SAFE IN TOWN

STRENGTHENING INTEGRATED CHILD PROTECTION IN SELECTED EUROPEAN MUNICIPALITIES THROUGH THE DEVELOPMENT AND ACTIVATION OF COMPREHENSIVE CITY CHILD SAFEGUARDING POLICIES

D2.4

GENERAL CHILD SAFEGUARDING FRAMEWORK

THE "SAFE IN TOWN" PROJECT

Summary

Every year, millions of children across the world experience violence, often in places where they should feel safest: at home, at school, and in their communities. *Safe in Town* is an initiative dedicated to tackling this urgent issue by supporting the development and implementation of comprehensive, city-level child safeguarding policies.

The project works with selected municipalities in Italy, Greece, Cyprus, and Portugal to create safer, inclusive, and child-friendly environments. It promotes a coordinated, multi-disciplinary approach, bringing together local authorities, service providers, communities, and children themselves to prevent violence, strengthen protection systems, and ensure effective responses when risks arise.

Following the EU Recommendation on integrated child protection systems, *Safe in Town* fosters innovative policies, procedures, and practices, including child- and gender-sensitive referral mechanisms and evidence-based strategies. By building local capacities and a strong culture of safeguarding, the initiative aims to reduce risks, protect children, and empower them to thrive safely in their communities.

I. INTRODUCTION

This document was developed by Keeping Children Safe within the framework of the Safe in Town Project, in collaboration with Defence for Children Italy. Given the experimental and evolving nature of the project, the document is intended to be dynamic and adaptable, allowing for further refinement and contextualisation as lessons emerge from practice.

Under the **United Nations Convention on the Rights of the Child** (UNCRC), national governments have a legal obligation to ensure the protection of all children from all forms of violence, abuse, exploitation, and neglect. To fulfil this obligation, States are required to establish and maintain a comprehensive child protection system. Such a system encompasses a coordinated set of laws, policies, regulations, and services across all relevant sectors – including social welfare, education, health, justice, and security – to prevent and respond to child protection risks in a timely, effective, and rights-based manner.

While **child protection responsibilities** are often shared across government bodies, with local authorities, non-state actors, and community groups playing critical roles in service delivery, this fragmentation underscores the need for strong coordination mechanisms. Effective protection requires clear roles and referral pathways, routine inter-agency collaboration, and the implementation of safeguarding standards at all levels.

However, at the **local level**, these systems too often fall short in ensuring that every child is protected and respected. One of the main contributing factors is the lack or inadequate implementation of child safeguarding policies and procedures by the key actors involved in children's lives – including public institutions, private entities, and community-based structures.

These guidelines aim to support **municipal actors** in understanding and fulfilling their responsibilities toward children. They offer a practical, user-friendly, and flexible framework to interpret and apply national laws and procedures in a way that strengthens local child safeguarding capacity. Grounded in a child rights-based approach, the document provides tools and knowledge to guide the design, development, and implementation of coordinated, multidisciplinary and multi-sectoral child safeguarding policies at the municipal level.

The overarching goal is to ensure **prevention**, **early identification**, and **appropriate response to all forms of violence against children**, by providing a common foundation for developing comprehensive Municipal Child Safeguarding Policies. These guidelines are also intended to contribute to strengthening local child protection systems and promoting a culture of shared responsibility, accountability, and respect for the rights and dignity of all children.

WHO IS THIS FRAMEWORK FOR?

This framework is designed to support partners of the Safe in Town project in developing relevant contextual child safeguarding measures and the City Child Safeguarding Policy (CCSP) as well as the subsequent piloting phase of the project.

CORE PRINCIPLES AND SCOPE

Ten cross-cutting principles set out here, which taken together, will help in the development of a forward-looking and holistic child safeguarding policy at municipal level.

A child safeguarding framework at municipal level should:

1. Ensure children have equal rights to protection from harm.
2. Recognise that everybody has a responsibility to support the protection of children.
3. Acknowledge that all relevant stakeholders and key players have a duty of care to children with whom they work, are in contact with, or who are affected by their work and operations.
4. Acknowledge that if stakeholders and key player work with partners, they have a responsibility to help partners meet the minimum requirements on protection.
5. Ensure that all actions on child safeguarding are taken in the best interests of the child, which are paramount.
6. Respect and be consistent with the fundamental rights of children as enshrined in the UN Convention on the Rights of the Child and other key international conventions and laws; respect and be consistent with existing, similar and related domestic laws and strategies in place such as child abuse laws or child safety strategies.
7. Be developed with the active participation of all relevant stakeholders and key players, including children, addressing their needs and responsibilities and meeting the needs of minority and marginalised groups.
8. Be set at the highest level, which will be responsible for assigning relevant roles and responsibilities and allocating sufficient human and financial resources.
9. Guide efforts of stakeholders and key players to empower and educate children on safeguarding and their right to be protected from harm and exploitation.
10. Be developed with a view toward a greater understanding and effective application of child safeguarding by all key stakeholders in a national child protection system.

"Do no harm" principle

"Do no harm" is a foundational ethical principle used across humanitarian, development, medical, and safeguarding work. At its core, it means avoiding harm while trying to help. It includes:

- �położ Mitigation of negative impact: ensuring that interventions do not unintentionally worsen the situation of children, but rather work to improve it while promoting concerted actions based on the best interests of the child.
- ✗ Context sensitivity: understanding the local dynamics, legislation and possible specific conditions of vulnerability.
- ✗ Keeping children safe: Ensuring that all interventions are safe for children and respect their dignity and well-being.
- ✗ Engagement of communities: decision-making should involve the people impacted by the action.
- ✗ Monitoring: Tracking down the progress of activities and adjusting them accordingly if needed.

The best interest of the child principle

The best interest of the child is a core principle in international law, child protection, and safeguarding. It means that in all decisions and actions concerning a child, the child's well-being, safety, and development must be the top priority. It includes the following:

- ✗ Prioritization of child rights and needs
- ✗ Consideration of children's views
- ✗ Holistic approach and access to education, healthcare, etc.
- ✗ Consideration of family and cultural context

Child participation

Child participation is the process in which children and young people become actively involved in identifying and solving problems they find in their living environment to improve the health and wellbeing of themselves and others. Children have the right to participate in matters that affect their lives. Participation is one of the four key principles in the United Nations Convention on the Rights of the Child (UNCRC): survival, development, protection, and participation. Article 12 is the most significant for participation. For participation to be effective, children should be given opportunities to participate and express their views in a format they choose; adults have a responsibility to listen to and consider children's views when decisions are being made that affect them.[1] The scope of this framework extends to any harm that children are exposed to through governmental and nongovernmental organisations, covering a broad range of risks that threaten the safety and wellbeing of children. It is a complex challenge that must be approached from multiple angles.

