

F0 Safeguarding Policy Framework

The policy authority for all Safe Spaces safeguarding documents

Status and purpose

This is the policy authority document for the Safe Spaces safeguarding framework. It sets the principles, definitions, legal context, roles, responsibilities and minimum standards that all other Safe Spaces documents implement. When any other document cross-references "F0 Section X," it is referring to a section of this document.

Version: 2.0 (2026). This version incorporates: the tiered DSL model; the Minor/Moderate/Major concern classification framework; all feedback from the Sian Bagshaw external review (2025); and alignment with current EU programme guidance.

A. Introduction and Purpose

This framework supports organisations delivering projects and programmes that involve participants — including children, young people and adults — in safeguarding best practice that meets international standards and legal requirements.

Safeguarding is the responsibility of everyone in the organisation. This framework exists to ensure that responsibility is structured, documented, and effective — not aspirational. It is linked to duty of care, programme quality standards, and where applicable, accreditation conditions for European Solidarity Corps organisations.

This framework must be read by: all senior management; all DSLs and Alternate DSLs; all board members and trustees. Other staff and volunteers receive the adapted versions in F1, P3 and the Quick Reference Cards.

B. Definition and Scope of Safeguarding

Safeguarding means protecting people from harm, abuse and exploitation. In this framework, it covers:

- Children (any person under 18), whose protection is governed by specific statutory frameworks.
- Young people (18-30) whose vulnerability may be increased by isolation, economic dependency, or other factors.
- Adults at risk: adults aged 18 or over with care and support needs who may be unable to protect themselves as a result of those needs (see Glossary for definition).
- Staff and volunteers, who are also entitled to a safe working and volunteering environment.

The term "participants" in this framework covers all people who take part in the organisation's activities. Where a specific measure applies only to one group, this is stated explicitly.

Participants with SEND (Special Educational Needs and Disabilities) may require additional safeguarding considerations due to a disability or learning need. SEND may affect how a concern is communicated, how a disclosure is received, and what support is appropriate. See R4 for adult participants; R3 and R0 for children.



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C. Legal and Policy Context

Legal and policy references in this section are provided for orientation. Because this framework is used across multiple countries, no single national legal system is specified here. Each organisation is responsible for understanding and applying the legal framework in their country. The Country Legal Supplement provides country-specific guidance for key jurisdictions. When legal requirements are unclear, consult your national safeguarding body, legal advisor or National Agency.

C.1 Universal principles

All organisations using this framework are expected to apply:

- The UN Convention on the Rights of the Child (UNCRC) 1989 — especially Articles 3 (best interests of the child), 12 (right to be heard), 19 (protection from violence) and 34 (protection from sexual exploitation).
- The Council of Europe Lanzarote Convention 2007 (protection of children against sexual exploitation and abuse).
- The Istanbul Convention 2011 (preventing and combating violence against women and girls).
- GDPR Regulation (EU) 2016/679 for all data handling.
- The EU Trafficking Directive 2011/36/EU.

C.2 National legal framework

[Insert here the relevant national legislation for your organisation's country. For example: Children Act 1989 and 2004 (UK); Jugendschutzgesetz (Germany); Wet op de jeugdzorg (Netherlands). Use the Country Legal Supplement to find the relevant legislation for each country where your projects operate.]

C.3 Safeguarding culture

Beyond legal compliance, good safeguarding requires a culture in which staff, volunteers and participants feel safe to raise concerns without fear of retaliation; where concerns are treated seriously and acted on promptly; where learning from incidents drives improvement; and where safeguarding is embedded in project design, not added as an afterthought. This framework supports that culture, but culture cannot be mandated — it must be built and maintained through leadership, training, and consistent practice.

D. National Legal Framework

[Organisations complete this section for their own country. The purpose is to ensure that DSLs and senior management understand their specific legal obligations, including mandatory reporting duties, the relevant statutory authorities, and any time-specific requirements under national law.]

E. Programme-Specific Safeguarding Requirements

Where applicable, organisations must also comply with the safeguarding requirements of the programme or funder under which they receive support. For Erasmus+ and European Solidarity Corps (ESC) organisations, these include conditions in the Programme Guide and ESC Guide, and conditions of accreditation for ESC hosting and support



organisations. Non-compliance can result in project suspension, grant clawback or bar from future participation. See P5 Section 5 for the legal basis.

