

Safeguarding and Child Protection Policy

Culture Goes Europe (CGE) e.V.

Document V3

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Safeguarding and Child Protection Policy

1. Purpose and values

Culture Goes Europe e.V. (CGE) is committed to providing a safe, respectful, and inclusive environment for everyone involved in its work. This includes children, young people, adult participants, staff members, trainers, facilitators, volunteers, interns, board members, consultants, and representatives of partner organisations.

CGE recognises that its activities — including youth exchanges, trainings, workshops, cultural programmes, local events, international mobilities, online activities, and other forms of non-formal education — create relationships of trust and responsibility. These settings can also involve power imbalances, vulnerability, close interpersonal contact, travel, shared accommodation, and digital communication. CGE therefore takes active steps to prevent harm, respond appropriately to concerns, and promote a culture of dignity, accountability, and care.

The purpose of this Policy is to:

- protect all persons involved in CGE activities from harm, abuse, neglect, exploitation, harassment, and other forms of inappropriate conduct;
- set clear safeguarding principles, standards of behaviour, and responsibilities for all persons acting on behalf of or within the framework of CGE;
- establish accessible procedures for recognising, reporting, recording, and responding to safeguarding concerns;
- ensure that safeguarding is integrated into the planning, implementation, monitoring, and review of CGE activities and partnerships;
- promote a rights-based, survivor-centred, and child-centred approach in all safeguarding action.

CGE has zero tolerance for abuse, exploitation, harassment, or neglect committed by anyone working for, representing, or participating in its activities where they hold responsibility, trust, or influence over others. All safeguarding concerns will be taken seriously and handled with care, confidentiality, fairness, and due regard for the safety and well-being of those involved.

This Policy is guided by the following values:

Dignity and respect: Every person has the right to be treated with dignity, respect, and consideration, regardless of age, gender, sexual orientation, disability, ethnicity, religion, nationality, migration background, socio-economic status, or any other personal characteristic.

Do no harm: CGE seeks to ensure that its activities, structures, communications, and relationships do not expose participants or others to avoidable harm, risk, exclusion, or abuse.

Best interests of the child: In all matters involving persons under the age of 18, the best interests of the child shall be a primary consideration.

Inclusion and non-discrimination: CGE is committed to creating safer spaces that are inclusive, equitable, and attentive to discrimination, unequal power relations, and the specific vulnerabilities that some individuals or groups may face.

Participation and accountability: Participants, staff, volunteers, and partners should know what behaviour they can expect, what standards apply, and how to raise concerns. CGE is committed to clear accountability mechanisms and to taking concerns seriously.

Prevention: Safeguarding is not limited to reacting to incidents. CGE commits to prevention through safer recruitment, codes of conduct, training, risk assessment, partnership due diligence, and activity design.

Confidentiality and data protection: Safeguarding-related information must be handled sensitively, shared only on a need-to-know basis, and processed in line with applicable data protection law, including the General Data Protection Regulation (GDPR).

Victim-centred and child-centred response: Any safeguarding response must prioritise safety, well-being, dignity, and rights. CGE will seek to respond in ways that avoid further harm, respect confidentiality, and support appropriate follow-up.

Shared responsibility: Safeguarding is a collective responsibility. Everyone covered by this Policy has a duty to contribute to a safe environment, uphold appropriate boundaries, and report concerns or breaches in good faith.

This Policy forms the general safeguarding framework of CGE. It is complemented by a Child Protection Annex (Annex 1), which sets out additional rules, responsibilities, and procedures specifically applicable where children and minors are involved in CGE activities.

2. Scope and who the policy applies to

This Policy applies to all safeguarding matters arising in connection with the work of Culture Goes Europe e.V. (CGE). It covers conduct that takes place during, in preparation for, or in relation to CGE activities, whether these are organised in Germany or abroad, and whether they take place in person, online, or in hybrid form.

The Policy applies to all persons acting on behalf of, representing, working for, volunteering with, or participating in CGE activities, where their role involves responsibility, trust, authority, access, or influence in relation to others.

This includes, in particular:

- staff members and management;
- board members and other governing or advisory bodies;
- trainers, facilitators, speakers, moderators, mentors, and group leaders;
- interns, volunteers, and youth workers;
- consultants, contractors, and external service providers engaged by CGE;
- partner organisations and, where relevant, their staff, facilitators, volunteers, or representatives involved in a CGE activity or project;
- host organisations, venue staff, accommodation providers, transport providers, and other third parties, where safeguarding obligations are relevant to the activity;

- adult participants in CGE programmes and events;
- children and young people participating in CGE activities, including in the framework set out in the Child Protection Annex (Annex 1);
- visitors, guests, observers, media representatives, and donors attending or accessing CGE activities, where applicable.

This Policy applies across the full range of CGE work, including but not limited to:

- youth exchanges;
- training courses and workshops;
- cultural, educational, and community-based activities;
- local and international events;
- meetings, conferences, study visits, and project mobilities;
- online sessions, digital communication, and social media interaction connected to CGE activities;
- planning, preparation, travel, accommodation, implementation, and follow-up related to such activities.

The Policy applies to safeguarding risks and concerns that arise:

- during a CGE activity or project;
- in accommodation, transport, or informal spaces linked to a CGE activity;
- through one-to-one or group communication connected to CGE;
- in digital environments used for CGE work;
- outside formal activity hours where there is a clear link to the role, responsibilities, or relationships created through CGE.

This Policy is not limited to conduct occurring on CGE premises or during formal programme hours. It also applies where behaviour outside those settings has a sufficient connection to CGE activities, roles, or relationships and may affect the safety, dignity, or well-being of participants or others involved.

The Policy covers, in particular, concerns relating to:

- abuse, neglect, exploitation, or violence;
- sexual harassment or sexual misconduct;
- grooming or inappropriate relationships;
- bullying, intimidation, humiliation, or degrading treatment;
- discriminatory, exclusionary, or hate-based behaviour;
- abuse of power, trust, or authority;
- unsafe or inappropriate conduct in relation to minors;
- breaches of professional or role boundaries;
- unsafe handling of safeguarding-related personal data or images.

Where children are involved, the present Policy must be read together with the Child Protection Annex (Annex 1), which provides additional standards and procedures specific to persons under the age of 18.

All persons covered by this Policy are expected to:

- behave in line with its principles and rules;

- contribute to a safe and respectful environment;
- cooperate with safeguarding measures relevant to their role;
- report concerns, suspicions, or breaches in good faith and without undue delay.

CGE also expects partner organisations and third parties involved in its activities to meet equivalent safeguarding standards. Where appropriate, this will be addressed through agreements, codes of conduct, partner checklists, or specific safeguarding arrangements for the activity concerned.

Nothing in this Policy replaces obligations arising under applicable law, including German child and youth protection law, labour law, data protection law, criminal law, or any additional legal requirements applicable in the country where an activity takes place.

3. Definitions

For the purposes of this Policy, the following definitions apply:

Safeguarding: Safeguarding refers to the measures, responsibilities, and practices put in place to prevent harm, abuse, neglect, exploitation, harassment, and other forms of inappropriate conduct in connection with CGE's work, and to ensure that concerns are recognised, reported, and responded to appropriately. In the context of CGE, safeguarding applies to children, young people, and adults involved in CGE activities.

Child: A child is any person under the age of 18.

Young person / youth participant: A young person or youth participant is a person taking part in a CGE activity who falls within the youth target group of the specific project or programme. Depending on the activity, youth participants may be minors or adults. Where a participant is under 18, the Child Protection Annex (Annex 1) applies in addition to this Policy.

Adult at risk: An adult at risk is a person aged 18 or over who may be more vulnerable to harm, abuse, exploitation, coercion, or neglect due to personal, social, situational, or structural factors. This may include, for example, disability, mental or physical health condition, trauma, dependency, discrimination, language barriers, insecure status, social isolation, or unequal power relations in a given context.

Safeguarding concern: A safeguarding concern is any worry, suspicion, allegation, disclosure, observation, or indication that a person may have experienced, is experiencing, or may be at risk of harm, abuse, exploitation, neglect, harassment, or other inappropriate conduct in connection with CGE activities or relationships linked to CGE.

Safeguarding incident: A safeguarding incident is a reported or suspected event involving actual or potential harm, abuse, exploitation, neglect, harassment, or a breach of safeguarding standards or boundaries by a person covered by this Policy, or occurring within the context of a CGE activity.

Child protection: Child protection refers to the specific measures taken to prevent and respond to violence, abuse, neglect, exploitation, and other harm affecting children. Within CGE, child protection is addressed through this Policy and the Child Protection Annex (Annex 1).

Abuse: Abuse means any action or failure to act that causes, or is likely to cause, harm to another person. Abuse may be physical, emotional, psychological, sexual, verbal, or institutional, and may also include coercion, manipulation, threats, or misuse of trust.

Neglect: Neglect means the persistent or serious failure to meet a person's basic needs for safety, care, supervision, support, dignity, or protection, where there is a responsibility to do so.

Exploitation: Exploitation means the abuse of a position of trust, vulnerability, dependency, or unequal power for personal, financial, social, political, sexual, or other advantage.

Sexual exploitation: Sexual exploitation means any actual or attempted abuse of a position of vulnerability, unequal power, or trust for sexual purposes. It may include pressure, manipulation, coercion, or exchange-based behaviour, even where no physical force is used.

Sexual abuse: Sexual abuse means any actual or threatened sexual act imposed on a person without their free, informed, enthusiastic and voluntary consent, or where the person is unable to give valid consent. In relation to children, any sexual activity with a child constitutes sexual abuse.

Sexual harassment: Sexual harassment means any unwanted conduct of a sexual nature that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment. This may be verbal, non-verbal, physical, or digital.

Harassment: Harassment means unwanted conduct related to a personal characteristic or position that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment.

Discrimination: Discrimination means unequal, unfair, or harmful treatment based on characteristics such as age, gender, gender identity, sexual orientation, disability, ethnicity, nationality, religion or belief, migration background, socio-economic status, or other protected or relevant characteristics.

Bullying: Bullying means repeated or serious behaviour intended to intimidate, humiliate, isolate, dominate, or harm another person. Bullying may occur in person or online.

Grooming: Grooming refers to behaviour intended to build trust or emotional connection with a child or other vulnerable person in order to manipulate, exploit, abuse, or harm them, including through online communication.

Boundary violation: A boundary violation is behaviour that crosses professional, organisational, relational, or role-based limits in a way that is inappropriate, unsafe, exploitative, or likely to cause harm. This may include excessive personal closeness, one-to-one isolation, inappropriate communication, favouritism, or misuse of authority.

Consent: Consent means a freely given, reversible, informed, enthusiastic, and specific agreement to something. Consent cannot be assumed, cannot be obtained through pressure or imbalance of power, and can be withdrawn at any time. For safeguarding purposes, a child cannot consent to abuse or exploitation. In contexts involving minors,

parental or guardian consent may also be required for participation, travel, accommodation, images, or other specific matters.

Disclosure: A disclosure is when a person shares information indicating that they have experienced, witnessed, or are at risk of harm, abuse, neglect, exploitation, or other inappropriate conduct.