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[1] For more information on Safe in Town's approach to child participation please refer to the document "The Child Advisory Board In The Safe In Town Project Methodological Considerations, Activities' Overview And Useful Templates"

This framework should apply to all municipal actors working with or for children including kindergartens, schools, sports programmes and cultural centres, after school programmes, alternative care facilities, shelters, hospitals, social services, local child councils/assemblies/formal participation mechanisms, victim support centres, ombudspersons for children, institutions and programmes involved in concerning children and justice, as courts, police, and civil society actors responding to child protection issues.

In addition, child safeguarding must be based on an understanding of both general and local-specific risks, threats and harms facing children, including in emergency situations, such as natural disasters and armed conflicts.

GLOSSARY OF TERMS/DEFINITIONS OF HARM

These references are included to ensure that terminology is adapted to each country's specific context, while maintaining alignment with internationally recognised standards:

Accountability

Accountability refers to the obligation of adults, organisations, and institutions to uphold and protect children's rights, and to take responsibility for their actions or failures to act. It includes mechanisms to monitor behaviour, report concerns, investigate violations, and ensure appropriate responses — including remedies and sanctions — when children's rights are not respected.

Child

According with the Convention on the Rights of the Child a child means every human being below the age of eighteen years.

Child Abuse

According to the World Health Organisation, child abuse has serious physical and psychosocial consequences which adversely affect health. It refers to "any act or failure to act that violates the rights of the child, that endangers his or her optimum health, survival or development".

Child Protection

Child Protection refers to the protection of all children from violence, exploitation, and abuse, per Article 19 of the United Nations Convention of the Rights of the Child (UNCRC). In the international context it describes the work being undertaken to strengthen laws, policies, and systems designed to protect children in each country, in his or her own family and community.

According to UNCRC Article 19, child protection requires action.

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.

Such **protective measures** should, as appropriate, include effective procedures for the establishment of social programs 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.

Child Safeguarding

Child Safeguarding is the responsibility that organisations and in this specific case the municipality has to make sure their staff, operations, and programmes do no harm to children, that is that they do not expose children to the risk of harm and abuse, and that any concerns actors might have about children's safety within the communities in which they work, are reported to the appropriate authorities.

Child Safeguarding Policy

A Child Safeguarding Policy is a formal commitment by an organisation to protect all children from harm, abuse, neglect, exploitation and any child rights' violation. It sets out the organisation's approach to preventing harm and responding appropriately to concerns, based on the principles of the UNCRC and the best interests of the child. The policy includes clear roles, responsibilities, procedures, and accountability mechanisms to ensure that children's rights to protection, safety, and participation are respected in every context where the organisation operates.

Health and wellbeing

According to the World Health Organisation, "health is a state of complete physical, mental and social wellbeing and not merely the absence of disease or infirmity".

Municipality

A municipality is a network of public institutions, services, and local actors that hold responsibility for local governance within a defined territory. It includes the local authority and other relevant stakeholders — such as social services, education, health, law enforcement, and civil society — working together to deliver services, uphold rights, and respond to the needs of the community, including children and families.

Policy

A policy is a formal statement of principles, values, and intentions that guides decisions and actions within an organisation or institution. From a child rights perspective, a policy should be designed to promote, protect, and realise children's rights, ensuring their best interests are central to all planning, service delivery, and decision-making.

Prevention

Prevention includes all elements that can guarantee, in a general or specific way, adequate and protective conditions in relation to the age and developmental capacity of the child.

Procedures

Procedures are the specific, step-by-step actions to be followed in the implementation of a policy. In the context of child safeguarding, procedures ensure clarity, consistency, and timeliness in preventing and responding to concerns or incidents involving the safety and well-being of children. They provide practical guidance to staff and partners on how to recognise, report, and manage risks or violations.

Protection

Protection includes all general or specific elements that can minimise or reduce a potential or actual risk of violation or abuse. This means that after identifying a potential or actual risk of harm, specific actions or procedures are activated to protect the child from a potential or actual risk of harm.

Referral system

A referral system can be defined as a comprehensive institutional framework linking various entities with well-defined and precise (though in some cases overlapping) mandates, responsibilities and powers within a network of cooperation, with the overall objective of ensuring protection and providing support to the children concerned, helping them in their full recovery and empowerment, the prevention of future harm and the prosecution of abusers. The referral mechanisms work on the basis of efficient lines of communication and establish clearly defined paths and procedures with clear and simple sequential steps.

Response

This refers in this context to an intervention that includes all actions implemented to counter an established risk or violation of the child's rights immediately and with the aim of re-establishing appropriate conditions of wellbeing, protection and safety.

If action is taken in the event of harm, all designated procedures and the respective referral system must be activated to meet the immediate needs of the child but also help the child to emancipate from the abuse. In this way, the aim is to break the cycle of violence and re- enter the cycle of protection.

The importance of active listening and communication

Listening to children and adolescents and their story is a key element in recognising, respecting, and encouraging their participation. This approach aligns with Article 12 of the United Nations Convention on the Rights of the Child, which affirms the right of every child to express their views freely in all matters affecting them, and for those views to be given due weight. Considering the personal history of each child helps to avoid stereotypes, which are nurtured and reinforced through the creation of categories based mainly on needs.

Forms of Harm and Violence Against Children

In every context and culture, **children may be exposed to various forms of harm**, all of which constitute violations of their rights to protection, care, and dignity as enshrined in the **United Nations Convention on the Rights of the Child (UNCRC)**. These violations can occur in different settings – including within the family, in institutions, communities, faith-based environments, and increasingly in online spaces.

Children may experience harm at the hands of adults or peers, and in some cases, harmful practices may be **normalised or justified by tradition or custom**, despite the significant physical and emotional damage they cause. Practices such as **female genital mutilation (FGM)** and **child, early and forced marriage** are widely recognised as serious human rights violations and must be addressed with urgency and cultural sensitivity.

A **rights-based approach to safeguarding** requires recognising all forms of violence as infringements on children's inherent dignity and prioritising their views, best interests, and evolving capacities in both prevention and response efforts.

The following definitions can help guide those responsible for the protection and safeguarding of children:

Physical Abuse

The infliction – or risk – of physical harm by another person, whether an adult or a child. This can include acts such as hitting, shaking, poisoning, drowning, or burning. Physical harm may also occur when a caregiver fabricates or deliberately induces illness in a child.

