

# Safeguarding Policy

Version 1.1, June 2025

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## Imprint

This Safeguarding Policy has been approved and enacted by ECoD NPO as follows.

### **European Capital of Democracy**

#### **Safeguarding Policy - Proof of Internal Enactment**

This Safeguarding Policy has been assessed to be "fully compliant" by ECPAT Vienna in its final version 1.1 from 11 June 2024.

Internally approved and enacted for ECoD gemeinnützige GmbH:

Vienna, 11 June 2024

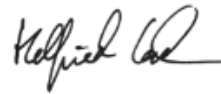


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Disclaimer: This document has been developed between June 2023 and June 2024 under the guidance of ECoD NPO's management by Elene Gagnidze, Alessia Tessoro, Tara Hein as well as Compliance Officer Dunja Ganser and includes inputs of other team members.

## 1. Introduction

European Capital of Democracy (hereinafter “ECoD”) is dedicated primarily to advancing democratic governance and fostering social cohesion across Europe. Our focus lies in promoting and expanding democratic participation and awareness, alongside enhancing established and emerging forms of democratic practice. The organisation's overarching mission involves identifying, developing, advocating, and implementing socio-political innovations to bolster democracy. In alignment with the European Convention on Human Rights, ECoD endeavours to strengthen societal identity and confidence in democratic principles through inclusive practices. Our efforts prioritise engaging a broad spectrum of citizens, particularly emphasising future generations. This includes initiatives to promote education, foster participation, and enhance digital literacy among children and youth. Furthermore, ECoD is committed to championing sustainable solutions that foster peaceful and democratic coexistence within a secure and environmentally sustainable framework.

## 2. Our commitment and values

ECoD is committed to safeguarding all individuals, (irrespective of age, gender identity, disability, sexual orientation, or ethnic origin) from all forms of harm, abuse, neglect, and exploitation, focusing on staff conduct and program implementation in the title-holding European Capitals of Democracy. It excludes workplace harassment, addressed separately, and concerns beyond ECoD-associated personnel in the broader community. The policy underscores ECoD’s dedication to protecting people, especially vulnerable young adults and children.

## 3. Scope of this Policy

This Policy sets out the main rules, practices and values of the ECoD Initiative, coming into force April 2024. Its content is binding for all persons and legal entities operating under the banner of the ECoD Initiative. In particular, it applies to the employees of ECoD NPO and The Innovation in Politics Institute GmbH, including freelancers working for the project. Furthermore, it is particularly binding for the members of the Experts’ Jury, the Advisory Board and the Steering Board, volunteers and unpaid supporters of the project.

The Policy serves as a benchmark on how to protect all people, especially minorities, vulnerable groups and children in our day-to-day work within the ECoD Initiative. Please read this Policy carefully and take the content seriously. If you are unsure about how to implement them in specific cases, we are available to answer any questions you may have.

## 4. Adherence to these Guidelines

### 4.1. Safeguarding Officer

The mission-driven ECoD NPO will appoint a Safeguarding Officer who will make sure that all people engaged in the project comply with these Guidelines. For this purpose, he/she is entitled to conduct unannounced reviews and interviews periodically and schedule individual or group training if need be.

Name of ECoD NPO Compliance and Safeguarding Officer:	Dunja Ganser
Date and period of appointment:	15.09.2023 - until further notice <sup>1</sup>
Contact details:	<a href="mailto:ganser@overtones.eu">ganser@overtones.eu</a>

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<sup>1</sup> Corrected to “until further notice” on 23 July 2025

## 4.2. Communicating this policy

We at ECoD consider it our responsibility to promote safeguarding as a key element of our work across Europe among our community members and group members. In this spirit, we communicate this policy as follows:

- Include it in the Citizen Jury registration consent agreement and share with the network
- Present it in meetings (e.g. Experts' Jury, Advisory Board, team workshops)
- Share with partners for Democracy Year activities and related events
- Working environment (our offices, onboarding guidelines and intranet)

Any changes to this policy will be communicated with relevant stakeholders, and training provided if necessary.