Victim: A victim is a person who has experienced harm, abuse, exploitation, harassment, or violence. CGE uses this term in a respectful and person-centred way, while recognising that some individuals may prefer different language, including "survivor".

Safeguarding Lead: The Safeguarding Lead is the person designated by CGE to receive safeguarding concerns, support appropriate response, ensure documentation and follow-up, advise staff and volunteers, and coordinate safeguarding implementation within the organisation.

Deputy Safeguarding Contact: The Deputy Safeguarding Contact is the person designated to act where the Safeguarding Lead is unavailable, where urgent action is needed, or where a concern involves the Safeguarding Lead directly.

Covered persons: Covered persons are all individuals to whom this Policy applies, including staff, board members, interns, volunteers, trainers, facilitators, consultants, contractors, partner representatives, and other persons acting on behalf of or in connection with CGE activities.

Participant: A participant is any person taking part in a CGE activity, programme, training, exchange, workshop, event, meeting, mobility, or online activity, whether as a learner, attendee, contributor, or beneficiary.

Partner organization: A partner organisation is any external organisation working with CGE in the planning, funding, hosting, delivery, or follow-up of an activity or project.

Third party: A third party is any external individual or entity involved in or connected to a CGE activity who is not part of CGE staff or governance structures. This may include service providers, consultants, venue staff, interpreters, transport providers, accommodation providers, photographers, or invited guests.

Personal data: Personal data means any information relating to an identified or identifiable person. In safeguarding contexts, this may include names, contact details, incident reports, health-related information, images, statements, travel data, or other identifying details.

Need-to-know basis: Need-to-know basis means that safeguarding-related information is shared only with those who genuinely require it in order to protect a person, manage a case, fulfil a legal duty, or carry out their safeguarding responsibilities.

Online / digital safeguarding: Online or digital safeguarding refers to the prevention of harm and the promotion of safety in digital environments connected to CGE activities, including messaging platforms, emails, social media, video calls, online learning spaces, and shared digital content.

Code of conduct: A code of conduct is a set of behavioural rules and expectations that all covered persons must follow in the context of CGE activities.

Child Protection Annex: The Child Protection Annex (Annex 1) is the part of CGE's safeguarding framework that contains additional rules, procedures, and protective measures specifically applicable where children, meaning persons under 18, are involved.

4. Legal and Policy Framework

This Policy is grounded in the legal, ethical, and organisational frameworks that guide the work of Culture Goes Europe e.V. (CGE) and its responsibility to provide a safe, respectful, and accountable environment in all of its activities.

CGE recognises that safeguarding is not only an internal organisational commitment, but also a matter connected to the rights, dignity, safety, and protection of children, young people, and adults involved in its work. This Policy is therefore interpreted and implemented in line with applicable European Union law, German law, and relevant internal rules and procedures. In the case of international activities, CGE will also take into account the legal requirements of the host country, while maintaining the standards set out in this Policy.

4.1 European and German legal framework

CGE implements this Policy in accordance with the General Data Protection Regulation (GDPR) — Regulation (EU) 2016/679¹, which establishes the legal framework for the lawful, fair, transparent, and secure processing of personal data in the European Union. This is particularly relevant to safeguarding records, incident reports, consent documentation, photographs and media content, health-related information, and any other personal data processed in the context of prevention, reporting, or response.

Safeguarding-related data shall be processed only for legitimate purposes, on a need-to-know basis, and in accordance with the principles of data minimisation, confidentiality, storage limitation, and accountability.

In relation to children and young people, CGE also takes guidance from the German Social Code Book VIII (Sozialgesetzbuch VIII – Kinder- und Jugendhilfe)², which forms the central legal framework for child and youth welfare in Germany. In particular, CGE recognises the importance of:

- § 8a SGB VIII, which sets out the child protection mandate where there are significant indications of a risk to a child's welfare; and
- § 72a SGB VIII, which addresses the exclusion of persons with relevant prior convictions from roles involving supervision, care, education, training, or comparable contact with minors, and provides the basis for using criminal background checks in child-related settings.

Where relevant, CGE will also observe applicable provisions of German civil, criminal, labour, anti-discrimination, and data protection law, as well as any reporting or protective duties that may arise in specific cases.

¹ [Regulation \(EU\) 2016/679 of the European Parliament and of the Council](#) of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)

² [Sozialgesetzbuch \(SGB\) - Aches Buch \(VIII\) - Kinder- und Jugendhilfe](#) - (Artikel 1 des Gesetzes v. 26. Juni 1990, BGBl. I S. 1163)

4.2 Equality, inclusion, and non-discrimination

This Policy is also informed by the values reflected in the EU Gender Equality Strategy 2026–2030³, which promotes equality, freedom from gender-based violence, the integration of gender equality across policy and institutional practice, and puts forward concrete actions to embed gender equality into every aspect of life, both online and offline, from education and health to work and leadership. For CGE, this supports a safeguarding approach that is attentive to unequal power relations, discrimination, exclusion, and the different ways in which risk may affect individuals depending on gender, age, disability, sexual orientation, migration background, ethnicity, religion, or other personal or social characteristics.

CGE understands safeguarding as closely linked to inclusion and non-discrimination. Safeguarding measures should therefore be designed and implemented in ways that are accessible, respectful, and responsive to the needs of different participants, including those who may face greater barriers to reporting concerns or accessing support.

4.3 Internal organisational framework

This Policy forms part of CGE’s broader internal commitment to ethical, safe, and rights-based practice in youth work, cultural work, education, mobility, and participation. It should be read together with other relevant CGE internal rules, procedures, and documents, including where applicable:

- codes of conduct;
- recruitment and volunteer procedures;
- data protection and privacy procedures;
- complaints and reporting procedures;
- consent forms and media consent procedures;
- risk assessment and event planning documents;
- partnership agreements and safeguarding expectations for partners.

The Child Protection Annex (Annex 1) complements this Policy by setting out the additional rules, procedures, and protective standards that apply where children, meaning persons under the age of 18, are involved in CGE activities.

4.4 Minimum standard and applicable law

Where CGE activities take place internationally or in cooperation with external partners, CGE will comply with applicable local legal requirements in addition to this Policy. If local law sets a higher standard, that higher standard shall apply. If local law is less protective than the standards set out in this Policy, CGE will apply this Policy to the greatest extent legally and practically possible.

Nothing in this Policy limits or replaces any duty arising under applicable law. Rather, this Policy is intended to provide a clear internal safeguarding framework through which CGE can prevent harm, respond appropriately to concerns, and uphold its responsibilities in a consistent and accountable manner.

³ [EU Gender Equality Strategy 2026–2030](#)

5. Safeguarding Principles

The following principles guide the interpretation and implementation of this Policy and all safeguarding-related action within Culture Goes Europe e.V. (CGE):

5.1 Dignity and respect

Every person involved in CGE activities has the right to be treated with dignity, respect, and consideration. CGE is committed to fostering environments in which people feel safe, valued, and able to participate without fear of abuse, harassment, discrimination, humiliation, or neglect.

5.2 Do no harm

CGE shall take all reasonable steps to ensure that its activities, decisions, relationships, and communications do not expose children, young people, adult participants, staff, volunteers, or others to avoidable harm. Safeguarding requires active attention not only to responding to abuse, but also to identifying and reducing risks before harm occurs.

5.3 Prevention

Safeguarding is first and foremost preventive. CGE is committed to reducing risk through appropriate recruitment and screening, clear codes of conduct, training, safer activity design, partner due diligence, risk assessment, responsible communication, and clear reporting mechanisms.

5.4 Best interests of the child

Where children are involved, the best interests of the child shall be a primary consideration in all decisions and actions. The safety, well-being, dignity, and rights of the child must guide CGE's approach at all times.

5.5 Zero tolerance for abuse and exploitation

CGE has zero tolerance for abuse, exploitation, harassment, neglect, and other forms of safeguarding misconduct by persons covered by this Policy. All concerns will be taken seriously and addressed in a timely, fair, and appropriate manner.

5.6 Inclusion and non-discrimination

Safeguarding must be implemented in a way that is inclusive, equitable, and sensitive to different forms of vulnerability, exclusion, and unequal power. CGE recognises that people may experience risk differently depending on factors such as age, gender, disability, health, sexuality, migration background, socio-economic status, language, ethnicity, religion, or other personal and social circumstances. Safeguarding measures should therefore be accessible and responsive to diverse needs.

5.7 Participation and informed involvement

People involved in CGE activities should be informed, in an age-appropriate and accessible way, about expected standards of behaviour, available support, and how to raise concerns. Safeguarding is strengthened when participants, staff, volunteers, and partners understand their rights, responsibilities, and reporting options.

5.8 Victim-centred and child-centred approach

Any safeguarding response must prioritise the safety, dignity, well-being, and rights of the victim, while taking special care where a child is involved. CGE will seek to respond in ways that minimise the risk of further harm, respect the wishes and needs of the person affected where possible, and ensure that protective action is taken appropriately.

5.9 Confidentiality and privacy

Safeguarding concerns must be handled with sensitivity, discretion, and respect for privacy. Information shall be shared only on a need-to-know basis and in accordance with applicable legal and organisational obligations, including data protection requirements. Confidentiality must, however, never be used as a reason to avoid reporting or acting on a safeguarding concern.

5.10 Accountability

All persons covered by this Policy are responsible for upholding safeguarding standards within the scope of their role and conduct. CGE is committed to ensuring that concerns can be reported, that decisions are documented, and that appropriate action is taken when standards are breached.

5.11 Proportionality and fairness

Safeguarding action must be proportionate to the seriousness and nature of the concern, while always prioritising safety. CGE will handle concerns fairly, impartially, and without prejudgment, and will respect the rights and dignity of all persons involved throughout any response process.

5.12 No retaliation for reporting in good faith

No person shall suffer disadvantage, retaliation, intimidation, or adverse treatment for raising a safeguarding concern or reporting a suspected breach of this Policy in good faith. CGE encourages a culture in which concerns can be raised responsibly and without fear.

5.13 Shared responsibility

Safeguarding is a shared responsibility across the organisation. It is not the task of one designated person alone. Staff, board members, trainers, facilitators, volunteers, partners, and other covered persons all have a role in creating and maintaining safe environments, modelling appropriate behaviour, identifying risks, and reporting concerns.

6. Roles and Responsibilities

Safeguarding is a shared responsibility across Culture Goes Europe e.V. (CGE). While specific roles carry particular duties, all persons covered by this Policy are expected to contribute to a safe, respectful, and accountable environment.

6.1 Organisational responsibility

CGE is responsible for establishing, maintaining, and reviewing an effective safeguarding framework appropriate to its activities, size, and areas of work. This includes ensuring that safeguarding is integrated into organisational practice, event planning, partnerships, recruitment, communication, and decision-making.

CGE shall take reasonable steps to:

- adopt and periodically review this Policy and its related procedures;
- designate a Safeguarding Team (Annex 2);
- ensure that safeguarding concerns can be raised and handled appropriately;
- provide relevant training, guidance, and support;
- promote awareness of safeguarding standards and reporting options;
- implement proportionate preventive measures for activities involving minors and other safeguarding risks;
- maintain appropriate documentation, confidentiality, and data protection standards;
- take appropriate action in response to concerns, allegations, or breaches.