Sexual Abuse

Forcing or enticing a child to take part in sexual activities that he or she does not fully understand and has little choice in consenting to. This may include, but is not limited to, rape, oral sex, penetration, or non-penetrative acts such as masturbation, kissing, rubbing, and touching. It may also include involving children in looking at, or producing sexual images, watching sexual activities, and encouraging children to behave in sexually inappropriate ways.

Child Sexual Exploitation

A form of sexual abuse that involves children being engaged in any sexual activity in exchange for money, gifts, food, accommodation, affection, status, or anything else that they or their family needs. It usually involves a child being manipulated or coerced, which may involve befriending children, gaining their trust, and subjecting them to drugs and alcohol. The abusive relationship between victim and perpetrator involves an imbalance of power where the victim's options are limited. It is a form of abuse that can be misunderstood by children and adults as consensual. Child sexual exploitation manifests in different ways. It can involve an older perpetrator exercising financial, emotional or physical control over a young person. It can involve peers manipulating or forcing victims into sexual activity, sometimes within gangs and in gang-affected neighbourhoods. It may also involve opportunistic or organised networks of perpetrators who profit financially from trafficking young victims between different locations to engage in sexual activity with multiple men.

Neglect and Negligent Treatment

A **persistent failure to meet a child's basic physical, emotional, and developmental needs**, taking into account the context and available resources. This includes the failure to provide adequate nutrition, shelter, education, healthcare, and protection from danger. It may also involve a lack of supervision, exposure to unsafe environments, or neglect during pregnancy (e.g., due to substance misuse). Neglect can be particularly severe in the case of children with disabilities.

Emotional Abuse

The **persistent denial of a child's emotional needs and rights**, which undermines their self-worth and development. This includes degrading or humiliating treatment, bullying (including online), scapegoating, verbal abuse, rejection, or acts that intimidate, isolate, or discriminate against the child. Emotional abuse may be more difficult to identify but has long-term impacts on a child's wellbeing.

Commercial Exploitation

The use of a child in activities that **benefit others to the detriment of the child's health, education, development, or dignity**. This includes child labour, trafficking, and any form of economic exploitation where children are treated as commodities rather than rights-holders. Such exploitation interferes with their right to education, leisure, and protection from economic harm.

THE INTERNATIONAL LEGAL FRAMEWORK

To provide a foundation for common understanding, this framework provides a brief **overview of the International Child Protection Legal Framework** as it applies within the **European Union (EU),** structured from the highest to the operational levels.

International Law

These documents shape the legal foundation for child protection and apply across all member states that have ratified them. They guide and inform national and EU-level laws.

International Human Rights Law

- ✗ Convention on the Rights of the Child (CRC) (1989): Core instrument for child rights; Articles 3, 19, 34, 39 directly relate to protection from violence, abuse, exploitation.
- ✗ Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) (1979): Protects girls' rights and includes obligations to prevent violence against girls.
- ✗ Declaration on the Elimination of Violence Against Women (DEVAW) (1993): Non-binding but reinforces obligations under CEDAW and CRC.

International Refugee Law

- ✗ 1951 Refugee Convention and 1967 Protocol: Provides protection for refugee children, including non-refoulement and access to services.

International Humanitarian Law

- ✗ Geneva Conventions (1949) and Additional Protocols (1977): Protect children in armed conflict.
- ✗ CRC Optional Protocol on the Involvement of Children in Armed Conflict (OPAC) (2000).

Regional Treaties and Frameworks

These reflect international obligations but are legally binding within the EU and broader Europe.

- European Convention on Human Rights (ECHR): Enforced by the European Court of Human Rights.
- Lanzarote Convention (2007): On the Protection of Children against Sexual Exploitation and Sexual Abuse.
- Istanbul Convention (2011): On preventing and combating violence against women and domestic violence.
- European Social Charter: Protects economic and social rights.

EU Legislation and Policy

- EU Charter of Fundamental Rights: Article 24.
- EU Strategy on the Rights of the Child (2021 – 2024).
- European Parliament Resolution (2015) on children's rights.
- Directive 2012/29/EU of the European Parliament and of the Council of 25 October 2012 establishing minimum standards on the rights, support and protection of victims of crime
- European Recommendation on Developing and Strengthening Integrated Child Protection Systems (2024).

National law

Each EU member state applies international and regional obligations into its context of child protection legislation, including:

- Child welfare and child protection laws
- Criminal laws on child abuse and exploitation
- Juvenile justice frameworks
- Asylum and migration policies
- Education and health laws affecting children

Organisational Policies and UN Guidelines

- UN Secretary-General's Bulletin: Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13)
- Inter-Agency Standing Committee (IASC) Guidelines
- INSPIRE Framework by WHO and partners

THE INTERNATIONAL CHILD SAFEGUARDING STANDARDS AT MUNICIPAL LEVEL

Everyone involved in working with children has a duty of care towards them. We must all recognise the risks to children of abuse and exploitation and our responsibilities to keep them safe. In building safe environments for children where their rights are respected and they are protected from harm, municipalities have an important part to play.

The International Child Safeguarding Standards, developed by Keeping Children Safe, originated in 2002 from a coalition of relief and development charities. The standards are rooted in the UN Convention on the Rights of the Child and are designed to help organisations and institutions meet their responsibilities in protecting children from harm. They are used across various sectors to ensure best practices in safeguarding and accountability. The standards emphasize the importance of clear policies, staff training, and robust procedures for reporting and responding to concerns about child abuse.

The standards describe good practice to ensure programmes, operations, staff, and other stakeholders do not put children at risk of harm and ensure relevant responding when concerns and incidents arise. As such, these standards provide a comprehensive benchmark for preventing harm to children.

The Standards have been written in a way that makes them relevant and achievable in all contexts. However, they may be more difficult or challenging to implement in some countries and local contexts than in others. Examples of some of the difficulties that have arisen in applying the Standards locally are:

- Reporting abuse to local or national authorities may not be straightforward if the reports are not handled properly. There are, however, organisations working nationally and locally that can provide advice on reporting cases, and local mapping can identify these.
- Applying standards of practice, which are not supported by national law; for instance, where the age of consent is less than 18 years and where young people under 18 are legally able to work can be problematic. However, The ICS are designed to prevent harm to all children under 18 and behaviour is expected to adhere to this standard.