## 4.3. Confidentiality and information sharing

Maintaining confidentiality is crucial throughout the safeguarding process. Information regarding concerns and subsequent case management should only be shared on a need-to-know basis, ensuring secure handling at all times.

## 5. Our safeguarding measures

We believe in the active participation of every individual, recognising their voice and agency. However, we are also aware that certain individuals, groups and children need special attention and protection. Our commitment to inclusivity involves creating safe spaces for dialogue, both digital (on our platforms for members of the Citizens' Jury) and physical during the European Capital of Democracy programme years and our NPO's workshops, trainings and activities. Our goal is to maintain a balance between freedom of expression and respectful discourse. As we navigate this complex journey, we remain dedicated to our mission, ensuring democratic engagement thrives within the boundaries of safety and respect.

We are developing practical guidance to identify and address protection issues, setting clear communication guidelines, and providing support resources. Internally, we raise awareness for this issue in our team meetings and by monitoring the implementation of this Policy. Team members can also reach out to the Safeguarding Officer for support. Externally, we share with our Jury members and offer training via partners, depending on the regional demand. Third parties organising democracy year events need to acknowledge these guidelines and provide a suitable safeguarding policy for their events, as needed.

We will:

- Minimise the risk of harm, exploitation, radicalisation, abuse, and neglect in our work
- Advocate for non-violent conflict resolution and education, particularly within our community
- Foster trusting and respectful relationships with our members
- Provide a safe and supportive environment that encourages active participation and open communication.
- Respond promptly and appropriately to safeguarding concerns, taking decisive action when necessary.
- Empower team and community members to voice concerns and know where to seek assistance if necessary (reporting system)

To meet this commitment, we will ensure that after the initial risk assessment (see Annexes) at the point of implementation of this policy, it will be monitored in the organisation's yearly compliance report and updated every three years, unless the implementation of a new field of activity, event or format requires an interim assessment.

## 5.1. Secure collaboration

Recruiting follows the Innovation in Politics Institute's organisation-wide procedures and standards, including screenings of candidates and personal interviews with all finalists. Documents like work and residence permits, visa etc. are requested as needed. In special cases or if there are specific concerns, criminal records can be requested. We don't offer unpaid internships, all other interns are bound to ECoD NPO's or their educational institutions' contracts for the duration of their work. Board and Experts' Jury recruitment standards are defined in specific documents, and follow a careful process including thorough screening and personal interviews. All persons in a paid or unpaid official function are introduced to and follow ECoD NPO's and the Innovation in Politics Institute's organisation-wide guidelines.

In the work with the members of our Citizens' Jury, we put a strong focus on safe recruitment as a basis for a secure space - including minorities and marginalised groups - across Europe. Approach, selection and activation are based on a complex recruiting concept and aim to minimise the risk of having persons with dishonest intentions on the Citizens' Jury, including a basic screening/vetting of candidates, requesting additional information where needed. Reporting systems are put in place to address any issues with a low barrier and in an effective manner. During the selection process, we carefully ensure that marginalised groups, minorities and other persons in need of protection have the opportunity to speak their mind freely. All Citizen Jurors confirm to have no criminal records regarding violence against human beings and to follow the Code guidelines set out on <https://capitalofdemocracy.eu/guidelines>, including the Safeguarding Code of Conduct.

For all our activities, including those during the Democracy Years, we identify participants in need of protection through our application and registration procedures and ensure that policies are in place and implemented. When working with children and young adults, we rely on partner organisations like schools or youth organisations.

## 5.2. Code of conduct

Our Compliance Guidelines set out the main rules, practices and values of the ECoD Initiative, including a Code of Conduct for employees of ECoD NPO and The Innovation in Politics Institute GmbH, including freelancers working for the project. Furthermore, it is particularly binding for the members of the Experts' Jury, the Advisory Board and the Steering Board, volunteers and unpaid supporters of the project. It serves as a benchmark on how to implement democratic standards into our day-to-day work within the ECoD Initiative. Please read it carefully. In addition, our Diversity and Inclusion Guidelines and Gender Equality Plan include further information. All relevant documents can be found under <https://capitalofdemocracy.eu/guidelines/>.