6.2 Board

The Board holds overall responsibility for ensuring that CGE has an appropriate safeguarding framework in place and that safeguarding is treated as an organisational priority.

The Board shall:

- approve and periodically review the safeguarding framework;
- support a culture of safety, accountability, and non-retaliation;
- ensure that sufficient responsibility and authority are given to safeguarding functions;
- receive information on serious safeguarding matters where appropriate and in line with confidentiality requirements;
- ensure that conflicts of interest are managed appropriately, including where concerns involve members of the Safeguarding Team (Annex 2) or other senior personnel.

The Board is not responsible for handling every safeguarding concern directly, but it must ensure that concerns are handled through appropriate procedures and oversight.

6.3 Safeguarding Team

CGE shall designate a Safeguarding Team (Annex 2) composed of two appointed persons who are responsible for coordinating the implementation of this Policy and supporting the organisation's safeguarding response.

The Safeguarding Team (Annex 2) serves as the main contact point for safeguarding concerns within the organisation. Concerns may be reported to either member of the team or through the designated safeguarding email address.

The Safeguarding Team (Annex 2) shall:

- receive safeguarding concerns, reports, and disclosures;
- support immediate risk assessment and protective action where needed;
- ensure that concerns are documented and handled confidentially;

- advise staff, volunteers, facilitators, and partners on safeguarding matters;
- coordinate appropriate follow-up, including with management, the Board, partners, external professionals, or authorities where necessary;
- support safeguarding risk assessment in activities and partnerships;
- contribute to training, awareness-raising, and policy review;
- help ensure that safeguarding records are stored and processed appropriately.

The Safeguarding Team (Annex 2) works collaboratively, while ensuring that reports are handled in a timely, impartial, and sensitive manner. Where a concern involves one member of the Safeguarding Team (Annex 2), the matter shall be handled by the other member and, where necessary, escalated to the Board.

6.4 Composition, background, and competences of the Safeguarding Team

CGE shall ensure that the members of the Safeguarding Team (Annex 2) are persons who are suitably qualified, trusted, and capable of handling safeguarding concerns with discretion, sensitivity, and sound judgment. The description of the Safeguarding Team (Annex 2) shall include the names, roles, and relevant backgrounds of its members, including their safeguarding-related competences, experience, and responsibilities within CGE.

These may include, for example:

- experience in youth work, education, facilitation, psychosocial support, or project coordination;
- knowledge of safeguarding, child protection, boundary-setting, and reporting obligations;
- familiarity with CGE's activities, structures, and participant groups;
- capacity to respond calmly, confidentially, and appropriately to disclosures or concerns;
- ability to coordinate follow-up and referral where necessary.

CGE presents the profiles of the two designated Safeguarding Team members in an annex (Annex 2) to this Policy.

6.5 Safeguarding contact email

CGE shall maintain a designated safeguarding email address (safeguarding@cge-erfurt.org) through which safeguarding concerns, complaints, or reports may be submitted. This email address shall be monitored by the Safeguarding Team (Annex 2) and communicated clearly to staff, volunteers, participants, and partners. The use of this email does not prevent concerns from also being raised in person or through other appropriate reporting channels. Reports submitted through the safeguarding email shall be handled confidentially and in accordance with this Policy and applicable data protection requirements.

6.6 Staff members

All staff members share responsibility for safeguarding within the scope of their role. Staff are expected to understand and comply with this Policy, maintain appropriate boundaries, identify risks, and act on concerns.

Staff members shall:

- behave in accordance with this Policy, the Code of Conduct, and any related procedures;
- help create safe, respectful, and inclusive environments;
- report safeguarding concerns, suspicions, disclosures, or breaches without undue delay;
- cooperate with safeguarding measures, documentation, and follow-up processes;
- contribute to safe planning and delivery of activities, including appropriate risk mitigation.

Staff members with management or coordination responsibilities must also ensure that safeguarding is actively considered in supervision, recruitment, event planning, partnerships, and team support.

6.6 Trainers, facilitators, group leaders, and youth workers

Persons responsible for leading, supervising, mentoring, or facilitating activities have an enhanced duty of care due to their direct role in participant safety and well-being.

They shall:

- model appropriate and respectful behaviour at all times;
- maintain clear professional and relational boundaries;
- help establish safe group dynamics and safer spaces;
- pay attention to signs of distress, exclusion, boundary violations, or inappropriate conduct;
- respond appropriately to immediate concerns and report them without delay;
- follow any specific safeguarding arrangements applicable to the activity, including those related to travel, accommodation, online communication, or minors.

6.7 Volunteers and interns

Volunteers and interns are expected to comply fully with this Policy within the scope of their role and level of responsibility. They must receive clear information on expected conduct, safeguarding risks relevant to their tasks, and reporting routes.

They shall:

- act in line with safeguarding standards and organisational guidance;
- respect boundaries and role limitations;
- report concerns, incidents, or breaches in good faith and without delay;
- seek guidance where unsure how to respond to a situation.

6.8 Participants

Participants in CGE activities are expected to contribute to a safe and respectful environment and to treat others with dignity and consideration. They must comply with any participant code of conduct, safer space rules, or safeguarding instructions relevant to the activity.

Participants should be informed, in an accessible way, about:

- expected standards of behaviour;
- available support and reporting options;

- any activity-specific safeguarding rules, including those related to accommodation, travel, digital communication, consent, and group conduct.

Where participants raise a safeguarding concern, CGE shall take that concern seriously and respond in accordance with this Policy.

6.9 Partner organisations

Partner organisations involved in CGE projects or activities are expected to uphold safeguarding standards compatible with this Policy and appropriate to their role in the activity.

Depending on the nature of the partnership, CGE may require partners to:

- confirm that they have their own safeguarding policy or agree to follow CGE safeguarding standards for the activity;
- designate a contact person for safeguarding matters;
- ensure that their staff, facilitators, and volunteers understand relevant safeguarding obligations;
- cooperate in risk assessment, prevention, reporting, and response;
- ensure that legal and practical safeguarding requirements, including those related to minors, travel, accommodation, supervision, and background checks where relevant, are met.

6.10 Contractors, service providers, and third parties

Regarding external persons or entities involved in CGE activities, where relevant, CGE shall ensure that such persons are informed of applicable safeguarding expectations and that these are addressed through contracts, briefing, codes of conduct, or activity arrangements.

6.11 Visitors, guests, and observers

Visitors, guests, media representatives, and observers attending CGE activities must respect the safeguarding standards applicable to the setting. Where their presence involves contact with participants, especially minors, CGE may require prior briefing, supervision, restrictions, consent arrangements, or other protective measures.

6.12 Duty to report

All persons covered by this Policy who become aware of a safeguarding concern, receive a disclosure, observe warning signs, or suspect that a breach may have occurred must act responsibly and report the matter through the appropriate channel without undue delay.

No person is expected to investigate a concern on their own unless specifically authorised to do so. Their responsibility is to recognise, respond appropriately in the moment, record basic relevant information where required, and report.

6.13 Failure to meet safeguarding responsibilities

Failure to comply with safeguarding responsibilities under this Policy may result in appropriate action, depending on the role of the person concerned and the seriousness of the matter. This may include guidance, restriction from activities, removal of

responsibilities, termination of engagement, suspension of partnership arrangements, referral to relevant authorities, or other appropriate measures.

7. Code of Conduct / Expected and Prohibited Behaviour

All persons covered by this Policy are expected to contribute to a safe, respectful, and inclusive environment in all activities connected to CGE. This section sets out the standards of conduct that apply to staff, board members, trainers, facilitators, volunteers, interns, consultants, partners, and other persons acting on behalf of or within the framework of CGE activities. The following rules apply in person, during travel and accommodation, in informal moments connected to an activity, and in digital or online spaces used in connection with CGE work.

7.1 General standard of conduct

All covered persons shall:

- treat others with dignity, respect, and consideration;
- act in a way that promotes safety, inclusion, and well-being;
- maintain appropriate professional, organisational, and interpersonal boundaries;
- avoid behaviour that may be abusive, exploitative, intimidating, discriminatory, humiliating, or otherwise harmful;
- be mindful of power imbalances, especially in relation to children, young people, participants, and persons in more vulnerable situations;
- behave responsibly in ways that uphold the integrity, trust, and values of CGE;
- follow this Policy, the Child Protection Annex (Annex 1) where applicable, and any related safeguarding rules, codes of conduct, or activity-specific instructions.

7.2 Expected behavior

Persons covered by this Policy are expected to:

a. Promote safe and respectful environments

- help create an atmosphere in which participants feel respected, included, and able to raise concerns;
- contribute to safer spaces free from harassment, bullying, discrimination, and abuse;
- communicate clearly, respectfully, and appropriately in all settings.

b. Maintain appropriate boundaries

- keep relationships with participants, especially minors, within appropriate professional and activity-related boundaries;
- avoid favouritism, dependency, manipulation, or excessive personal closeness;
- ensure that contact, communication, and support are appropriate to the role, context, age, and level of responsibility involved.

c. Act responsibly in positions of trust

- use any role, responsibility, or authority in a fair and accountable way;
- avoid situations that may create unnecessary risk, misunderstanding, or harm;

- seek support or guidance where boundaries or responsibilities are unclear.

d. Respond appropriately to concerns

- listen seriously and respectfully if someone raises a concern or makes a disclosure;
- act promptly on safeguarding concerns in accordance with reporting procedures;
- cooperate with safeguarding measures, documentation, and follow-up where required.

e. Respect privacy and confidentiality

- handle personal and safeguarding-related information sensitively and only on a need-to-know basis;
- respect data protection and confidentiality requirements, including in relation to reports, participant information, and images;
- avoid sharing identifying or sensitive information casually, publicly, or through insecure channels.

f. Behave responsibly in digital environments

- use digital communication in ways that are appropriate, transparent, and relevant to the activity or role;
- maintain respectful behaviour in emails, messaging apps, online meetings, group chats, and social media interactions connected to CGE;
- follow any rules on digital communication, image sharing, and online safeguarding.

g. Support accountability

- report safeguarding concerns, suspicions, incidents, or breaches in good faith and without undue delay;
- not ignore, minimise, conceal, or excuse inappropriate behaviour;
- cooperate honestly with safeguarding processes.