There are enormous variations in local practice and circumstances but experience in applying the Standards in different contexts demonstrates that they do not need changing or diluting because of cultural or contextual differences. Nor do practices that are harmful to children have to be tolerated or condoned.

Locally, discussions should be carried out on how best to apply the standards in the local context, what behaviour local actors should demand of their own staff and partners and how they want to be credible in this process.

This means making sure that everyone connected to the municipality are aware of their safeguarding roles and responsibilities, and that they always behave with the utmost professionalism and integrity. For this to happen consistently, we need to have a systematic approach to child safeguarding.

Advantages of implementing the International Child Safeguarding Standards:

- �"" Children are more protected: No standards can offer complete protection for children, but following these Standards minimizes the risk to children of harm.
- �"" Staff and associates are more protected: By implementing these Standards, all staff and associates will be clear about how they are expected to behave with children and what to do if there are concerns about the safety of a child.
- �"" The Municipality and its reputation are more protected

STANDARD I: POLICY

Municipality and its actors whose work affects children need to develop a clear child safeguarding policy that focuses on promoting the wellbeing of the child, prevents harm to children and outlines what measures are in place to respond when safeguarding concerns arise.

Why should you meet this Standard?

Developing a child safeguarding policy makes it clear to everyone that children must be safeguarded and not put at risk of harm because of your contact with, or impact on, children.

How to meet the Standard?

1. Designing the policy

A good child safeguarding policy is developed through consultation with staff and associates and, where appropriate, children and communities. If you want your safeguarding policy to be effective, you need to make sure it is central and has been consulted with all important stakeholders. Use a working group or task team to lead on the development of the policy. To design your policy, you will need to complete the mapping process as described in the 'Mapping Policies, Procedures, and Referral Systems at Municipal Level' document created especially for the Safe in Town project.

Child safeguarding policies should:

- �», Express your child safeguarding culture and philosophy. A child safeguarding policy should set out what you want to say about how you keep children safe.
- �», Recognize the needs of all children to be safeguarded. A child safeguarding policy should state explicitly your commitment to safeguarding all children, irrespective of ability, ethnicity, faith, gender, sexuality, and culture. The policy should also recognize that types of risk may vary according to the child and that the means of addressing risks may also vary.
- �», Always apply to all staff and associates. A child safeguarding policy should make explicit that preventing harm to children should be a commitment at work and outside of work.
- �», Identify and manage risk. A child safeguarding policy should describe how risks are identified and managed. Having a child safeguarding policy does not mean that all harm to children is eliminated. It means that you can minimize risk and address concerns and incidents appropriately when they arise.

2. Writing the policy

The policy should be written in a manner that is globally and locally appropriate. Where necessary, it needs to refer to other policies which support child safeguarding. The policy should contain, or refer specifically to, a code of conduct for staff and associates.

3. Signing off on the policy

The senior management body needs to sign off on the policy. This means they have committed to providing leadership on child safeguarding - ensuring that it is implemented fully, that all concerns or incidents are addressed appropriately, and that children, staff and associates receive the support required to meet commitments and obligations. A date should be set to review the policy, and a process should be put in place to evaluate its impact.

4. Disseminating and publicizing the policy

The policy should be made available to all staff, associates, key municipal actors, stakeholders, partners, children, and communities.

Ways of providing evidence

The following documents can be used to provide evidence that the Standard has been met:

- �», A copy of the policy signed by the management body.
- �», Examples of ways the policy has been publicized and promoted, including partners, children and communities.

STANDARD 2: PEOPLE

Municipality places clear responsibilities and expectations on its staff and associates and supports them to understand and act in line with these.

Why should you meet this Standard?

- Everyone in contact with children has a role to play in their safeguarding and wellbeing. They can only do this confidently and effectively if they are aware of the issues and have the necessary understanding and skills to keep children safe.
- Everyone associated with the municipality should know how to keep children safe and have appropriate learning opportunities to develop and maintain the necessary attitudes, skills, and knowledge to keep children safe.
- Children, families, and all citizens should understand the municipality's commitement to child safeguarding and what to do if concerns arise.
- Key staff are designated (including director level) as 'focal points' with clearly defined roles and responsibilities.
- Recruitment processes have strong child safeguarding measures in place.
- There are written guidelines for appropriate and inappropriate behaviour of adults towards children, and of children towards other children.
- There are guidelines for engaging partners, communities and children on child safeguarding.

How to meet the Standard?

1. Designating roles and responsibilities for child safeguarding

There should be a named designated person who is responsible for making sure that the child safeguarding measures are integrated throughout the organisation and acts as a focal point. At each appropriate level or setting there should be a named person who people can talk to about child safeguarding matters. It is good practice to identify the designated person, and everyone should know how to contact him or her.

The designated people should not normally have sole responsibility for the management of child safeguarding. It is always better to ensure there are other lines of accountability and responsible people so there is not one reporting route only.

2. Recruitment and engagement of staff and associates

You should outline your commitment to child safeguarding in recruitment adverts, interviews and as part of contracts of employment. Everyone should be recruited through clear job or role descriptions that include a statement on the position, roles and responsibilities to meet the requirements of the child safeguarding policy. All interviews should include a discussion on child safeguarding, the candidate's understanding of this and the overall commitment. Those whose work will have direct contact with children, or gain access to children's information, should be dependent on references and/or relevant criminal record checks, if applicable.

3. Guidelines for behaviour protocols

A code of conduct is a clear and concise guide of what is and is not acceptable behaviour or practice towards children.

Everyone should agree to the code of conduct when they are employed and/or start their job. It is an essential element of a child safeguarding policy and, when implemented properly, should reduce, or limit the risk of child abuse occurring. It should also be made clear what disciplinary measures will be taken if the code is breached or not followed correctly.

Everyone needs to follow that code within and outside the workplace. This means adopting appropriate behaviour themselves and reporting on concerns they have about a child whether in work or outside. This can often present a challenge for staff, but it is more important to create a safe environment for children.

4. Training and education

It is essential that all those employed or engaged have access to regular training on child safeguarding that is appropriate for their role and responsibilities, beginning at the induction/orientation stage.

Staff with designated responsibilities for child safeguarding should have access to advice and support where concerns or incidents arise.

5. Agreements with partners

All partners need to agree to a commitment to keeping children safe that is appropriate to that partnership. This means making sure that:

- Partners are clear about the nature of the partnership relationships that they enter.
- There is a sound assessment of the partner's contact with, and impact on children during the partnership and what this means for child safeguarding agreements.
- Agreement is reached on how you and your partners will support one another to achieve compliance and competence around child safeguarding, including the provision or exchange of resources.
- There is clarity in partnership agreements on reporting and responding to child safeguarding concerns. For instance: what is the line of responsibility for reporting between partners? What are the implications for the partnership agreement of concerns being reported and confirmed?
- Terminating agreements if a concern has arisen should be avoided. Termination should be dependent on the partner's mishandling of the concern.