Regarding the protection of marginalised groups, minorities and children, the individuals bound to the initiative's code of conduct are expected to create and maintain a safe and equitable culture that prevents and opposes harassment, exploitation, and child abuse. Employees and contracted persons are accountable for their actions and will face consequences in cases of serious violations of any of our policies, including this Safeguarding Policy. Consequences may, after consultation with the Safeguarding Officer, in the last consequence include termination of the contract or cooperation. A specific Safeguarding Code of Conduct has been developed as an Annex to this document.

## 5.3. Education, training and management responsibilities

Safeguarding in our sector entails ensuring individuals' health, well-being, and human rights while facilitating a life free from harm, abuse, and neglect. Specifically, it protects people, including children and vulnerable adults, from potential harm through interactions with our staff or programs.

Additional definitions related to safeguarding are available in [Terminology and Glossary](#) and in Annex “24 ECoD Forms of Violence Definitions for Safeguarding Policy”.

Within ECoD NPO, the CEO and the team leads assume a critical role in safeguarding the community's well-being. Responsibilities encompass setting the tone, policy implementation, effectiveness monitoring, response to concerns, and fostering a culture of safeguarding. ECoD prioritises continuous learning and professional growth. Both external workshops and internal meetings serve as invaluable opportunities for our management team and among team members to expand their knowledge and skills across various fields.

We actively participate in external workshops, seminars, and training sessions to stay informed about the latest developments and best practices in relevant areas. These engagements ensure that ECoD remains well-equipped to address emerging challenges and opportunities.

Internally, ECoD fosters a culture of collaboration and learning through regular meetings and workshops. These sessions provide a platform for team members to share insights, exchange ideas, and engage in meaningful discussions on topics pertinent to our mission.

## 6. Children as a special target group

Though not a direct target group for ECoD NPO, children are involved in Democracy Year activities by the title-holding cities and partner organisations. Numerous studies emphasise the significance of meaningful child participation and alignment with the child's best interests.

UNICEF defines child participation as the active engagement of children, individually or collectively, in shaping and expressing their views on matters directly and indirectly affecting them. This transformative process involves transferring power from adults to children, turning them into informed agents capable of influencing decisions impacting their lives.

## 7. Responding to safeguarding concerns

### 7.1. What is a safeguarding concern?

A safeguarding concern is any worry or concern about the safety or well-being of a person because of something seen or heard or information that has been received. This includes any concerns about persons' being involved in the ECoD initiative, especially team members', harmful behaviour or putting others at risk. ECoD will provide support and assistance to complainants and to anyone who has experienced one of the following incidents:

- Someone's behaviour gives cause for concern
- Someone says they are being harmed, exploited, or abused
- Someone indicates they want to harm themselves
- Signs of harm, exploitation, radicalisation, abuse, or violence

ECoD NPO will make sure that all allegations are thoroughly examined, risk assessed, investigated and/or referred to another agency for investigation or reported to law enforcement, ensuring that

- all safeguarding concerns, that come to our awareness or knowledge, are treated seriously
- the concern is reported to the Safeguarding Officer as soon as possible for next steps
- the person concerned or reporting the incident understands the procedure
- no promises are made because it is not our job to solve the case



The Safeguarding Officer will follow the procedures as laid out in this chapter. She/he will

- provide people with safe and appropriate advice, signposting and referring them to services that meet their needs.
- work in partnership with other organisations, including statutory services like the police and social care, to ensure they get the needed help.
- In agreement with the CEO and if appropriate/necessary refer concerns where a child or adult at risk has been or is at significant risk of harm, exploitation, radicalisation, abuse, and neglect to local authority social care or the police.
- Protect confidential information except where the wider duty of care or the public interest might justify making it known.
- Involve external experts if necessary and appropriate.