7.3 Prohibited behaviour

Persons covered by this Policy must not:

a. Abuse, exploit, or neglect others

- engage in any form of physical, emotional, psychological, verbal, or sexual abuse;
- exploit another person's vulnerability, dependency, trust, or unequal position;
- neglect a duty of care where they have responsibility for safety or supervision.

b. Engage in sexual misconduct or harassment

- engage in any sexual activity with a child or minor;
- engage in sexually abusive, coercive, manipulative, or exploitative behaviour toward any person;
- make unwanted sexual comments, jokes, gestures, invitations, or advances;
- create a sexualised, intimidating, degrading, or hostile environment, whether in person or online.

c. Cross inappropriate boundaries

- develop inappropriate, exploitative, secretive, or overly personal relationships with participants;
- spend unnecessary or inappropriate time alone with a child or minor, or with another participant in a way that creates risk or breaches boundaries;
- invite or encourage forms of contact that are not appropriate to the role, context, or age of the persons involved;
- engage in grooming, manipulative behaviour, or any conduct intended to build trust for exploitative purposes.

d. Misuse power or authority

- use a position of trust, responsibility, or influence to pressure, control, intimidate, or gain advantage over another person;
- condition access to participation, opportunities, support, attention, or favourable treatment on compliance, secrecy, affection, or any personal favour;
- abuse organisational authority in ways that undermine safety, dignity, or equality.

e. Engage in discriminatory or degrading behaviour

- use racist, sexist, homophobic, transphobic, ableist, xenophobic, or otherwise degrading language or behaviour;
- humiliate, belittle, shame, threaten, isolate, or intimidate another person;
- tolerate or encourage exclusionary, abusive, or hateful behaviour by others.

f. Use inappropriate physical behaviour

- use physical force, intimidation, or corporal punishment;
- engage in physical contact that is unwanted, inappropriate, intrusive, sexually suggestive, or likely to cause discomfort or harm;
- disregard personal boundaries or cultural sensitivity in physical interactions.

g. Behave irresponsibly in digital or online spaces

- communicate with participants, especially minors, in ways that are secretive, sexualised, manipulative, or inappropriate;
- use personal or private channels in ways that bypass transparency or safeguarding expectations;
- share, store, or circulate personal data, images, recordings, or safeguarding-related information without appropriate consent, purpose, or protection;
- post or distribute content connected to CGE activities that is exploitative, humiliating, unsafe, or in breach of privacy.

h. Discourage or obstruct reporting

- silence, dismiss, or discourage a person from raising a safeguarding concern;
- retaliate against a person for reporting a concern in good faith;
- conceal information, interfere with a report, or obstruct a safeguarding response or review.

7.4 Additional rules where minors are involved

Where children or minors are involved in an activity, all covered persons must exercise heightened care and comply with the Child Protection Annex (Annex 1) in addition to this Policy.

In particular, covered persons must not:

- engage in any sexual, romantic, or otherwise inappropriate conduct with a minor;
- communicate with a minor in a private, secretive, or inappropriate way;
- transport, accommodate, isolate, or supervise a minor alone in ways that breach safeguarding rules, except where this is clearly justified, unavoidable, authorised, and in line with protective measures;
- take, use, or share images of minors without the required consent and safeguarding safeguards.

7.5 Alcohol, substances, and judgement

Persons with responsibility for participants, especially minors, must not place others at risk through intoxication, substance use, or impaired judgement during CGE activities or in contexts connected to their role.

Where alcohol is present in an activity context, covered persons remain fully responsible for maintaining appropriate conduct, boundaries, and duty of care. No person may use alcohol or other substances as an excuse for harmful, exploitative, unsafe, or inappropriate behaviour.

Additional activity-specific rules on alcohol or substances may be set by CGE depending on the nature of the programme, the age of participants, the venue, or the legal context.

7.6 Duty to challenge and report

All covered persons are expected to take seriously any behaviour that may breach this Code of Conduct or place someone at risk. This includes behaviour they experience directly, observe, receive as a disclosure, or reasonably suspect.

Where appropriate and safe, a person may challenge low-level inappropriate behaviour directly. However, safeguarding concerns must not be dealt with only informally where there is risk of harm, abuse, exploitation, harassment, or a breach involving a child or other serious concern. In such cases, the matter must be reported through the appropriate safeguarding channel.

7.7 Breaches of the Code of Conduct

Any breach of this Code of Conduct may result in safeguarding action or other appropriate organisational measures, depending on the seriousness and nature of the behaviour and the role of the person concerned. This may include warnings, removal from an activity, restriction of responsibilities, termination of engagement, suspension of partnership cooperation, referral to relevant authorities, or other appropriate steps.

This Code of Conduct is not exhaustive. Behaviour may still be considered a breach of safeguarding standards even if it is not specifically listed above, where it creates risk,

violates boundaries, abuses trust, or undermines the safety, dignity, or well-being of others.

8. Recruitment, screening, and background checks

CGE is committed to taking reasonable and proportionate steps to reduce the risk of harm by ensuring that persons placed in positions of trust, responsibility, supervision, or access are appropriately recruited, screened, and assessed.

Safeguarding considerations shall form part of recruitment, selection, onboarding, role assignment, and partnership planning, especially where a role involves contact with minors, responsibility for participant welfare, access to personal data, or other safeguarding-sensitive tasks.

8.1 Safer recruitment

CGE shall apply safer recruitment principles to staff, interns, volunteers, facilitators, trainers, consultants, and other persons engaged in roles that may involve safeguarding responsibilities.

Depending on the nature of the role, safer recruitment measures may include:

- making safeguarding expectations clear in role descriptions, calls, or recruitment materials;
- discussing safeguarding responsibilities and behavioural expectations during the recruitment or selection process;
- assessing the suitability of a candidate for working in settings involving trust, supervision, group responsibility, or contact with minors;
- requesting references where appropriate;
- requiring acknowledgement of and commitment to comply with this Policy and related codes of conduct;
- ensuring that selected persons receive safeguarding information or training relevant to their role.

Safer recruitment should be proportionate to the level of responsibility and risk involved. Not all roles require the same level of screening, but all roles should be considered from a safeguarding perspective.

8.2 Screening and suitability assessment

CGE shall take reasonable steps to assess whether a person is suitable for the role they will perform, particularly where the role involves:

- contact with children or minors;
- supervision of participants;
- authority or influence over others;
- access to sensitive personal information;

- travel, accommodation, online contact, or one-to-one interaction in the context of CGE activities.

Suitability assessment may include, where appropriate:

- review of relevant experience and role history;
- discussion of safeguarding awareness and boundaries;
- reference checks;
- confirmation of identity;
- consideration of any known safeguarding-related concerns, where lawful and relevant;
- assessment of whether the person can carry out the role safely and responsibly.

8.3 Background checks

Where required by law, justified by the nature of the role, or necessary as a proportionate safeguarding measure, CGE may require a criminal background check or equivalent document from persons who will work with minors or hold roles involving significant trust, supervision, care, education, training, or comparable contact.

In the German context, this may include the Erweitertes Führungszeugnis⁴, particularly in situations where the requirements of § 72a SGB VIII⁵ are relevant.

Background checks are not a general requirement for all persons involved in CGE activities. They shall be applied on a role-based and risk-based basis, taking into account:

- the age of participants involved;
- the degree and frequency of contact with minors;
- the level of supervision or authority held by the person;
- whether the role involves one-to-one access, overnight stays, travel, or accommodation responsibilities;
- applicable legal requirements;
- proportionality and practical relevance to the role.

CGE shall not require youth participants or ordinary participants in activities to provide criminal background checks solely on the basis of participation.

8.4 Roles for which checks may be required

Background checks may be required, where appropriate and lawful, for example for:

- staff members or long-term volunteers with regular responsibility for minors;
- trainers, facilitators, or group leaders supervising minors during exchanges, workshops, or mobility activities;

⁴ [Erweitertes Führungszeugnis](#)

⁵ [§ 72a SGB VIII](#)

- persons responsible for accommodation, travel, or one-to-one support involving minors;
- persons with repeated and meaningful access to children in the context of CGE activities;
- other roles assessed by CGE as requiring such checks under applicable law or safeguarding risk assessment.

CGE shall determine, on a case-by-case basis, whether a background check is necessary and proportionate for the role concerned.

8.5 Limits of background checks

CGE recognises that background checks are only one element of safer recruitment and do not in themselves guarantee safe behaviour. Safeguarding also depends on clear expectations, training, supervision, boundaries, reporting mechanisms, and organisational culture.

For this reason, background checks must always be complemented by broader safeguarding measures, including onboarding, codes of conduct, activity planning, and reporting procedures.

8.6 Handling of screening and background check information

Any information obtained through recruitment, screening, or background checks shall be handled confidentially and in accordance with applicable data protection law.

CGE shall ensure that:

- only authorised persons have access to such information;
- information is used only for legitimate safeguarding, recruitment, or legal purposes;
- records are stored securely and only for as long as necessary;
- processing is proportionate and respects privacy and confidentiality.

CGE may record that a check has been completed and whether it was satisfactory, without retaining unnecessary underlying personal data where this is not needed.

8.7 Unsuitability and safeguarding concerns in recruitment

CGE may decide not to appoint, engage, or assign a person to a particular role where there are reasonable safeguarding concerns relating to their suitability, conduct, boundaries, or history, to the extent permitted by law.

A person shall not be appointed to a role involving minors where there is a relevant legal or safeguarding reason that makes such engagement inappropriate.

Where concerns arise after recruitment or engagement, CGE may review the person's role, responsibilities, or continued involvement in line with this Policy and any applicable legal or contractual framework.

8.8 Partners and external persons

Where partner organisations, contractors, or external service providers are involved in activities that include minors or other heightened safeguarding risks, CGE may require

appropriate assurances that suitable recruitment and screening measures have been applied by the relevant organisation.

Depending on the context, CGE may require that partners or external providers:

- confirm compliance with applicable safeguarding standards;
- confirm that relevant personnel have undergone legally required or risk-appropriate checks;
- agree to follow CGE safeguarding requirements for the activity;
- provide a designated contact person for safeguarding matters.

8.9 Onboarding and acknowledgement

Persons engaged in safeguarding-relevant roles shall, as appropriate:

- receive this Policy and related safeguarding guidance;
- be informed of reporting routes and expectations;
- acknowledge that they have read and understood the applicable safeguarding standards;
- complete any induction or training required for their role.

Recruitment and screening do not end at the point of appointment. Safeguarding suitability must be supported through continued guidance, supervision, and accountability throughout a person's involvement with CGE.

9. Safeguarding in CGE Activities

CGE integrates safeguarding considerations into the planning, preparation, implementation, and follow-up of all its activities. Given the nature of CGE's work — including youth exchanges, trainings, cultural programmes, international mobility, and non-formal education — particular attention must be paid to group dynamics, supervision, travel, accommodation, and interpersonal boundaries.

Safeguarding in activities is based on risk awareness, prevention, clear expectations, and the ability to respond appropriately to concerns.

9.1 General safeguarding in activities

For all CGE activities, organisers, coordinators, and facilitators shall:

- assess safeguarding risks as part of activity planning;
- define clear roles and responsibilities for supervision and participant support;
- ensure that participants are informed about codes of conduct, expected behaviour, and reporting options;
- establish clear communication channels for support and concerns;
- ensure that safeguarding contacts (Safeguarding Team and email) are known and accessible;
- consider inclusion, accessibility, and potential vulnerabilities within the group;

- ensure that activities are designed and implemented in a way that minimises risk and promotes safety;
- adapt safeguarding measures depending on the age of participants, setting, and type of activity.

Safeguarding must be considered not only during formal sessions, but also during informal time, travel, accommodation, and social interactions linked to the activity.

9.2 Youth exchanges and activities involving minors

Where minors participate in CGE activities, additional safeguarding measures must be applied in line with the Child Protection Annex (Annex 1).

