child (1989), specifically article 19:

1. *States Parties shall take all appropriate legislative, administrative, social and educational measures to protect the child from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s) or any other person who has the care of the child.*
2. *Such protective measures should, as appropriate, include effective procedures for the establishment of social programmes to provide necessary support for the child and for those who have the care of the child, as well as for other forms of prevention and for identification, reporting, referral, investigation, treatment and follow-up of instances of child maltreatment described heretofore, and, as appropriate, for judicial involvement.*

The EUI adopts the highest possible standards to ensure the safety and welfare of children coming onto the EUI campus and engaging in EUI activities, recognising that there are a number of circumstances in which children may come onto campus and interact with EUI staff, students/researchers/fellows and outsourced staff. These include but are not limited to:

- Research projects involving direct contact with children;
- Widening participation activities with schools and colleges;
- Community engagement activities;
- On-campus child-care provisions (EUI crèche and summer camps);
- Photography of children used in university marketing and communications;
- The provision of health services;
- First-aid delivery;
- University community events involving the participation of children;
- Children brought onto campus by EUI members;
- Open days;
- Public visits of EUI buildings;

The Child Safeguarding (CS) Policy is owned and managed by the Office of the Secretary General.

## 1.1.Key terms and definitions<sup>1</sup>

- 1.1.1. **Child:** Any individual under the age of 18.
- 1.1.2. **Child maltreatment:** The abuse and neglect that occurs to children under 18 years of age. It includes all types of physical and/or emotional ill-treatment, sexual abuse, neglect, negligence and commercial or other exploitation, which results in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power ([World Health Organization](#)).
- 1.1.3. **Emotional abuse:** The persistent emotional maltreatment of a child or adult at risk, causing severe and adverse effects on the individual's emotional development. This may involve conveying that the individual is worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may involve withholding the freedom to express views, silencing, and mocking them, or placing unrealistic and inappropriate expectations or any prevention of participation in normal social interaction. It may also involve bullying and the infliction of fear.
- 1.1.4. **EUI community/member:** Any person actively affiliated to the EUI and registered with an EUI account, including partners of EUI members.
- 1.1.5. **Neglect:** The persistent failure to meet the basic physical and/or psychological needs of a child or adult at risk, affecting the serious impairment of the individual's health or development.
- 1.1.6. **Outsourced staff:** All those whose place of work is on the EUI campus holding a work contract for outsourced services.
- 1.1.7. **Physical abuse:** A form of abuse causing physical harm to a child or adult at risk, such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or the deliberate induction of illness.
- 1.1.8. **Sexual abuse:** The forcing or enticing of a child or vulnerable adult to take part in sexual activities, not necessarily accompanied by the infliction of violence. They may also involve non-contact acts such as involving individuals to look at sexual imagery, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.
- 1.1.9. **Staff:** Those employed on a work contract by the EUI.
- 1.1.10. **Student/researcher/fellow:** Those enrolled in EUI academic programmes and fellowships.
- 1.1.11. **Visitor:** Any person on the EUI campus not holding a work contract or not enrolled in an EUI academic programme, including those participating only in events, training courses or visiting the campus for whatever purpose.

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<sup>1</sup> Based on definitions emerging from Child Safeguarding Policies in other similar institutions following a benchmarking exercise.

## 2. EUI Child Safeguarding Policy

### 2.1.Aim

This policy aims to protect from harm all children who come into contact with EUI members, services and activities. Harm may constitute any form of maltreatment including emotional, physical and/or sexual abuse and/or neglect.

It informs the EUI community and visitors on the overarching principles adopted by the EUI to ensure the protection of children.

### 2.2.Scope

All members of the EUI community, including staff, students/researchers/fellows and outsourced staff, and visitors to the EUI campus (premises) are subject to the provisions of this CS Policy.

This CS Policy applies to all activities carried out on the EUI campus, and activities off campus that are coordinated by an EUI member.

It is expected that third parties using the EUI premises or facilities for external events are responsible for their own safeguarding policies relating to those individuals involved in their events. In the event a third party receives any allegations regarding an EUI member, the EUI Secretary General shall be informed to enable the EUI to follow up and take appropriate action. Whilst on EUI premises, third parties are expected to adhere to this CS Policy in their capacity as visitors.