F. Roles and Responsibilities

General principle: everyone in the organisation is responsible for safeguarding and for contributing to a safe, respectful culture. At the same time, specific roles carry specific responsibilities.

F.1 Board / Trustees

- Approve the safeguarding policy and ensure it is reviewed regularly.
- Ensure sufficient resources for implementation: staff time, training budget, expert support.
- Monitor safeguarding risks and serious incidents at governance level.
- Champion a culture where safeguarding is taken seriously and concerns can be raised safely.
- Hold senior management accountable for safeguarding implementation.

See P5 (Board and Trustees Safeguarding Briefing) for full governance guidance.

F.2 Senior Management

- Ensure implementation of the safeguarding policy across all programmes and projects.
- Appoint the DSL and Alternate DSL (or equivalent for the organisation's tier — see F.3).
- Oversee integration of safeguarding into project design, risk management and staff/volunteer management.
- Ensure appropriate reporting to the board and, where relevant, funders and National Agencies.

F.3 Designated Safeguarding Lead (DSL) — Tiered Model

The DSL should be a senior person with appropriate knowledge, skills and authority. The DSL structure uses a tiered model matched to the organisation's size and capacity:

TIER 1

Tier 1: Micro-organisations (1-3 staff and volunteers)

One named DSL. One named external backup — a trustee, board member, peer DSL from another organisation, or paid external safeguarding advisor. The external backup is not involved day-to-day but is contactable within 24 hours and steps in when the DSL is unavailable or has a conflict of interest. The DSL must not conduct an internal investigation alone at Tier 1.

TIER 2

Tier 2: Small organisations (4-15 staff and volunteers)

One named primary DSL. One named Alternate DSL, trained to the same level, internal to the organisation. All case decisions above "no further action" are made jointly by the DSL and Alternate DSL. This is mandatory.



TIER 3

Tier 3: Medium and large organisations (16+ staff and volunteers, or ESC placement organisations)

Named primary DSL with dedicated safeguarding time. Named Alternate DSL with active day-to-day involvement. Optional support pool (2-3 additional trained people who assist but do not hold DSL authority). External safeguarding advisor relationship for complex cases.

Formal documentation for all tiers is in P1 (DSL Appointment and Terms of Reference). Full responsibilities are in P2 (DSL Responsibilities Guide). See also Glossary: Alternate DSL, External Safeguarding Advisor.

F.4 Project Coordinators, Youth Workers and Other Staff

Project coordinators, youth workers, activity leaders and support workers interact with participants directly and regularly. Their specific safeguarding responsibilities include:

- Completing safeguarding induction (P3) before working with participants.
- Maintaining professional boundaries at all times (F2).
- Reporting any concern to the DSL immediately.
- Completing risk assessments (R0, R1) for all activities.
- For project coordinators: completing consent forms (R2), distributing participant safeguarding cards (F4), signing partnership agreements (O1), and monitoring accommodation and travel arrangements (A1, A2).

F.5 Staff and Volunteers (all roles)

- Read and sign the Code of Conduct (F2) before working with participants.
- Complete safeguarding induction (P3) before working with participants.
- Know who the DSL is and how to contact them.
- Report any concern to the DSL. Do not investigate.

F.6 Partners

Partner organisations are required to meet the safeguarding standards in O1 (Partnership Safeguarding Agreement) before any project activities begin. The lead organisation monitors partner compliance throughout the project using O2 (Monitoring Safeguarding in Partnerships). Partner compliance is reviewed at minimum annually and at each project milestone.

G. Recruitment and Selection

Safe recruitment procedures reduce the risk of employing or deploying people who are unsuitable to work with participants. Minimum requirements:

- Two references from previous employers or supervisors, checked before the person starts.
- DBS check, Enhanced DBS check or equivalent national criminal record check, where required by law for the role. See the Country Legal Supplement.
- Interview that includes safeguarding-related questions.
- Verification of identity and right to work.



For senior roles or roles with significant contact with children: more extensive background checking may be required by national law.

H. Raising Awareness and Training

H.1 Training requirements

Safeguarding training is required for all roles. The level and topic of training varies by role. See P4 (Safeguarding Training Plan and Record) for the full training needs matrix.