In such cases, CGE shall ensure:

- appropriate supervision arrangements and clear allocation of responsibility;
- that group leaders or responsible adults are identified and accessible at all times;
- that parental or guardian consent is obtained where required;
- that participants and guardians are informed about the nature of the activity, accommodation, travel, and contact arrangements;
- that clear rules are established regarding boundaries, behaviour, and communication;
- that safeguarding contact persons are known to both participants and group leaders;
- that additional care is taken in situations involving accommodation, travel, free time, and one-to-one interaction.

All persons working with minors must act with heightened awareness of boundaries, power dynamics, and duty of care.

9.3 Trainings, workshops, and group-based learning environments

CGE activities often involve participatory, interactive, and sometimes sensitive topics. Facilitators and organisers shall:

- create and communicate safer space principles at the beginning of activities;
- ensure that participation is voluntary and that individuals can opt out of activities where needed;
- be attentive to group dynamics, emotional reactions, and potential discomfort;
- avoid practices that may expose participants to harm, pressure, or unwanted disclosure;
- manage discussions in a respectful and inclusive manner;
- intervene appropriately in cases of inappropriate, discriminatory, or harmful behaviour;
- provide clear options for participants to seek support if needed.

Facilitators must be particularly aware of power dynamics between themselves and participants and maintain appropriate professional boundaries at all times.

9.4 Cultural activities, events, and informal spaces

CGE activities often include informal elements such as social events, cultural evenings, shared meals, or networking spaces. Safeguarding applies equally in these contexts.

Organisers shall:

- ensure that standards of respectful behaviour apply at all times, including outside formal sessions;
- be attentive to group dynamics, inclusion, and possible exclusion or harassment;
- ensure that participants know who to contact in case of discomfort or concern;
- take reasonable steps to prevent and respond to inappropriate behaviour, including harassment, discrimination, or boundary violations;
- ensure that informal spaces do not become environments where safeguarding standards are relaxed or ignored.

9.5 Travel and accommodation

Travel and accommodation are key safeguarding contexts in CGE activities, especially in international mobility projects.

CGE shall ensure, where applicable:

- that travel arrangements are planned with safety and clarity;
- that participants receive relevant information about travel, accommodation, and emergency contacts;
- that supervision responsibilities are clearly defined;
- that accommodation arrangements are appropriate to the age, gender, and needs of participants;
- that room allocation is handled in a way that respects safety, privacy, and inclusion;
- that clear expectations are set regarding behaviour in accommodation settings;
- that participants know how to seek help if needed, including during night-time or emergencies.

Persons in roles of responsibility must avoid situations that involve unnecessary one-to-one isolation with participants, especially minors, unless clearly justified and handled with appropriate safeguards.

9.6 Online and digital activities

CGE uses digital tools for communication, coordination, and online learning. Safeguarding applies equally in digital environments.

Persons covered by this Policy shall:

- use communication channels that are appropriate, transparent, and relevant to the activity;
- avoid private, secretive, or inappropriate communication with participants, especially minors;

- ensure that group communication remains respectful and appropriate;
- respect privacy, consent, and data protection when sharing content, images, or recordings;
- avoid sharing sensitive or personal information without appropriate justification and protection;
- follow any specific rules set for online sessions, recordings, and digital interaction.

CGE shall take reasonable steps to ensure that online environments are safe, moderated where necessary, and aligned with safeguarding standards.

9.7 Use of images, media, and communication

When collecting or using photos, videos, testimonials, or other content, CGE shall ensure:

- that consent is obtained in line with the definition of consent set out in this Policy;
- that additional consent is obtained from parents or guardians where required for minors;
- that individuals are portrayed with dignity and respect;
- that content does not expose individuals to risk, harm, or unwanted identification;
- that sensitive information is not disclosed;
- that data protection and privacy requirements are respected.

CGE shall avoid using images or narratives that are exploitative, misleading, or harmful.

9.8 Alcohol, substances, and behaviour

Where alcohol is present in the context of an activity, CGE shall ensure that:

- expectations regarding responsible behaviour are clearly communicated;
- persons in positions of responsibility maintain appropriate judgement and boundaries at all times;
- no one is placed at risk due to intoxication or substance use;
- additional restrictions are applied where minors are involved, in line with legal and safeguarding requirements.

Substance use must never be used as justification for inappropriate or harmful behaviour.

9.9 Responding to risks during activities

Where safeguarding risks or concerns arise during an activity, organisers and responsible persons shall:

- prioritise immediate safety and well-being;
- take reasonable steps to prevent further harm;

- seek support from the Safeguarding Team (Annex 2) where necessary;
- document and report the concern in line with the reporting procedures;
- avoid handling serious concerns informally or in isolation where there is risk of harm.

All safeguarding concerns must be taken seriously, regardless of the context in which they arise.

9.10 Activity-specific safeguarding measures

Depending on the nature of the activity, CGE may establish additional safeguarding measures, including:

- specific codes of conduct for participants;
- supervision ratios;
- curfews or structured free-time arrangements;
- gender-sensitive or inclusive accommodation arrangements;
- guidelines for external visitors or partners;
- specific rules for high-risk activities or contexts.

Such measures shall be proportionate, clearly communicated, and consistent with this Policy.

10. Reporting Concerns

CGE is committed to ensuring that safeguarding concerns can be reported safely, clearly, and without fear of retaliation. Any person who experiences, witnesses, suspects, or becomes aware of a safeguarding concern connected to CGE activities is encouraged to report it as soon as possible.

Reports may concern actual harm, suspected harm, risk of harm, inappropriate behaviour, breaches of this Policy, or situations where a person feels unsafe or uncomfortable.

10.1 Who can report

Safeguarding concerns may be reported by anyone, including:

- participants;
- children, young people, parents, or guardians;
- staff members;
- volunteers and interns;
- trainers, facilitators, group leaders, and youth workers;
- partner organisations;
- contractors, guests, or third parties;

- witnesses or bystanders.

A concern does not need to be proven before it is reported. It is enough to have a reasonable concern, suspicion, disclosure, or observation.

10.2 What should be reported

The following should be reported:

- abuse, neglect, exploitation, harassment, or violence;
- sexual misconduct, sexual harassment, or sexual exploitation;
- inappropriate behaviour toward a child or minor;
- bullying, intimidation, discrimination, or humiliating behaviour;
- grooming, boundary violations, or inappropriate relationships;
- unsafe supervision, accommodation, travel, or digital communication;
- misuse of personal data, images, or confidential information;
- retaliation or pressure not to report;
- any breach or suspected breach of this Policy or the Child Protection Annex (Annex 1).

If in doubt, the concern should be reported.

10.3 How to report

Safeguarding concerns may be reported through any of the following channels:

- directly to any member of the CGE Safeguarding Team (Annex 2);
- by email to the designated safeguarding address: safeguarding@cge-erfurt.org
- to a CGE staff member, trainer, facilitator, project coordinator, or group leader, who must then forward the concern to the Safeguarding Team (Annex 2) without undue delay;
- to a partner organisation's safeguarding contact, where the activity is jointly organised and this route has been communicated to participants.

When reporting a safeguarding incident, concern, or disclosure in writing, staff, volunteers, partners, and participants are requested to use the standardized Incident Reporting Form provided in Annex 3 of this Policy and submit it within 24 hours to safeguarding@cge-erfurt.org.

Where possible, CGE will ensure that reporting options are communicated clearly before or during activities, including in participant information, event briefings, consent forms, or activity materials.

10.4 What information to include

A report should include, where known:

- the name or description of the person affected;

- the name or description of the person causing concern, if known;
- what happened or what the concern is;
- when and where it happened;
- whether there is any immediate risk or urgent need for support;
- names of any witnesses, if relevant;
- any action already taken.

A person reporting a concern should not investigate the matter themselves or seek to gather evidence beyond what is necessary to explain the concern. The priority is to report the concern safely and promptly.

10.5 Immediate danger or emergency

If a person is in immediate danger, urgent action must be taken to protect their safety. This may include contacting emergency services, medical support, police, child protection services, or other relevant local authorities, depending on the situation and applicable law.

In Germany, emergency services can be contacted through 112 for urgent medical or emergency assistance and 110 for the police.

The Safeguarding Team (Annex 2) should be informed as soon as possible after immediate protective action has been taken.

10.6 Receiving a disclosure

If someone discloses harm, abuse, harassment, exploitation, or another safeguarding concern, the person receiving the disclosure should:

- listen calmly and respectfully;
- take the concern seriously;
- avoid blaming, judging, or questioning the person unnecessarily;
- not promise absolute confidentiality;
- explain that the information may need to be shared with the Safeguarding Team (Annex 2) or relevant authorities in order to protect safety;
- record the basic facts as soon as possible, using the person's own words where relevant;
- report the concern to the Safeguarding Team (Annex 2) without undue delay.

The person receiving the disclosure should not investigate, confront the person accused, or try to resolve the matter alone.

10.7 Anonymous and confidential reporting

CGE will accept anonymous reports where this is possible. However, anonymous reporting may limit CGE's ability to clarify information, provide support, or take follow-up action.

All reports will be handled as confidentially as possible. Information will only be shared on a need-to-know basis, in line with this Policy, applicable law, and data protection requirements.

Confidentiality cannot be guaranteed where there is a serious risk of harm, a legal obligation to act, or a need to protect a child or another person from danger.

10.8 No retaliation

CGE does not tolerate retaliation, intimidation, disadvantage, or adverse treatment against any person who reports a safeguarding concern in good faith or cooperates with a safeguarding process.

Any act of retaliation or pressure not to report may itself be treated as a safeguarding or disciplinary matter.

10.9 Reporting concerns involving the Safeguarding Team

If a concern involves one member of the Safeguarding Team (Annex 2), the report should be made to the other member of the team or directly to the Board.

If a concern involves both members of the Safeguarding Team (Annex 2), the report should be made directly to the Board or to another designated senior person appointed for this purpose.

CGE shall ensure that alternative reporting routes are made clear to staff, volunteers, participants, and partners.

10.10 Recording reports

Safeguarding reports shall be recorded in a secure and confidential manner. Records should be factual, accurate, and limited to what is necessary for safeguarding purposes.

Records shall be stored and processed in line with applicable data protection requirements and accessed only by authorised persons on a need-to-know basis.

10.11 Reporting externally

Some safeguarding concerns may require external reporting or referral, including to child protection services, police, medical services, funders, insurers, or other competent authorities.

The decision to report externally shall be made by the Safeguarding Team (Annex 2), the Board, or other responsible persons as appropriate, taking into account:

- immediate safety;
- legal obligations;
- the best interests of the child, where a child is involved;
- the rights, wishes, and safety of the victim, where possible;
- confidentiality and data protection requirements;
- the seriousness and nature of the concern.

Where there is immediate danger or a legal duty to act, external reporting must not be delayed.

11. Response and Case Handling

CGE is committed to responding to safeguarding concerns in a timely, careful, fair, and proportionate manner. All concerns shall be taken seriously and handled with respect for the safety, dignity, rights, and privacy of the persons involved.