Ways of providing evidence

- A copy of training plans, course attendance records and course evaluations.
- Copies of child-friendly information.
- Lists of contacts for specialist advice and information.
- Partnership agreements.
- Codes of conduct.
- Guidelines on reporting mechanisms for all target groups including staff, partners, children and communities.

STANDARD 3: PROCEDURES

The municipality promotes a child-safe environment by implementing child safeguarding and wellbeing procedures that are applied consistently across its territory and among various actors.

Why should you meet this Standard?

- Child safeguarding measures need to be integrated across all areas of work.
- Local mapping exercises need to be carried out and provide information on the legal, social welfare and child protection arrangements.

How to meet the Standard

- Child safeguarding risk assessments and mitigation strategies are incorporated into existing risk assessment processes at all levels.
- Child safeguarding and well-being measures must be fully integrated into the municipality's systems (planning, recruitment, partner agreements and management, etc.) across different sectors and local contexts.
- While tailored to the local context, these measures should also align with relevant global and regional child protection standards.

Ways of providing evidence

- Risk registers which have recorded risk assessments and mitigating strategies.
- Information from local mappings.
- Reporting flowcharts.

STANDARD 4: ACCOUNTABILITY

The municipality has in place measures and mechanisms for monitoring and reviewing safeguarding and wellbeing measures and to ensure both upward and downward accountability in relation to child safeguarding and wellbeing.

Why should you meet this Standard?

It is important to measure child safeguarding performance to find out if measures and efforts are being successful.

How to meet the standard?

If a municipality has integrated child safeguarding into your systems and processes, it will be relatively straightforward to report regularly on whether these measures are working, during regular reports on your performance.

If child safeguarding has been integrated into the municipality systems and processes, these should be audited alongside the other areas.

External verification of a municipality child safeguarding measures will ensure that everything is in place.

Ways of providing evidence

- ⚐ Risk registers
- ⚐ Monitoring reports

2.

HOW TO PREPARE FOR THE ADAPTATION AND DEVELOPMENT OF THE CHILD SAFEGUARDING FRAMEWORK AT MUNICIPAL LEVEL?

Before a child safeguarding policy can be drafted, the proper groundwork needs to be carried out so that the policy is as comprehensive as possible.

What is the aim?

Effective child protection systems are essential to uphold the rights of all children. Protecting children from all forms of violence, abuse, exploitation and neglect is not only a right in itself, but also a prerequisite for the fulfilment of other rights — including health, education, participation and development — and for advancing equity and social justice.

A rights-based child protection system requires a comprehensive legal and policy framework; a well-functioning coordinating body; accessible and child-friendly justice mechanisms; meaningful child participation; a trained and accountable workforce; adequate and sustainable resources; clear standards; effective monitoring and accountability mechanisms; and reliable, disaggregated data systems.

1. Is there agreement among stakeholders and key players as to the problem that needs to be addressed?

2. If so, is there the political will and support to tackle the problem?

3. If not, has a strategy been developed to garner that support?

What is the legal framework?

1. Has a review been carried out to identify gaps in the law, standards and best practice? More specifically:

    - Has a legal mapping been carried out of your country's relevant child protection/child safeguarding relevant laws, including international and regional conventions?
    - Has a review been carried out of international standards relevant to child protection and child safeguarding?
    - Has a review been carried out of international best practice?

What are traditional practices that protect/harm children?

Across the world, cultural, social, and religious traditions influence how children are treated. **Some practices promote children's rights and wellbeing, while others undermine or violate them.** Harmful practices such as child marriage, forced marriage, female genital mutilation, child abuse linked to faith or belief, and so-called 'honour'-based abuse constitute serious violations of children's rights. These practices can cause long-lasting physical, emotional and psychological harm.

Despite their harmful nature, such practices may become normalised within communities, losing their recognition as abuse and instead being framed as customary or even necessary rites of passage. This normalisation can lead to tolerance, inaction or even legal gaps in protection - for example, when corporal punishment is legally prohibited but not enforced due to prevailing social attitudes.

In line with a child rights-based approach, it is essential to critically examine all traditional practices - both those that harm and those that protect children. **Identifying and strengthening positive cultural norms and community-based child protection mechanisms, while challenging and transforming harmful practices, is key to ensuring that all children grow up in safe, supportive, and rights-respecting environments.**

Has a comprehensive review been undertaken to map traditional practices that both uphold and violate the rights of children? Such an assessment is essential to inform culturally sensitive, child-centred interventions that prioritise children's best interests and active participation.

Have stakeholders been identified?

The **development of a child safeguarding policy at municipal level must be grounded in a child rights-based approach, ensuring that all relevant stakeholders are meaningfully involved in the process.**

Stakeholders - including individuals, communities, institutions, and organisations - play different roles in either promoting or posing challenges to the realisation of children's rights to protection and wellbeing. Some stakeholders may actively support the development of a safeguarding policy, recognising its potential to uphold children's dignity, safety and participation. Others may hold concerns, for example perceiving that the framework challenges established norms, traditional practices or religious values.

Engaging all stakeholders with respect, transparency and clarity around children's rights is essential. Duty bearers have a responsibility to address concerns through dialogue, capacity building and evidence-based communication, while remaining firmly anchored in the principles of the UN Convention on the Rights of the Child.

1. Has a comprehensive stakeholder analysis been conducted, identifying the roles, influence, and perspectives of all actors, including those who may support or resist the safeguarding framework?

2. Has a strategy been developed to engage and strengthen the role of stakeholders who actively support child safeguarding, including mechanisms to coordinate and amplify their efforts?

3. Has a strategy been put in place to respectfully engage with stakeholders who may raise objections, aiming to foster dialogue, address misconceptions and build understanding around the non-negotiable nature of children's rights to protection from harm?

GOVERNANCE AT MUNICIPAL LEVEL

Within the framework of the Safe in Town project, there is a clear need to introduce the International Child Safeguarding Standards to the interconnected system of a municipality, which involves multiple levels of governance, disciplines, and actors. In this sense, child safeguarding must be embedded across all services and sectors, supporting a whole-system approach to upholding children's rights.