### 2.3.EUI principles for safeguarding children

The EUI:

- 2.3.1. Believes that the welfare of children is paramount and maintains the highest possible standards to meet its social, moral and legal responsibilities to protect and safeguard the welfare of children anytime they come into contact with EUI activities.
- 2.3.2. Respects and supports the rights of children, regardless of their age, disability gender, race, religion or belief, sex or sexual orientation, to develop emotionally, intellectually and physically, and to equal rights to protection from any form of maltreatment or neglect.
- 2.3.3. Ensures that children have the freedom to express their feelings and are listened to.
- 2.3.4. Builds a culture in which members of the EUI community treat each other with respect and are comfortable about sharing concerns.
- 2.3.5. Ensures adequate safeguards for ensuring that it safely recruits and selects staff in contact with children, and requires this of outsourced services.
- 2.3.6. Ensures adequate data protection provisions in the processing of data relating to children, in accordance with the EUI Data Protection Policy (President's Decision 10/2019) and with a reference to articles 6(1)(f), 8, 12(1), 40(2)(g) and 57(1)(b) of the EU General Data Protection Regulation (Regulation (EU) 2016/679).
- 2.3.7. Is committed to ensuring the health, safety and security of all children entering into contact with EUI members and present on the EUI campus.
- 2.3.8. Associates this CS Policy to the EUI policies on: [Equality, Diversity and Inclusiveness](#); [Health, Safety and Security](#); [Harassment, Sexual Harassment and](#)

[Bullying](#); [Disabilities and specific educational needs](#); [Whistleblowing](#); [Data Protection](#); and the [Code of Ethics in Academic Research](#).

- 2.3.9. Implements a Code of Conduct for activities carried out with children.
- 2.3.10. Undertakes appropriate risk assessments for activities involving or potentially involving children.
- 2.3.11. Reports and manages via a dedicated procedure issues that arise while working with children during EUI activities or on the EUI premises.
- 2.3.12. Requires that all EUI members report any known or suspected concern or risk regarding the welfare of a child taking place during EUI activities or on the EUI campus, under the procedure outlined in section 3.
- 2.3.13. Requires the written consent of the parent/guardian to publish any media material containing images of the child.

## 2.4. Lead CS Officer

Cases of concern for the welfare of a child during EUI activities or on the EUI campus are reported to the EUI's Lead CS Officer, according to the procedure in section 3.

The Secretary General is nominated as the EUI's Lead CS Officer, supported by the Director of the HR Service as deputy CS Officer. For cases relating to the EUI Creche Services, the deputy CS Officer is the Director of the Real Estate and Facilities Service. They are assisted by the Legal Advisor, who is also the Data Protection Officer, and the Health, Safety and Security Officer (HSSO). The Secretary General may seek the advice and/or assistance from any other person that (s)he deems relevant or necessary for addressing a case brought to his/her attention.

## 2.5. Code of Conduct

The EUI expects the highest standards of behaviour from its EUI members and visitors to its campus when coming into contact with children. To promote transparency and understanding on such standards of behaviour, the EUI establishes the Code of Conduct presented in **Annex 1**.

## 2.6. Risk Assessments

Competent units coordinating new or existing activities involving or potentially involving children are expected to identify any risks to their wellbeing, to be evaluated together with the HSSO. It is important to note that any insurance or legal case may be adversely affected if a risk assessment has not been completed.

- 2.6.1. Competent units complete the Risk Identification Questionnaire in **Annex 2** and send it to the HSSO before the activity takes place. The HSSO discusses the risk assessment together with the competent activity owner.

Essentially, the overall risk assessment:

- a. Identifies the nature, length and frequency of the contact and whether it would be supervised or unsupervised.
- b. Considers whether any children have any particular health needs (allergies, medication, disabilities) that may require attention.
- c. Identifies potential areas for harm and provide adequate mitigating measures.
- d. Determines whether the situation would require a Disclosure Barring Service (criminal records) check.