The response to a safeguarding concern will depend on the nature, seriousness, urgency, and context of the matter. In all cases, CGE shall prioritise immediate safety, prevention of further harm, and appropriate follow-up.

11.1 Initial response

When a safeguarding concern is received, the Safeguarding Team (Annex 2) shall make an initial assessment of the situation and identify any immediate risks.

The initial response may include:

- checking whether anyone is in immediate danger;
- ensuring that urgent medical, psychological, or protective support is provided where needed;
- taking steps to prevent further contact or harm where appropriate;
- identifying whether a child or minor is involved;
- deciding whether external authorities or services must be contacted;
- ensuring that the concern is documented securely;
- clarifying who within CGE needs to be informed on a need-to-know basis.

The initial response should be taken as soon as reasonably possible after the concern is received.

11.2 Immediate protective measures

Where there is a risk of further harm, CGE may take immediate protective measures before any final conclusion is reached.

Such measures may include:

- separating the persons involved during an activity;
- changing supervision, accommodation, travel, or group arrangements;
- restricting access to participants, minors, information, or spaces;
- suspending a person from specific duties or activities;
- ensuring that a participant has access to a trusted contact or support person;
- contacting parents, guardians, emergency services, child protection services, or other competent authorities where necessary.

Protective measures are not disciplinary findings. They are precautionary steps intended to protect safety and well-being while the concern is assessed.

11.3 Case assessment

The Safeguarding Team (Annex 2) shall assess the concern and determine the appropriate next steps. This assessment should consider:

- the seriousness and type of concern;
- whether a child, minor, or adult at risk is involved;
- whether there is an immediate or ongoing risk;
- whether the concern involves a person in a position of trust or responsibility;
- whether the matter may involve criminal conduct;
- whether external reporting or referral is required;
- whether the concern can be handled internally or requires external support;
- the wishes, safety, and well-being of the victim, where appropriate;
- applicable legal, contractual, or donor obligations.

Where necessary, the Safeguarding Team (Annex 2) may consult the Board, legal advice, child protection services, specialised support organisations, or other competent external bodies.

11.4 Handling concerns internally

Some concerns may be handled internally where they do not require external authority involvement and where it is safe and appropriate to do so.

Internal responses may include:

- clarification of expectations;
- mediation only where appropriate and never in cases of abuse or coercion;
- additional supervision or support;
- training or guidance;
- formal warning;
- restriction of responsibilities;
- removal from an activity;
- termination of engagement, contract, or cooperation;
- review of procedures to prevent recurrence.

Internal handling must never be used to minimise or conceal serious safeguarding concerns, criminal conduct, or risks to children or others.

11.5 Involvement of external authorities or services

CGE shall involve external authorities or services where required by law, where a person is in immediate danger, where a child may be at risk of significant harm, or where the seriousness of the concern requires external intervention.

This may include contact with:

- emergency services;
- police;
- child and youth welfare services;
- medical or psychological support services;
- specialised victim support organisations;
- legal advice;
- funders or institutional bodies where contractual reporting duties apply.

Where children are involved, CGE shall act in line with the best interests of the child and applicable child protection obligations.

11.6 Handling concerns involving children or minors

Where a safeguarding concern involves a child or minor, the Child Protection Annex (Annex 1) applies in addition to this Policy.

In such cases, CGE shall:

- prioritise the child's safety, dignity, and well-being;
- avoid unnecessary questioning or repeated disclosure;
- involve parents or guardians where appropriate and safe;
- avoid involving parents or guardians where this could place the child at further risk;
- assess whether child and youth welfare services or other competent authorities should be contacted;
- ensure that any action is guided by the best interests of the child.

11.7 Fairness and rights of all persons involved

CGE shall handle safeguarding concerns fairly and without prejudice. While safety and protection are the priority, the rights and dignity of all persons involved must be respected.

This means that:

- concerns are assessed carefully and impartially;
- information is not shared unnecessarily;
- the person who is the subject of a concern is treated fairly;
- action is proportionate to the nature and seriousness of the concern;
- decisions are documented;
- conflicts of interest are avoided.

Fair process does not prevent CGE from taking immediate protective measures where safety requires it.

11.8 Confidentiality and information sharing

Information relating to safeguarding concerns shall be shared only on a need-to-know basis.

CGE shall ensure that:

- records are stored securely;
- identifying information is shared only where necessary;
- participants and victims are informed, where appropriate, about how their information may be used;
- data protection requirements are respected;
- confidentiality is balanced with the need to protect people from harm.

Confidentiality cannot be guaranteed where there is a serious risk of harm, a legal obligation to report, or a need to protect a child or another person from danger.

11.9 Documentation and records

All safeguarding concerns and responses shall be documented in a factual, accurate, and secure manner.

Records should include, where relevant:

- the date and time the concern was received;
- who reported the concern;
- the person affected, if known;
- the person causing concern, if known;
- a factual description of the concern;
- immediate risks identified;
- action taken;
- persons or authorities contacted;
- decisions made and reasons for them;
- follow-up steps.

Records should avoid speculation, judgemental language, or unnecessary personal details.

11.10 Follow-up and support

CGE shall consider appropriate follow-up for those affected by a safeguarding concern. This may include:

- checking whether immediate safety needs have been addressed;
- providing information about support options;
- adjusting participation, accommodation, or activity arrangements;
- supporting access to external services where appropriate;

- reviewing whether further organisational action is needed;
- informing relevant persons about outcomes where appropriate and lawful.

CGE cannot guarantee every requested outcome, but it shall seek to respond with care, seriousness, and accountability.

11.11 Learning and prevention

After a safeguarding concern has been handled, CGE may review the case to identify whether changes are needed to prevent similar concerns in the future.

This may include reviewing:

- activity planning;
- supervision arrangements;
- accommodation or travel procedures;
- communication practices;
- partner arrangements;
- training needs;
- reporting routes;
- risk assessments;
- the Policy or related procedures.

Learning reviews should protect confidentiality and focus on improving safeguarding practice rather than exposing unnecessary personal information.

11.12 Closing a case

A safeguarding case may be closed when:

- immediate risks have been addressed;
- appropriate action or referral has been completed;
- necessary documentation has been finalised;
- relevant follow-up has been considered;
- no further action is currently required by CGE.

The decision to close a case shall be documented by the Safeguarding Team (Annex 2), including the reasons for closure and any recommended follow-up or monitoring.

A case may be reopened if new information becomes available or further risks arise.

12. Confidentiality, Record-Keeping, and Data Protection

CGE is committed to handling all safeguarding-related information with care, confidentiality, and respect for privacy. Safeguarding information may include sensitive personal data and must therefore be processed only where necessary, proportionate, lawful, and secure.

This section applies to safeguarding concerns, incident reports, disclosures, notes, communications, consent forms, background check records, participant information, images, recordings, and any other personal data processed in connection with safeguarding.

12.1 Confidentiality

Safeguarding concerns shall be handled confidentially and shared only on a need-to-know basis.

This means that information may be shared only with persons who need it in order to:

- protect a person from harm;
- respond to a safeguarding concern;
- fulfil a legal, contractual, or organisational responsibility;
- provide appropriate support;
- manage risk;
- ensure accountability.

Confidentiality must not be used to hide, ignore, or delay action on a safeguarding concern. Where there is a serious risk of harm, a legal obligation to act, or a need to protect a child or another person, CGE may need to share information with relevant authorities, services, or responsible persons.

12.2 Data protection principles

Safeguarding-related data shall be processed in accordance with the General Data Protection Regulation (GDPR), relevant German data protection law, and CGE's internal data protection procedures.

CGE shall apply the following principles:

- personal data shall be processed lawfully, fairly, and transparently;
- data shall be collected only for specific and legitimate safeguarding purposes;
- only data that is necessary and proportionate shall be collected;
- data shall be accurate and, where necessary, kept up to date;
- data shall be stored only for as long as necessary;
- data shall be protected against unauthorised access, loss, misuse, or disclosure;
- CGE shall be able to demonstrate accountability in how safeguarding-related data is handled.

12.3 Recording safeguarding concerns

All safeguarding concerns shall be recorded in a factual, accurate, and timely manner.

Records should include only information that is relevant and necessary, such as:

- date and time of the report;

- name and role of the person making the report, where known;
- name or description of the person affected, where known;
- name or description of the person causing concern, where known;
- factual description of what happened or what was reported;
- immediate risks identified;
- action taken;
- persons or authorities contacted;
- decisions made and reasons for them;
- follow-up steps.

Records should avoid speculation, assumptions, emotional language, unnecessary personal details, or unverified conclusions.

Where possible, disclosures should be recorded using the person's own words.

12.4 Storage and access

Safeguarding records shall be stored securely and separately from general project documentation wherever possible.

CGE shall ensure that:

- access is limited to authorised persons;
- records are protected by appropriate physical or digital security measures;
- electronic files are stored in secure, access-restricted locations;
- paper records, where used, are stored in locked or otherwise secure locations;
- safeguarding records are not stored casually in shared drives, personal devices, open folders, or unsecured communication channels;
- access is reviewed where roles change or where continued access is no longer necessary.

12.5 Sharing information

Safeguarding information may be shared internally or externally only where there is a clear safeguarding, legal, contractual, or support-related reason to do so.

Before sharing information, CGE shall consider:

- whether sharing is necessary to protect someone from harm;
- whether there is a legal or contractual obligation to share;
- whether the person affected can be informed or consulted;
- whether identifying information is necessary;
- whether information can be anonymised or minimised;
- how the information can be shared securely;

- who genuinely needs to receive the information.

Where information is shared externally, CGE shall document what was shared, with whom, when, and why.

12.6 Consent and limits of confidentiality

Where appropriate, CGE shall seek to inform the person affected about how their information may be used and shared. However, consent is not always required or sufficient where there is a serious safeguarding risk, a legal obligation, or a need to protect a child or another person from harm.

CGE shall not promise absolute confidentiality. Persons making reports or disclosures should be informed, in a sensitive and appropriate way, that information may need to be shared with the Safeguarding Team (Annex 2), relevant authorities, or support services where necessary to protect safety or fulfil legal obligations.

12.7 Data relating to children and minors

Information relating to children and minors shall be handled with particular care.

CGE shall ensure that:

- only necessary information about minors is collected;
- parental or guardian consent is obtained where legally or procedurally required;
- children are informed in an age-appropriate way about how their information may be used, where appropriate;
- identifying information is not shared unnecessarily;
- images, recordings, and personal stories involving minors are used only with proper consent and safeguarding safeguards;
- information is not shared with parents or guardians where doing so may place the child at further risk.

12.8 Images, recordings, and media content

Photos, videos, audio recordings, testimonials, and other media content involving participants shall be collected, stored, and used in line with consent, safeguarding, and data protection requirements.

CGE shall ensure that:

- consent is obtained before collecting or using identifiable images or recordings;
- additional parental or guardian consent is obtained where required for minors;
- consent is specific to the intended use and can be withdrawn;
- people are not pressured to appear in images, videos, or stories;
- content does not expose individuals to risk, stigma, humiliation, or unwanted identification;
- images and stories are respectful, accurate, and dignified;

- identifying information is minimised, especially for minors or persons in vulnerable situations.