In any medical emergency or when there is a risk of imminent, significant harm, we will immediately contact the appropriate emergency services and report directly to the Safeguarding Officer.

## 7.2. How can you report a safeguarding concern?

Dunja Ganser is designated as the Safeguarding Officer at ECoD, tasked with spearheading the creation, execution, oversight, and refinement of our Safeguarding Policy. In the event of any concerns or complaints you can:

- Contact the Safeguarding Officer via [safeguarding@capitalofdemocracy.eu](mailto:safeguarding@capitalofdemocracy.eu)
- If you are worried about the safety or welfare of a person, you can call the police (if they are in immediate need of help: 112 or national numbers like 133 for Austria).

Incident Reporting will be drafted as a response to all compliance related contacts.

## 7.3. What happens when a safeguarding concern is reported?

The person we are concerned about will be involved in any discussions about referrals or professional help. This means explaining they need immediate professional help or that we are really worried about their safety or well-being. If the person refuses permission, we will explain that we may still need to share the information with other professionals to ensure they or their family or others affected get the help they need. In exceptional cases, we reserve the right to inform parents or other legal guardians.

We will not need to seek consent to share information if

- it is unsafe to seek (e.g. if it might increase the risk to the child or vulnerable adult).
- it would cause an unjustified delay.
- it would prejudice the prevention, detection or prosecution of a serious crime

## 7.4. Internal Safeguarding Concerns

- Reception: Upon receipt of a report involving an employee or contracted individual, ECoD's Safeguarding Officer promptly acknowledges and assesses the concern.
- Investigation:
  - If necessary, an internal investigation is conducted impartially and confidentially by one or two assigned team members in consultation with the Safeguarding Officer.
  - References to potential serious crimes (abuse, sexual abuse, physical violence) are to be treated according to the legal framework of the very country; some require immediate notification to police or other institutions, like child welfare.
- Support: Individuals involved receive appropriate support throughout the process, including access to counselling services.
- Decision: Based on findings, actions are taken, which may include disciplinary measures or additional training, if formal legal steps are not appropriate / required.
- Documentation: All steps are documented, and policies are periodically reviewed for improvement.

## 7.5. External Safeguarding Concerns

- Reception: ECoD acknowledges and assesses external safeguarding concerns promptly.
- Collaboration: External agencies may be involved depending on the nature of the concern.
- Investigation: Evidence is gathered, and thorough documentation is maintained.
- Support: Individuals affected may receive support, such as counselling or legal advice (within the financial possibilities).
- Decision: Actions are determined based on findings and in consultation with stakeholders.
- Review: Policies are reviewed post-resolution, with follow-up measures implemented as needed for continuous improvement.

## 7.6. When is a safeguarding concern closed?

As the management of the safeguarding concern is concluded, we will complete a final report, incl.:

- clear and comprehensive summary of the concern;
- details of how the concern was followed up (incl. any allegation investigation) and resolved;
- a note of any action taken, and decisions reached;
- a brief report on lessons learnt from this experience;
- recommendations on changes to policy or working practices.

## 8. Monitoring and reviewing

ECoD NPO ensures accessible reporting channels for safeguarding concerns and protecting staff using formal whistleblowing processes outlined in the Compliance Report. The public, partners, and official bodies also accept external complaints. To report a concern, the Safeguarding Officer of ECoD will monitor and review this policy annually or at an earlier opportunity should the need arise. For example, following feedback from relevant external bodies or any updates to legislation.