H.2 Training standards by topic

The following topics form the training framework. DSL-level training covers all topics at specialist level. Staff and volunteer induction covers all topics at foundation/awareness level:

- Safeguarding awareness and the legal framework.
- Recognising abuse, neglect and safeguarding concerns.
- Receiving disclosures and the five-step response.
- The DSL role and seven-step response procedure (DSL and Alternate DSL only).
- Concern classification: Minor, Moderate and Major.
- Recording and reporting (I1, I2, F0 Section L).
- Confidentiality and GDPR in safeguarding (O3, F0 Section K).
- Internal investigation procedure (I4) (DSL and Alternate DSL only).
- Cross-border and partnership safeguarding (O1, O2, A2).
- Child protection measures (R3) — required where under-18s are involved.
- Adult participants at risk (R4) — required where relevant.
- Online and digital safeguarding (A3).

I. Managing Safeguarding Risk

Safeguarding risks should be integrated into the organisation's wider risk management framework. The Safeguarding Risk Assessment Tool (R0) is used for both individual project assessments and organisational safeguarding risk reviews. See R1 (Risk Assessment Guide) for the orientation guide. See R0 for the full tool.

Safeguarding risk is reviewed at minimum annually and before every project begins.

J. Acting on Disclosures, Concerns and Allegations

The organisation must have clear, written procedures for responding to safeguarding disclosures, concerns or allegations. These procedures must be known to all staff, volunteers and participants.

J.1 What Counts as a Concern?

- A direct disclosure from a participant or staff member.
- An observation of inappropriate behaviour, boundary violations or harm.
- A concern raised by a parent, partner organisation or third party.
- Evidence of harm: visible injuries, distress, withdrawal, behavioural changes.
- An allegation against a staff member, volunteer, mentor or another participant.

All concerns are taken seriously and acted upon. If in doubt, report.



J.2 Immediate Response to a Disclosure

See F2 footnote 9 and I3, Chart 1 — Disclosure for exact guidance on the five-step response. Summary:

- Listen carefully. Do not interrupt. Use Psychological First Aid (PFA — defined in the Glossary) if the person is in distress.
- Reassure: "Thank you for telling me." Do not promise confidentiality.
- Do not investigate or ask leading questions. One permitted clarifying question only.
- Record in I1 Part A using exact words and reference codes — immediately if possible, within the same day if not — not real names.
- Report to the DSL as soon as you are able — within the same session or the same day.

J.3 Immediate Safety Measures

If someone is at immediate risk of significant harm:

- **Step 2a:** Take steps to ensure immediate safety (remove from situation, stay with them, call emergency services if needed). Contact the DSL immediately. If the DSL is unavailable and the risk is urgent, call emergency services directly and inform the DSL as soon as possible.
- **Step 2b:** If the concern involves a staff member or volunteer, the DSL consults the Alternate DSL or external backup before taking any action above immediate safety measures. Document the consultation.

Do not confront the alleged perpetrator or put yourself or others at further risk.

J.4 Escalation and Reporting Pathways

Step 1: Report to the DSL. DSL logs in I1 Part B and makes the triage decision.

Step 2: DSL decides on action, which may include: safety planning; precautionary action (step back from role — protective, not punitive); statutory referral; internal management action; or no further action (documented with reasoning).

Step 3: Monitoring plan. Start immediately — not after case closure. Named contact, contact schedule, risk indicators, review date, closure criteria.

For the Listening Ear role as an informal support step before formal escalation: see P3 and Glossary. Not all organisations will have a Listening Ear role.

J.5 Concern Classification

Every safeguarding concern must be classified when it is triaged by the DSL. The classification determines the urgency and nature of the response:

Level	Definition
MINOR	A low-level welfare concern with no immediate risk to safety. May be a single isolated incident or a general impression that something is not quite right.
MODERATE	A single concerning incident, or a pattern of Minor concerns, that requires DSL assessment and may require precautionary action. There is no immediate



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	risk to safety but the concern is more than a minor welfare matter.
MAJOR	An immediate risk to safety, or a concern that clearly meets the threshold for statutory referral — e.g. a crime may have been committed, or a child is at risk of significant harm.

Classification is reviewed at every case review. The DSL applies the balance of probability standard: is it more likely than not that the concern is substantiated? See Glossary: Concern Classification, Balance of Probability.

3.6 When to Inform National Agencies and Funders

Inform the relevant programme body or funder when: a serious (Major) safeguarding incident has occurred; police or social services have been involved; the incident may affect project delivery or programme accreditation; or the grant agreement requires reporting.