12.9 Background check information

Information relating to criminal background checks or suitability screening shall be handled with particular confidentiality.

CGE shall collect and retain only what is necessary and lawful. Where possible, CGE should record that a check has been completed and whether it was satisfactory, rather than keeping unnecessary copies or detailed personal information.

Access to background check information shall be limited to authorised persons with a clear role-based need.

12.10 Retention and deletion

Safeguarding records shall be retained only for as long as necessary for safeguarding, legal, organisational, contractual, or accountability purposes.

CGE shall define appropriate retention periods for:

- safeguarding incident records;
- consent forms;
- media consent forms;
- participant information;
- recruitment and screening documents;
- background check confirmations;
- training attendance records.

When information is no longer needed, it shall be securely deleted, anonymised, or destroyed, unless retention is required by law or justified by safeguarding considerations.

12.11 Data breaches

If safeguarding-related personal data is lost, accessed without authorisation, disclosed inappropriately, or otherwise compromised, CGE shall respond in line with applicable data protection requirements and internal procedures.

This may include:

- assessing the risk to affected persons;
- taking steps to contain and reduce harm;
- informing responsible persons within CGE;
- documenting the breach;
- notifying competent data protection authorities or affected persons where legally required.

12.12 Secure communication

Safeguarding-related communication should be handled through secure and appropriate channels.

Persons covered by this Policy shall avoid:

- discussing safeguarding concerns in public or informal settings;
- forwarding sensitive information to unnecessary recipients;
- using personal messaging apps for detailed safeguarding records where avoidable;
- storing confidential information on personal devices without protection;
- sharing screenshots, images, or documents containing sensitive information without a clear safeguarding purpose.

Where urgent communication is necessary, information shared should be limited to what is necessary, and fuller documentation should be stored securely afterwards.

12.13 Access rights and transparency

CGE recognises that individuals may have rights under data protection law in relation to their personal data. Requests for access, correction, deletion, or restriction of safeguarding-related data shall be handled carefully, taking into account:

- data protection rights;
- the rights and safety of others;
- confidentiality obligations;
- ongoing safeguarding processes;
- legal retention requirements;
- the need to protect children or other persons from harm.

Such requests should be reviewed by authorised persons and, where necessary, with appropriate legal or data protection advice.

13. Partner Organisations and Third Parties

CGE works with partner organisations, service providers, venues, trainers, facilitators, volunteers, consultants, and other third parties in the preparation and delivery of its activities. These collaborations are important to CGE's work, but they may also create safeguarding responsibilities and risks. CGE shall therefore take reasonable and proportionate steps to ensure that partners and third parties involved in its activities understand and respect applicable safeguarding standards.

13.1 General expectations

Partner organisations and third parties involved in CGE activities are expected to:

- act in ways that protect the safety, dignity, and well-being of participants;
- comply with applicable law and relevant safeguarding obligations;
- respect CGE's safeguarding standards, codes of conduct, and activity-specific rules;

- cooperate with CGE in preventing and responding to safeguarding concerns;
- report any safeguarding concern connected to a CGE activity without undue delay;
- ensure that their own staff, volunteers, representatives, or subcontractors behave appropriately.

13.2 Partner safeguarding standards

Before or during cooperation, CGE may ask partner organisations to confirm that they have appropriate safeguarding arrangements in place, especially where the project involves minors, travel, accommodation, residential activities, or other heightened safeguarding risks.

Depending on the activity, this may include:

- a safeguarding or child protection policy;
- a code of conduct;
- a designated safeguarding contact person;
- procedures for reporting and responding to concerns;
- safer recruitment or screening measures for adults working with minors;
- appropriate supervision and activity planning;
- data protection and consent procedures.

Where a partner organisation does not have its own safeguarding policy, CGE may require the partner to follow CGE's safeguarding standards for the relevant activity.

13.3 Partnership agreements and project arrangements

Where appropriate, safeguarding expectations shall be included in partnership agreements, memoranda of understanding, project contracts, service agreements, or activity planning documents.

Such arrangements may specify:

- which safeguarding standards apply;
- who is responsible for participant welfare during different parts of the activity;
- who receives and handles safeguarding concerns;
- how concerns are communicated between organisations;
- what supervision, travel, accommodation, and consent arrangements are required;
- whether background checks or equivalent screening are needed for adults working with minors;
- how personal data and safeguarding information will be handled;
- how urgent risks or serious incidents will be escalated.

Safeguarding responsibilities should be clarified before the activity begins whenever possible.

13.4 Joint activities and shared responsibility

In joint projects, safeguarding is a shared responsibility. CGE and partner organisations shall cooperate to ensure that participants know:

- expected standards of behaviour;
- who they can contact for support;
- how to report concerns;
- what rules apply during travel, accommodation, activities, and informal time.

Where responsibilities are divided between CGE and partner organisations, this should be clearly communicated to staff, group leaders, facilitators, volunteers, and participants.

13.5 Activities involving minors

Where a partner or third party is involved in an activity with minors, additional safeguarding requirements apply.

CGE may require confirmation that:

- adults responsible for minors are suitable for their role;
- legal requirements relating to child protection and background checks are met where applicable;
- parental or guardian consent has been obtained where required;
- supervision arrangements are appropriate;
- accommodation and travel arrangements are safe and suitable;
- communication with minors follows safeguarding rules;
- concerns involving minors will be reported and handled without delay.

These requirements should be aligned with the Child Protection Annex (Annex 1) and applicable law.

13.6 Service providers and external contractors

Service providers and external contractors may include, for example, accommodation providers, transport providers, venues, interpreters, photographers, catering providers, technical support, or external consultants.

CGE shall assess the safeguarding relevance of each service provider according to their role and level of contact with participants. Where relevant, CGE may:

- provide safeguarding information or briefing;
- include safeguarding clauses in contracts or agreements;
- restrict unsupervised access to participants, especially minors;
- clarify rules on photography, data, privacy, and communication;
- require reporting of concerns linked to the activity;

- ensure that service providers understand behavioural expectations.

13.7 Visitors, guests, media, and donors

Visitors, guests, observers, media representatives, and donors attending CGE activities must respect the safeguarding standards of the activity.

Where their presence involves direct contact with participants, especially minors, CGE may require:

- prior briefing on safeguarding expectations;
- signing or acknowledging a code of conduct;
- supervision by a CGE representative;
- restrictions on photography, filming, interviews, or direct communication;
- consent from participants and, where required, parents or guardians;
- clear rules on the use of collected content.

13.8 Concerns involving partners or third parties

If a safeguarding concern involves a partner organisation, contractor, service provider, guest, or other third party, CGE shall take appropriate action according to the seriousness and nature of the concern.

This may include:

- immediate protective measures;
- informing the relevant partner or organisation, where safe and appropriate;
- restricting or ending the person's access to participants or activities;
- suspending or terminating cooperation;
- reporting to external authorities where required;
- reviewing future cooperation and risk controls.

CGE shall not continue cooperation where there is a serious unresolved safeguarding risk that cannot be adequately managed.

13.9 Proportionality

CGE recognises that partners and third parties may differ in size, structure, and capacity. Safeguarding requirements should therefore be proportionate to the nature of the cooperation and the level of risk involved.

However, proportionality must not be used to justify ignoring serious risks, especially where minors, adults at risk, travel, accommodation, or positions of trust are involved.

14. Training and Review

CGE is committed to ensuring that safeguarding is understood, implemented, and regularly reviewed across the organisation. Training, awareness-raising, and policy review are essential to making safeguarding practical and effective.

14.1 Safeguarding training

CGE shall provide safeguarding information or training to persons whose role involves responsibility for participants, contact with minors, facilitation, supervision, coordination, or access to safeguarding-sensitive information.

This may include:

- staff members;
- board members;
- volunteers and interns;
- trainers, facilitators, group leaders, and youth workers;
- project coordinators;
- partner representatives where relevant;
- other persons involved in activities with safeguarding responsibilities.

The level and format of training shall be proportionate to the role, responsibilities, and risks involved.

14.2 Content of training

Safeguarding training may cover:

- the purpose and scope of this Policy;
- expected and prohibited behaviour;
- boundaries and power dynamics;
- child protection principles where minors are involved;
- recognising safeguarding concerns;
- receiving disclosures appropriately;
- reporting procedures and contact points;
- confidentiality and data protection;
- safeguarding in travel, accommodation, online communication, and group activities;
- specific risks related to youth exchanges, trainings, cultural events, and non-formal education.

14.3 Induction and onboarding

Persons joining CGE or taking on safeguarding-relevant roles shall receive safeguarding information as part of their induction or onboarding.

This may include:

- access to this Policy and the Child Protection Annex (Annex 1);
- information about the Safeguarding Team (Annex 2) and reporting email;
- acknowledgement of the Code of Conduct;

- role-specific safeguarding guidance;
- information on activity-specific risks and procedures.

14.4 Refresher training

CGE shall provide refresher safeguarding training or awareness-raising at appropriate intervals, especially for persons with ongoing responsibility for participants or minors.

Refresher training may also be provided when:

- the Policy is updated;
- new legal or organisational requirements arise;
- a safeguarding concern reveals a need for further learning;
- staff, volunteers, or partners take on new responsibilities;
- a project involves heightened safeguarding risks.

14.5 Activity-specific briefings

Before activities involving heightened safeguarding considerations, CGE may provide specific safeguarding briefings for staff, facilitators, group leaders, volunteers, partners, or participants.

This is particularly important for:

- activities involving minors;
- residential activities;
- international youth exchanges;
- travel and accommodation;
- online activities involving young people;
- events involving external guests, media, or public audiences;
- activities addressing sensitive topics.

14.6 Documentation of training

CGE shall keep appropriate records of safeguarding training and briefings, where relevant. These may include:

- dates of training;
- names or roles of participants;
- training topics covered;
- materials used;
- acknowledgement of policy or code of conduct.

Training records shall be handled in accordance with applicable data protection requirements.

14.7 Policy review

This Policy and the Child Protection Annex (Annex 1) shall be reviewed periodically to ensure that they remain relevant, practical, legally compliant, and appropriate to CGE's work.

A review should take place:

- at regular intervals, for example every two years;
- after serious safeguarding concerns or incidents, where relevant;
- when there are significant changes in CGE's activities, structure, or legal obligations;
- when partner, donor, or project requirements make updates necessary;
- when feedback from staff, volunteers, participants, or partners indicates that improvements are needed.

14.8 Responsibility for review

The Safeguarding Team (Annex 2) shall coordinate the review of this Policy, in consultation with the Board and other relevant persons where appropriate.

The review may consider:

- whether the Policy is clear and accessible;
- whether reporting routes are known and usable;
- whether roles and responsibilities are understood;
- whether activity-specific safeguarding measures are sufficient;
- whether training and awareness are adequate;
- whether annexes, forms, and practical tools need to be updated;
- whether legal references remain current.

14.9 Learning and continuous improvement

CGE is committed to learning from practice and improving its safeguarding approach over time. Feedback, concerns, activity evaluations, and case reviews may all help identify ways to strengthen prevention, reporting, and response.