It is important to recognise that a municipality represents only one level of local governance and typically manages only part of the services and activities that impact children and relate to their protection. Other responsibilities may fall under regional or national authorities. This is particularly relevant in the context of the Safe in Town project, which involves four different European municipalities, each with its own governance structures and varying degrees of overlap between actors and levels of responsibility.

Recognising the municipality's dual role, both as a direct service provider and as an auxiliary or supportive actor, is essential. Even in areas where the municipality does not have full control, it can still influence outcomes and collaborate with other actors to promote and protect children's rights.

Developing and implementing child safeguarding measures at this level requires certain level of consistent coordination. Meaningful coordination across sectors at different levels means that:

- There is a lead body with responsibility for the coordination of child safeguarding across all municipal actors.
- This body has the capacity to deliver this.
- All municipal actors, departments and agencies understand their roles and responsibilities.
- There are formal agreements/protocols between them.
- Safe in Town Project partners provide technical and other support on the strengthening of the system.
- NGOs, professional associations and others are involved in a broad-based, coordinated approach to preventing and responding to child safeguarding concerns.
- There is a joint working across the planning, management, provision and delivery of services related to child protection.
- There are local interagency bodies to develop and agree on mutual child safeguarding policies and procedures at Municipal and lower levels which impact on children.

Coordination is ensured through the combined efforts of the Working Groups (WGs) established in each participating municipality and the national project partners in each country.

A **Working Group (WG)** is established in each of the four participating European municipalities — Ferrara, Chania, Strovolos, and Matosinhos — to lead the process at local level. Each WG is composed of **10 to 15 key representatives** of local institutions and services working with and for

children, including professionals from health and social services, the judiciary, law enforcement, and local authorities.

The WGs are **mandated to coordinate the development, implementation, and monitoring** of municipal child safeguarding policies and their related implementation plans, ensuring alignment with the overall project goals and child rights principles. Their work is carried out **in close coordination with the national project partners**, who provide technical support and ensure consistency across contexts.

Key responsibilities of the Working Groups include:

Adapting the child safeguarding framework to the local context;

- Using the framework and the findings of the **municipal mapping reports** to develop **coordinated and integrated child safeguarding procedures**;
- Designing and implementing a **coordinated, multidisciplinary, and multi-sectoral child safeguarding policy** at the municipal level;
- Holding regular coordination meetings (e.g., **monthly**) to review progress and document discussions and decisions; Overseeing the **integration of child safeguarding across all relevant municipal services**;
- **Leading municipal case review panels** for complex child protection cases to ensure rights-based, child-centred responses.

Additionally, a Child Advisory Board (CAB) is set up in each town, composed of 5 to 10 children from 13 to 18 years to be consulted regarding the adaptation of this framework to local contexts and the development of child safeguarding policies and procedures at municipal level.

Proposed Roles and Responsibilities of Key Actors

Please refer to the table on the next page.

SECTOR	ROLES AND RESPONSIBILITIES
Local Government	�× Convene and support WG �× Initiate the development implementation of child safeguarding policies and procedures �× Enforce municipal child protection ordinances
Child Protection Services / Social Welfare	�× Conduct assessments and case planning �× Provide case management and psychosocial support �× Refer to other services as needed �× Monitor family and placement arrangements
Police and Justice	�× Investigate abuse and violence cases �× Apply child-friendly legal procedures �× Collaborate with social services for child protection �× Enforce court decisions and protection orders
Health Services	�× Identify and treat signs of abuse �× Collect evidence �× Referrals of suspected abuse cases �× Provide trauma and mental health support for victims and survivors
Education	�× Integrate safeguarding in school policies �× Train staff to identify abuse �× Report on child safeguarding concerns �× Designate child protection focal points �× Promote safe and inclusive environments
Civil Society Service Providers and NGOs	�× Provide specialized services (legal, psychosocial) �× Raise awareness �× Monitor and report safeguarding status of the system �× Act as independent accountability actors
Faith-Based Actors	�× Promote child protection within faith contexts �× Provide community support �× Counter harmful traditional practices �× Support referrals and awareness efforts
Community Leaders	�× Mobilize local communities �× Mediate low risk cases if needed �× Report on child safeguarding concerns �× Lead change in harmful cultural norms

Proposed Mechanisms for Inter-Agency Collaboration

Given the complexity of the child safeguarding work and the diversity of the roles and responsibilities of the stakeholders involved, it is crucial to develop effective coordination mechanisms with a multisectoral approach. Those could be but not limited to:

- Action plan with roles, responsibilities and deadlines
- Formal protocols and agreements that define how the agencies will work together and share information
- Mutual Risk Assessment and Risk Register that would inform the development of a Child Safeguarding Policy at municipal level.
- A developed model for mutual rapid reaction from all stakeholders with clear terms, conditions, responsibilities and actions, as well as well-defined pathways for referral of child safeguarding concerns to relevant authorities.
- An appropriate reporting and responding mechanism at municipal level that reflects the model mentioned above.
- Shared plan and responsibilities for developing a child safeguarding policy and implementation plans at the municipal level.
- Intersectoral Standing Operational Procedures that guide timely and effective response to child abuse.
- Intersectoral Training on the above for all responsible parties
- Joint Monitoring and Evaluation Frameworks that derive from the action and policy implementation plans