- 2.6.2. The HR Service is responsible for ensuring the correct measures are in place for recruiting to an EUI post that may come into contact with children, namely evaluating the need for a Disclosure Barring Service (criminal records) check.
- 2.6.3. Units recruiting external collaborators that may encounter children in the execution of their activities for the EUI consult with the HR service on any measures that may need to be implemented in the recruitment of the external collaborator.
- 2.6.4. For outsourced staff, the responsibility for ensuring relevant measures are in place lies with the external provider, ensured by the EUI via appropriate procurement procedures.
- 2.6.5. Risk assessments are completed for each one-off activity that has the potential to involve children. Programmes/projects with ongoing or repeated activities complete one risk assessment to cover the period of the programme/project.

## 2.7. Accountability and responsibilities

- 2.7.1. **Institutional responsibility:** The President is accountable for activities carried out by the EUI and for the overall welfare of all EUI members and visitors while undertaking EUI activities, and as such is accountable for ensuring the awareness and implementation of this CS Policy.

The Secretary General as Lead CS Officer is responsible for:

- a. The correct implementation, review and updating of this CS Policy;
- b. The adequate and appropriate follow up of cases brought to his/her attention;
- c. Providing adequate and appropriate information to the local authorities when required;
- d. Ensuring that appropriate records are kept in relation to the reporting of any safeguarding incidents.

(S)he may delegate tasks and responsibilities to the Deputy CS Officer as appropriate.

- 2.7.2. **Heads of Units:** Heads of Units are responsible for ensuring that the risk identification questionnaires have been submitted to the HSSO and necessary mitigating measures agreed with the HSSO are implemented for EUI activities in their unit that involve or have the potential to involve children and adults at risk.
- 2.7.3. **Individual responsibility:** All EUI members in contact with children must be familiar with this CS Policy and conduct themselves in accordance with the Code of Conduct outlined in **Annex 1**.

Moreover, any EUI member has a duty to report in confidence to the Lead CS Officer any known or suspected concern or risk regarding the welfare of a child or adult at risk during EUI activities or on the EUI campus.

## 2.8. Reviewing and optimisation

The CS Policy is reviewed and where appropriate updated at least every five years.

### 3. Reporting Procedure

- A. In emergency circumstances:** Where there is certain, immediate and/or significant danger to an individual, an individual has suffered or is likely to suffer significant harm, or a criminal act has been witnessed.

**ACTION**



**Contact the police (112).**

If you are unable to contact the emergency authorities, contact the EUI emergency number: 2999 from an internal phone; 055 4685999 from an external phone (see [EUI Emergency Procedure](#))



**Inform the Health, Safety and Security Officer (HSSO)**

The HSSO will inform the Lead CS Officer (Secretary General).

- B. All other cases:** When there is no emergency.

**ACTION**



**Inform the Health, Safety and Security Officer (HSSO)**

[Safety\\_security@eui.eu](mailto:Safety_security@eui.eu)

The HSSO will inform the Lead CS Officer.

In both cases, the Lead CS Officer, or delegated safeguarding lead, carefully considers the information available and decides on the most appropriate course of action. Such situations may require contact with relevant third parties for further investigation and action. It may be required that applicable disciplinary procedures are invoked.

The Lead CS Officer, or delegated safeguarding lead, records and retains all information in a confidential manner in accordance with data protection provisions and completes a clear and comprehensive incident report, including how the allegation was followed and resolved.



# Annex 1

## Code of Conduct

When working with children, EUI members are expected to adhere to the following Code of Conduct:

1. Consider the wellbeing and safety of event participants in advance through proper planning and development of safe methods of working/didactical activities. Take care to consider that identifying vulnerable adults may not be so obvious.
2. Wherever possible, work in an open environment with children where they can be seen by someone.
3. Avoid unnecessary physical contact.
4. Avoid taking a child alone in a car on journeys, however short.
5. Avoid taking a child to the toilet, unless another adult is present or another adult is aware (this may include a parent, group leader or other responsible person).
6. In a situation where you are alone with a child, make sure that someone can clearly observe you.
7. Where possible, set expectations of the standards of behaviour required from participants in an activity/event and encourage them to accept responsibility for their own performance and behaviour.
8. Ask participants in an activity/event to take reasonable steps to ensure their own safety and that of others, and to report any inappropriate behaviour they experience/witness or any concerns that they may have.
9. Report incidents of alleged abuse in line with the guidance as contained within this policy.
10. Report any concerns about poor practice to the relevant Head of Unit, or the Health, Safety and Security Officer or the HR Director as appropriate.
11. Report any accidents to the Health, Safety and Security Officer for recording and investigation where required.
12. It is not appropriate for staff to have a physically or emotionally intimate relationship with a person under the age of 18.
13. EUI members should remember that inappropriate behaviour can also occur over the telephone, email, social media, internet, in online meetings and over collaborative platforms.
14. Instant messaging, social media and other similar functions should not be used to interact with children.
15. Do not make suggestive or inappropriate remarks to or about a child, even in fun, as this could be misinterpreted.
16. Participate in training available to you to support you in your work with children.
17. First aid treatment should be given with more than one adult present unless a delay would be life-threatening.
18. Do not take children to your home or alternative location that is not related to the specific activity/event.
19. Maintain confidentiality about sensitive information where it is appropriate to do so.
20. Where it is necessary for EUI members to take photographs or video images of children, doing so requires adherence to the EUI Data Protection Policy. Where the taking of photographs or video images is optional, consent should be obtained, if possible, from both the children and their parents/carers. In circumstances where the taking of photographs or video images is necessary, another lawful basis of processing (such as legitimate interest) should be relied upon and the individuals (or parents/carers) must be given the opportunity to object.

## Annex 2

### RISKS IDENTIFICATION QUESTIONNAIRE

To be submitted to the Health, Safety and Security Officer before the activity takes place. Only one risk assessment is needed for an entire programme/project in which a series of ongoing or repeated events/activities take place. One-off activities require a risk assessment for each one.

Process/activity Owner: \_\_\_\_\_

Academic Unit/Service: \_\_\_\_\_

| Activity details overview  |  |
|--|--|
| Title of the activity  |  |
| Main premises concerned by the activity  |  |
| Area/Room  |  |
| Date(s) identified for the activity  |  |
| Brief description of the activity (please attach the programme, if available)  |  |
| Indicate the main risk factors related to the current applicable EUI CS Policy   |  |
| EUI reference officer - name (staff, teaching staff, academic)   |  |
| External Responsible person - name (eg. responsible for the external association/organization collaborating with EUI in organising the activity) |  |
| Relevant contacts (mail, phone – both internal and external personnel).  |  |

| Yes | No | n/a | details |
|-----|----|-----|---------|
|-----|----|-----|---------|

| GENERAL HAZARDS MAPPING TOOL               |  |  |  |  |
|--|--|--|--|--|
| Is the activity organised by EUI?          |  |  |  |  |
| Does the activity include non-EUI members? |  |  |  |  |

|   |  |  |  |  |
|---|--|--|--|--|
| Is there any partnership with the organiser (formalised) and/or are there specific agreements between the EUI and external parties?                           |  |  |  |  |
| Are you aware of people potentially addressed by the current CS Policy?   |  |  |  |  |
| If answered yes to the previous, do you have additional information that can be shared according to the EUI Data Protection Policy and GDPR where applicable? |  |  |  |  |
| Are you aware of the EUI third party civil liability/employers civil liability insurance contract details regarding EUI activities?                           |  |  |  |  |
| If answered yes to the previous, do you identify additional risks not covered by the third party civil liability/employers civil liability Insurance?         |  |  |  |  |
| Have you already informed relevant services of necessary provisions (eg. REFs logistics, Comms media coverage, ICT audio/video/network facilities, etc..)     |  |  |  |  |
| Are EUI personnel involved already informed about the code of conduct Annex 1 of EUI CS Policy?   |  |  |  |  |
| Have you shared in advance the EUI CS policy with external party(ies)?  |  |  |  |  |
| Do you have additional information that may be included (please, share information in the cover email used for submitting this form)                          |  |  |  |  |

Reviewer Officer remarks:

| Routing   | Role/Function  | Date and signature |
|-----------|--|--------------------|
| Proposed  | EUI Director of Academic Unit/Service                  |                    |
| Evaluated | Reviewer officer (HSSO/SG Office)                      |                    |
| Approved  | Lead CS Officer (EUI Secretary General or HR Director) |                    |