## 9. Annexes

### 9.1. Associated documents

ECoD NPO has developed a Code of Conduct specifically for Safeguarding, which is published as an Annex to this document. Relevant documents and guidelines include, but are not limited to:

- |   |   |
|---|---|
| • Advisory Board Charter & Agreement        | • ECoD Call document                                    |
| • Auditing Guidelines                       | • Exclusion Criteria (incl. Conflict of Interest)       |
| • Compliance Guidelines + Code of Conduct   | • Experts' Jury Guidelines & Agreement                  |
| • Confidentiality Agreement                 | • Forms of Violence Definitions for Safeguarding Policy |
| • Declaration of Consent for Citizen Jurors | • Gender Equality Plan                                  |
| • Democracy self-evaluation                 | • Legal Framework                                       |
| • Data Security Guidelines                  | • Safeguarding Code of Conduct                          |
| • Diversity & Inclusion Guidelines          |   |

### 9.2. Risk Assessment

ECoD NPO is not working directly with children, young adults and vulnerable groups, but they are important audiences and target groups for the ECoD Initiative. In our initial risk assessment, which is evaluated on an annual basis, we have identified the following risk areas and groups:

- Young or vulnerable members of the Citizens' Jury in certain regions, being visible as ECoD supporters offline, online and on collaboration platforms
- Representatives from marginalised groups, minorities or other vulnerable groups during Experts' Jury visits in cities applying for the title of European Capital of Democracy
- Participants of Democracy Year events who need safeguarding

For details, please refer to the document "Risk Assessment (Annex to Safeguarding Policy)".



### 9.3. Terminology and Glossary

The term **‘child’** will be used to describe anyone under the age of 18. This is the definition established by the United Nations Convention on the Rights of a Child 1989 and the Children Act 1989. Therefore, the term **‘adult’** will be used to describe anyone aged 18 years or over.

The term **‘vulnerable adult’** will be used to describe an adult who has needs for care and support, who is experiencing, or at risk of, abuse or neglect and, as a result of their care needs - is unable to protect themselves. This is the definition established by The Care Act 2014 (also called ‘adult at risk’).

The term **‘community member’** will be used to describe all stakeholders of ECoD, including participants in its events, workshops, and events. Furthermore, it includes coordinators, mentors, experts, coaches, facilitators, speakers, jury members, screening team members, and all other roles that support the delivery of the ECoD initiative.

The term **‘group members’** will be used to describe all volunteers or staff working with or on behalf of ECoD. It also includes contracted individuals or organisations that work with or on behalf of ECoD. In addition, it includes volunteers, staff, contractors, etc.

The term **‘Safeguarding Officer’** will be used to describe one or more Safeguarding Officers who are responsible for leading the development, implementation, monitoring, and adaptation of this Safeguarding Policy at ECoD.

The term **‘abuse’** refers to any action, or failure to act, which results in a significant breach of a vulnerable person’s human rights, civil liberties, bodily integrity, dignity, or general well-being, whether intended or inadvertent, including sexual relationships or financial transactions to which the person has not or cannot validly consent, or which are deliberately exploitative.

The term **‘violence’** refers to all forms of physical or mental violence, injury, abuse, neglect or negligent treatment, maltreatment, or exploitation, including sexual abuse.

### 9.4. Safeguarding legislation

All legal relationships between ECoD NPO and/or The Innovation in Politics Institute and/or partners of the ECoD initiative shall be governed by Austrian law.

Furthermore, ECoD’s Safeguarding Policy draws its main principles from the following international legal framework:

- UN-Convention on the Rights of the Child, 1989;  
<https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child>
- UN-Convention on Rights of Persons with Disabilities, 2006;  
<https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/convention-on-the-rights-of-persons-with-disabilities-2.html>
- Convention on the Elimination of All Forms of Discrimination against Women, 1979;  
<https://www.un.org/womenwatch/daw/cedaw/>

Since we operate across various countries, adhering to specific national laws regarding safeguarding measures under the ECoD framework is crucial. These laws aim to address issues such as violence, abuse, and the protection of minors, individuals with disabilities, and other vulnerable groups within each respective country.

### 9.5. Further information

Any queries or comments about this policy should be addressed to ECoD’s Safeguarding Officer at [safeguarding@capitalofdemocracy.eu](mailto:safeguarding@capitalofdemocracy.eu).