3.
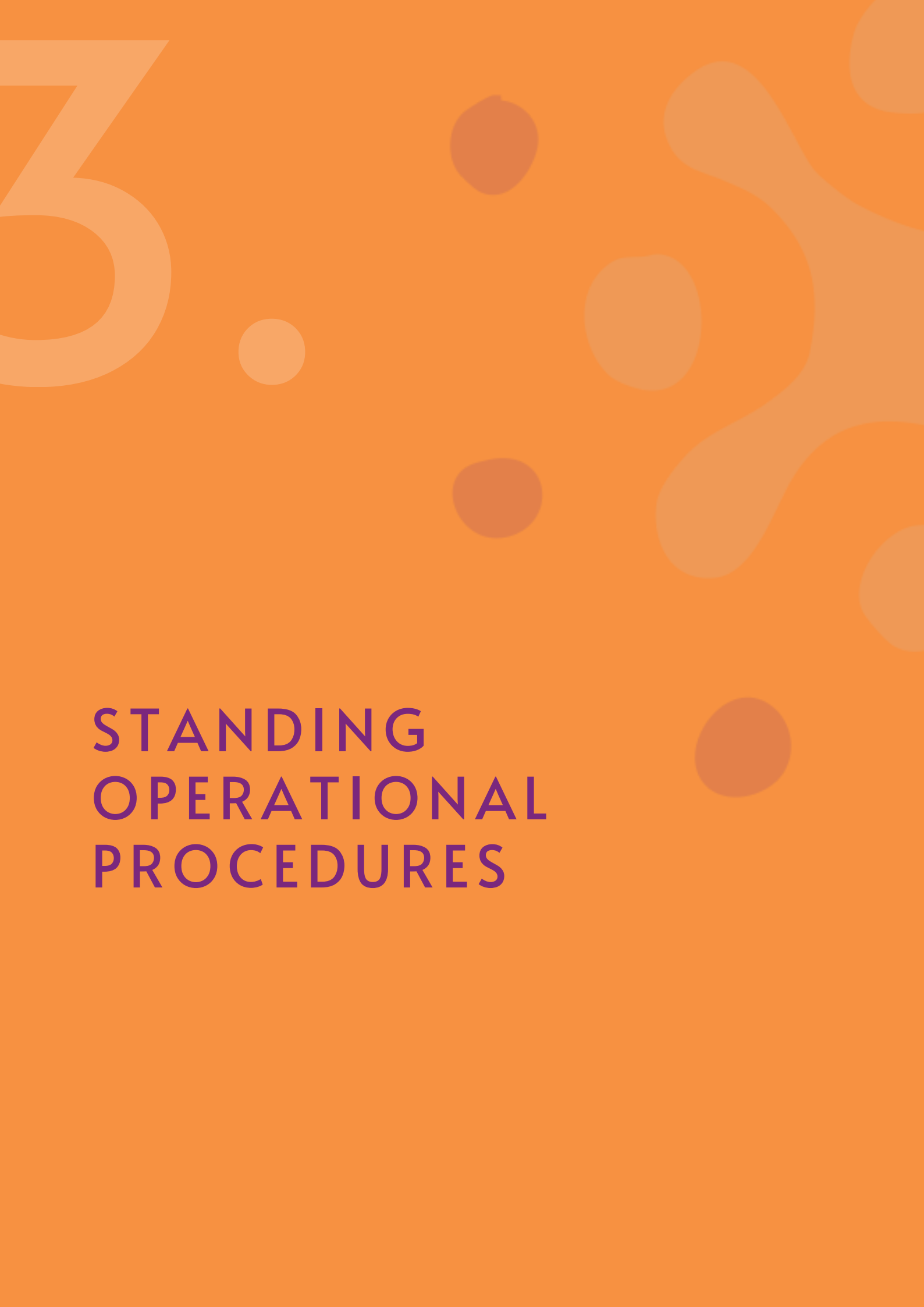
STANDING OPERATIONAL PROCEDURES

1. Risk Assessment

A risk assessment is an exercise that examines all aspects of services from a safeguarding perspective, to establish whether there are any practices or features of the service that have the potential to put children at risk. Risk assessments need to be regular and must reflect all operations and activities, etc.

At municipality level risk assessments should be carried by the WG and should record various pieces of information relating the risks potentially arising from all relevant actors including for example any potential consequences of these occurrences. They need to provide a platform for preventing or mitigating identified risks. They form part of a wider risk management process which allow municipality to track and monitor how the services might be negatively affecting those they are trying to help.

Ideally, all actors should also carry out risk assessments for their operational environments to inform better the risk assessment at the municipality level.

2. Safe recruitment

Safe Recruitment is a critical aspect of child safeguarding at municipal level. It needs to ensure that the individuals hired who have Access to children are properly selected, vetted and monitored. The WG should agree on mutual criteria for safe recruitment which should also be reflected in the final policy at municipal level.

Criteria include but is not limited to:

- Job descriptions that clearly state safeguarding responsibilities
- Background checks
- Written and signed off references from previous employers
- Safeguarding focused interview process
- Signed declaration that the code of conduct has been read and understood
- Probation period
- Induction and follow-up refresher training on child safeguarding

2. Induction and Training

All staff members at municipality level are expected to receive a training on child safeguarding, including annual refreshers. There should be reports of training and lists of attendance.

REPORTING AND RESPONDING MECHANISMS

All staff and associates at municipal level have the obligation to report on all concerns they have about a child. A prompt and appropriate response must be ensured. The WG should analyse the reporting mechanisms of all actors and use the data as common ground to develop a multisectoral and multidisciplinary model for rapid reporting and response. The following principles should be considered:

- Internal and external reporting should be ensured through establishing confidential, reporting channels suitable for all target groups.
- Proposed child-friendly channels should be discussed with CAB.
- Identifying information about children should be shared on a 'need to know' basis only.
- Reports should be treated seriously and with confidentiality.
- The priority should always be the safety and best interests of the child.
- Allegations against staff should result in immediate suspending from their employment.
- Those who raise concerns should be protected.
- Victims and survivors should be protected.
- Subject(s) of Complaint and witnesses should be protected.
- Investigations must be carried out only by trained professionals.
- The process of reporting should be described step-by-step and visualised through flowchart(s).
- The clearer the procedure, the more likely that it will be followed.

Early identification and response involve very practical measures that need to be taken, and all actors need to be aware of them. As part of the work, the definitions of harm (categories of abuse) present in this document need to be used to produce guidelines (including child-friendly) raising awareness on the indicators and early signs of abuse.

Key actors should:

- Recognise acts and early signs of abuse
- Understand age-appropriate developmental milestones and identify unusual treats and behaviours
- Use shared early signs/indicators of abuse guidelines

MONITORING AND REVIEW

To ensure that the International Child Safeguarding Standards are implemented at municipal level, there should be a constant monitoring from the WG and the project partners as well as periodic reviews.

Monitoring activities include but are not limited to:

- ✖ Review of major child safeguarding incidents.
- ✖ Review of case records, referrals and overall reporting and responding.
- ✖ Review the time before first signs and action, as well as the outcome of early interventions.
- ✖ Review of code of conduct development and staff adherence.
- ✖ Visits to daycare centres, schools, shelters, and other child-focused services to track progress of safeguarding implementation.

M&E framework is to be developed with indicators of success and means of verification. This should be completed by the WG with the support of all other potential stakeholders, including CAB and broader communities.

4.

RESOURCES

SAMPLE MODEL/CHILD SAFEGUARDING POLICY TEMPLATE

(This sample policy should only be used as a guide.)

1. Introduction

Introduce your activities and explain what you do. You can adapt your mission statement and insert it here. Then write a brief introduction to the policy, why it has been developed and how it will benefit the organisation and the children the organisation works with.