K. Confidentiality and Data Protection

Confidentiality in safeguarding means controlled, deliberate, need-to-know sharing — not secrecy. The DSL always needs to know. Beyond the DSL, information is shared only with those directly involved in managing the response.

Confidentiality cannot be absolute: it does not prevent sharing where there is a duty of care to protect a person from harm.

All safeguarding data is special category data under GDPR Article 9. The lawful bases are: Article 9(2)(b) — obligations under employment and social protection law; Article 9(2)(c) — vital interests (protecting life and physical safety); Article 9(2)(g) — substantial public interest (child protection and safeguarding). See O3 (GDPR and Safeguarding Data Handling) for full guidance.

Pseudonymisation is applied in all safeguarding records: reference codes replace real names. Real names are held only in I1 Part C (Identity Index), accessible to the DSL and Alternate DSL only. See GDPR Article 4(5).

L. Recording and Documentation

Accurate, timely and secure recording is a core safeguarding responsibility, not a bureaucratic afterthought. The quality of records may be critical if a case is later reviewed externally, by statutory authorities, or in legal proceedings.

Minimum standards:

- Every concern is logged in I1 Part B before any other action is taken.
- Records use pseudonymisation — reference codes throughout, real names in I1 Part C only.
- Records use the person's own words where available — in quotes.
- Every decision is documented with its reasoning — including when the decision is "no further action."
- Closure decisions are reviewed and signed by both DSL and Alternate DSL.
- Records are retained for the period specified in O3 and the Country Legal Supplement.



M. Digital and Online Safeguarding

M.1 Policy

Digital communication is an integral part of project delivery. The same safeguarding standards that apply in person apply in all digital spaces. Online settings do not reduce the duty of care; in some ways they increase it, because visibility is reduced.

M.2 Resources and guidance

For full online and digital safeguarding guidance: see A3 (Safeguarding in Online and Hybrid Activities).

External guidance: Internet Matters — internetmatters.org; NSPCC online safety guidance — nspcc.org.uk/keeping-children-safe/online-safety; EU Kids Online — eukidsonline.net.

For online ground rules and acceptable use standards: see A3 Section 3 and Section 4.

N. Safeguarding in Partnerships and Transnational Projects

Transnational projects involve multiple organisations, each with their own safeguarding systems, legal contexts and cultures. This creates specific challenges that require deliberate management.

Minimum requirements for all partnerships:

- A Partnership Safeguarding Agreement (O1) signed by all partners before activities begin.
 - Monitoring of partner compliance throughout the project using O2.
 - Cross-border safeguarding response procedure agreed: jurisdiction follows location; the host organisation leads the initial response; referrals to statutory authorities are made in the country where the incident occurred.
 - Data sharing across partners and across borders: vital interests basis under GDPR Article 6(1)(d) and 9(2)(c) applies in urgent situations.
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O. Participant-Facing Information

Participants must have access to safeguarding information before and during every project. This means:

- F4 (Participant Safeguarding Card) given to every participant in their language before the project begins.
- DSL contact details visible at every project activity — on materials, in the venue, and in digital spaces.
- Anonymous reporting channel known to all participants.
- Participants are invited to give feedback on their safeguarding experience as part of the annual review.

P. Review, Learning and Continuous Improvement



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Safeguarding practice is reviewed at minimum annually as part of O4 (Annual Self-Assessment and Review). The review is presented to the board. Learning from individual cases is fed back into the risk register (R0) and training plan (P4). External reviews are commissioned when the organisation's own review identifies gaps it cannot resolve internally.

This framework is reviewed and updated annually. Changes are communicated to all DSLs, senior management and board members.

Document information

F0 Safe Spaces Safeguarding Policy Framework v2.0 (2026).

This framework document is the policy authority for all Safe Spaces annexes (F1-F4, P1-P5, R1-R5, I1-I4, A1-A3, O1-O4) and supplementary documents (IG, R0, Glossary, Quick Reference Cards, Country Legal Supplement, eLearning modules).

Adapted from: NSPCC Safeguarding Policy Framework; IASC Minimum Standards for Child Protection in Humanitarian Action; Council of Europe Guidelines on Child-Friendly Justice; EU Data Protection Board Guidelines (GDPR).



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