We believe that all forms of abuse and exploitation suffered by children are unacceptable. We accept that steps must be taken to protect children we come into contact with through our work. The possibility of staff, partners and associates abusing children is one which we take seriously and are committed to working to prevent.

This child safeguarding policy at the municipal level aims to be powerful tool that demonstrates political commitment to the protection, well-being, and rights of all children, especially those in vulnerable situations. By establishing clear procedures and responsibilities across sectors and services, the policy ensures that child safeguarding is a structured, coordinated, and accountable priority within local governance. It translates national and international obligations into practical, actionable measures, strengthening prevention, early identification, and timely response to all forms of violence, abuse, and neglect.

A multidisciplinary and multi-sectoral working group shall be established to support the development, implementation, and monitoring of this child safeguarding policy.

Efforts must be made to ensure gender balance within the composition of the working group to support inclusive and equitable decision-making processes. This includes, but is not limited to health professionals, social service providers, judiciary representatives, law enforcement officials and local government authorities

Child safeguarding is a corporate and an individual responsibility. All staff will be made familiar with the need for child safeguarding concern in all that we do. Associations with anyone found to be engaging in abusive and exploitative relationships with children will be broken.

- Principles (See 'Core Principles and Scope', p.2)
- Definitions and Terms (See 'Glossary of Terms/Definitions of Harm, p.4)
1. Prevention
   i) Risk Assessment and Risk management

State on how you will assess risk to children from all organisational functions and develop strategies to minimise those risks.

A risk assessment of all operations, programmes and project activities will be conducted. Risk mitigation strategies will be developed, which minimise the risk to children, and incorporated into the design, delivery and evaluation of programmes, operations and activities which involve or impact upon children.

   ii) Safe Recruitment

- Staff, consultants and volunteers will be recruited to clear job or role descriptions that include a statement on the position or role's responsibilities to meet the requirements of this child safeguarding policy.
- All prospective employees, volunteers, partners and associates will be informed of this child safeguarding policy. They will be asked to sign a declaration of criminal convictions as part of the application process.
- All applicants will be subject to police checks.
- For all applicants a reliable character reference will be obtained, and particular attention will be given to any area of concern relating to child protection. During the interview process applicants will be asked about previous work with children.
- All staff, volunteers, partners and associates will receive training in the Child Safeguarding Policy. They will be given a copy of the policy and will be required to sign a declaration that they have received and understood it.
- Individuals who are hired as independent contractors will be given a copy of the Policy and required to sign a declaration that they have received and understood it.
- Volunteers will be monitored by those to whom they are assigned to ensure that confidential information concerning children is not misused.

iii) Code of Conduct

A code of conduct is a clear and concise guide of what is and is not acceptable behaviour or practice when employed or engaged by the organisation. It should include acceptable and unacceptable behaviour with regards to children. All staff and associates including volunteers should agree to the code of conduct when they are employed and/or start their job. It should also be made clear what action the organisation will take if the code is broken or not followed correctly.

These are rules, which are designed to protect children but are also intended to protect adults from false accusations of inappropriate behaviour or abuse.

Staff need to follow that code within and outside the workplace. This means adopting appropriate behaviour themselves and reporting on concerns they have about a child whether in work or outside.

iv) Education and Training

State on how staff and associates, children and families will be receiving information, education and training on child safeguarding.

It is essential that all those employed or engaged have access to regular training on child safeguarding that is appropriate for their role and responsibilities, beginning at the induction/orientation stage and to understand the reporting mechanism.

Information on child safeguarding should be available in the appropriate format and language to be accessible by all staff, children and carers.

v) Safe Programme Design

State your commitment to design and deliver programmes which are safe for children. Include in this section that programmes and projects will be risk assessed for safety and safety strategies developed.

vi) Communication

State your commitment to undertake all communications in a safe manner, including reference to a communications policy if appropriate. Principles and guidelines for communications

In our use of information and visual images, both photographic stills and video, our overriding principle is to maintain respect and dignity in our portrayal of children, families and communities. Our communications policy/guidelines detail our procedures.

vii) Roles and Responsibilities
- Establishment of a municipal child safeguarding committee or task force with representation from all relevant sectors: education, health, social services, police, justice, NGOs, youth services, and community leaders.
- Defined roles and responsibilities of each stakeholder/sector.
- Protocols for interagency collaboration and information sharing (with data protection safeguards).
- Memoranda of Understanding (MoUs) or cooperation agreements between agencies.
- Statement that the policy has been approved by the leadership and how management will ensure the policy is being implemented.

2. Partners

Agreements with partners will include a statement that partners who do not have a child safeguarding policy will abide by this policy and develop their own as a condition of the partnership.

3. Reporting and Responding to Concerns

State that any report will be treated seriously and with confidentiality. The priority will always be the safety and best interests of the child.

A Child Safeguarding Officer (CSO) or Child Safeguarding Focal Point must be appointed. This person is responsible for receiving and managing all reports of safeguarding concerns. Their role and contact details should be clearly communicated to all staff, associates, and children in age-appropriate and gender-sensitive formats.]

State your obligation that all staff and associates need to report on all concerns they have about a child. Include the reporting flowchart with clearly designated staff to receive. It is also recommended to have child-friendly versions of such document to inform children how to report that are accessible to children of different ages, genders, and abilities.

Reporting and responding mechanisms must be safe, confidential, inclusive, and effective, while also being aligned with international child safeguarding standards and the principles of gender equality and child participation

4. Monitoring and Review

State on how the policy and procedures will be monitored and reviewed. Regular monitoring of risks, risk mitigation and the effectiveness of the child safeguarding measures needs to be incorporated into all normal monitoring processes and activities. The policy should be reviewed at least every 3 years.

Child safeguarding is incorporated into the organisation's risk register and annual reporting processes. Senior management and the Board of Trustees will regularly review the risk register and organisation reports to ensure that child safeguarding measures are in place and effective.

This policy will be reviewed at minimum of every 3 years or when it is shown necessary that additional issues need to be identified and addressed.

SAFE IN TOWN

STRENGTHENING INTEGRATED CHILD PROTECTION IN SELECTED EUROPEAN MUNICIPALITIES THROUGH THE DEVELOPMENT AND ACTIVATION OF COMPREHENSIVE CITY CHILD SAFEGUARDING POLICIES

DEFENCE FOR CHILDREN INTERNATIONAL – ITALY
DEFENCE FOR CHILDREN INTERNATIONAL – GREECE
CESIS – PORTUGAL
HOPE FOR CHILDREN – CYPRUS