Safeguarding review should focus not only on compliance, but also on whether CGE's activities are genuinely safe, inclusive, respectful, and accessible for the people involved.

14.10 Communication of updates

When this Policy or related procedures are updated, CGE shall ensure that relevant persons are informed. This may include staff, board members, volunteers, facilitators, trainers, partners, and participants where appropriate.

Updated versions of the Policy shall be made accessible through appropriate organisational channels.

Annex 1: Child Protection

1. Purpose

This Child Protection Annex sets out additional rules, responsibilities, and procedures that apply when children (persons under the age of 18) are involved in Culture Goes Europe e.V. (CGE) activities.

It complements the main Safeguarding Policy and must be read together with it.

The purpose of this Annex is to:

- ensure a high level of protection for children participating in CGE activities;
- clarify expectations and boundaries for adults in contact with children;
- prevent harm, abuse, neglect, exploitation, and unsafe situations;
- ensure that concerns involving children are recognised, reported, and responded to appropriately;
- provide clear guidance for activities involving minors, including youth exchanges, travel, accommodation, and online interaction.

2. Scope

This Annex applies to all CGE activities that involve children, including but not limited to:

- youth exchanges;
- workshops, trainings, and events involving minors;
- local or international mobility activities;
- online activities involving minors;
- any situation where a child participates in, is present at, or is affected by a CGE activity.

It applies to all persons covered by the Safeguarding Policy, with particular relevance for:

- staff members;
- trainers, facilitators, group leaders, and youth workers;
- volunteers and interns;
- partner organisations and their representatives;
- any adult with responsibility, supervision, or contact with children.

3. Core principles for child protection

In addition to the principles set out in the main Policy, the following apply:

- The best interests of the child shall always be a primary consideration.
- Children have the right to be safe, respected, and heard.

- Child participation must be voluntary, informed, and appropriate to age and development.
- Safeguarding measures must take into account power imbalances between adults and children.
- Prevention of harm is the primary objective.
- Responses must be child-centred, prioritising safety, dignity, and well-being.

4. Responsibilities when working with children

Any person working with or in contact with children in CGE activities shall:

- act as a positive role model;
- maintain appropriate professional and personal boundaries;
- ensure that interactions are appropriate to the child's age and context;
- avoid situations that create unnecessary risk, misunderstanding, or harm;
- follow supervision and safety arrangements defined for the activity;
- be aware of signs of distress, discomfort, or potential harm;
- report any safeguarding concern involving a child without delay.

5. Specific rules of behaviour

5.1 Prohibited behaviour (non-negotiable)

The following are strictly prohibited:

- any sexual activity with a child;
- any sexualised behaviour, communication, or suggestion involving a child;
- grooming, manipulation, or building inappropriate emotional dependency;
- spending unnecessary or inappropriate time alone with a child in a private or isolated setting;
- engaging in secretive communication with a child;
- taking a child alone to private spaces, accommodation rooms, or transport without justification and safeguards;
- physical punishment or use of force;
- humiliating, degrading, intimidating, or shaming behaviour;
- discrimination or exclusion of a child;
- ignoring or failing to act on concerns of harm;
- sharing personal contact details for private communication where not appropriate;
- taking or sharing images of a child without proper consent and safeguards.

5.2 Appropriate behaviour

When interacting with children, adults must:

- ensure that interactions are open, visible, and appropriate;
- maintain clear boundaries between professional/support roles and personal relationships;
- communicate respectfully and in an age-appropriate way;
- ensure that physical contact (if any) is appropriate, non-intrusive, and respectful;
- avoid favouritism or singling out children in ways that create dependency;
- ensure that children are not placed in situations of discomfort or pressure;
- involve more than one adult where possible in supervision situations;
- ensure transparency in communication, especially in digital contexts.

6. Supervision and ratios

CGE shall ensure appropriate supervision arrangements depending on:

- the age of participants;
- the type of activity;
- the setting (local, residential, international);
- the level of risk.

Where possible:

- more than one responsible adult should be present;
- children should not be left unsupervised in unsafe environments;
- roles and responsibilities for supervision must be clearly defined.

7. Travel and accommodation

When activities involve travel or accommodation, CGE shall ensure:

- parental or guardian consent is obtained in advance;
- children and guardians receive clear information about arrangements;
- accommodation is safe, appropriate, and respects privacy and inclusion;
- room arrangements are age-appropriate and safe;
- adults do not share rooms with children unless clearly justified and authorised;
- clear rules are established regarding night-time supervision and movement;
- children know who to contact at any time if they feel unsafe.

8. Communication with children (including digital)

Communication with children must be:

- appropriate, transparent, and related to the activity;

- conducted through agreed and visible channels where possible;
- respectful of boundaries and safeguarding standards.

Adults must not:

- engage in private, secretive, or personal messaging with children;
- communicate in ways that are sexualised, manipulative, or inappropriate;
- move communication to private platforms without transparency.

Where digital communication is necessary:

- group channels or visible communication should be used where possible;
- parents or guardians may need to be informed depending on context;
- communication must remain professional and documented where appropriate.

9. Consent and participation

CGE shall ensure that:

- participation of children is voluntary;
- children are informed, in an age-appropriate way, about the activity;
- parental or guardian consent is obtained where required;
- children understand that they can withdraw from activities;
- children are not pressured to share personal experiences;
- consent is obtained for images, recordings, and media use.

10. Recognising and responding to concerns involving children

Any concern involving a child must be treated as a priority.

Where a concern arises:

- the child's immediate safety must be prioritised;
- the concern must be reported to the Safeguarding Team (Annex 2) without delay;
- the person receiving the concern must follow the reporting guidance in Section 10;
- the matter must not be handled informally where there is risk of harm;
- external authorities must be involved where required by law or necessary for protection.

11. Involvement of parents or guardians

Parents or guardians should be informed:

- before participation, through consent and information sharing;
- in case of incidents, where appropriate and safe.

However, CGE shall not inform parents or guardians where:

- this may place the child at further risk;
- there are concerns involving the family;
- external authorities advise against it.

12. External reporting and child protection services

Where there is a risk of significant harm to a child, CGE shall consider or carry out reporting to:

- child and youth welfare services (Jugendamt⁶ in Germany);
- police or emergency services;
- other competent authorities.

Decisions shall be guided by:

- the best interests of the child;
- legal obligations;
- safety considerations.

13. Breaches of this Annex

Any breach of this Child Protection Annex shall be treated as a serious safeguarding matter and may result in:

- immediate removal from activity;
- restriction of responsibilities;
- termination of engagement;
- reporting to authorities;
- termination of partnerships;
- other appropriate action.

14. Relationship to the Safeguarding Policy

This Annex forms an integral part of the CGE Safeguarding Policy.

Where children are involved:

- this Annex applies in addition to all sections of the main Policy;
- in case of uncertainty, the higher standard of protection shall apply.

⁶ [Jugendamt](#) - Sozialgesetzbuch (SGB) - Achtes Buch (VIII) - Kinder- und Jugendhilfe - (Artikel 1 des Gesetzes v. 26. Juni 1990, BGBl. I S. 1163)

§ 1 Recht auf Erziehung, Elternverantwortung, Jugendhilfe

Annex 2: Safeguarding Team

1. Purpose

This Annex identifies the CGE Safeguarding Team and explains its role, competences, responsibilities, and contact routes.

The Safeguarding Team is responsible for supporting the implementation of the Safeguarding Policy, receiving safeguarding concerns, coordinating appropriate follow-up, and promoting a safe, respectful, and accountable environment across CGE activities.

2. Safeguarding Team contact

Safeguarding concerns, complaints, or questions may be addressed to the Safeguarding Team through the following email:

safeguarding@cge-erfurt.org

Concerns may also be reported directly to either member of the Safeguarding Team.

3. Composition of the Safeguarding Team

The CGE Safeguarding Team is composed of two designated persons:

Safeguarding Team Member 1

Name: Mariana Matoso

Role within CGE: Project Coordinator

Relevant background and competences:

Mariana Matoso is an experienced project coordinator, trainer, and licensed Europsy Community Psychologist, with a Master's degree in Community Psychology and the Protection of Children and Youth at Risk. She has more than 10 years of experience in youth work, inclusion, non-formal education, and community-based intervention with children, young people, families, schools, and marginalised groups.

Her professional background includes work in Child Protection Services in Portugal, coordination of a youth and community project for children and young people aged 6–18, and several years of experience as a summer camp monitor for children. In these roles, she supported socio-emotional development, prevention of risk situations, crisis response, parental skills, and the creation of safe learning environments.

Mariana has extensive experience designing, implementing, and evaluating non-formal education programmes in schools, youth centres, community settings, and Erasmus+ mobility projects. She is a certified pedagogical trainer and has facilitated activities on social-emotional learning, civic engagement, inclusion, sustainability, outdoor education, and youth participation.

Her competences relevant to the Safeguarding Team include child protection awareness, psychosocial support, participant support, facilitation of sensitive group dynamics, risk prevention, non-formal education, family and school cooperation, coordination with institutional networks, and experience working with diverse and vulnerable groups.

Safeguarding Team Member 2

Name: Moritz Borchardt

Role within CGE: Board Member (Treasurer)

Relevant background and competences:

Moritz Borchardt has been involved in European-funded NGOs since 2011 and has 10+ years of full-time professional experience in the field of international non-formal education. He has studied in Erfurt, Vilnius and Jena and holds a Masters Degree (M.P.P.) from the Willy Brandt School of Public Policy at the University of Erfurt. His work is centered on combining structural issues of (civil) society with efforts to promote true equality among all members of society and to empower young people to actively contribute to the overall welfare of communities across Europe.

Moritz has led diverse teams and mentored diverse young people throughout his work in civil society organisations, contributed to the development of Standards International Youth Work in the Free State of Thuringia, and participated in the SchutzJu project, focusing on the value and development of safeguarding- and protection policies, that was co-organised by the German Erasmus+ National Agency for Youth and the University of Kassel. In CGE, Moritz Borchardt is active in an advisory role to the full-time staff, and regularly present during quarterly project management days as well as in his role as Treasurer of the Board.

Outside of his long-term involvement in CGE Erfurt e.V., Moritz Borchardt is the head of Department for Civil Society Projects at KulturLife gGmbH in Kiel and Chairperson of the Democracy and Human Rights Education in Europe (DARE) network, registered in Brussels, Belgium.

4. Appointment criteria

Members of the Safeguarding Team should be appointed based on their suitability for the role, including:

- relevant experience in youth work, education, facilitation, participant support, safeguarding, or related areas;
- ability to respond calmly and sensitively to concerns or disclosures;
- understanding of confidentiality, boundaries, and data protection;
- knowledge of CGE activities and participant groups;
- capacity to coordinate appropriate follow-up;
- trustworthiness, impartiality, and sound judgement.

5. Responsibilities of the Safeguarding Team

The Safeguarding Team is responsible for:

- receiving safeguarding concerns, complaints, and disclosures;
- providing guidance on safeguarding questions;
- assessing immediate risks and identifying protective measures;
- documenting concerns securely and confidentially;
- coordinating follow-up in line with the Safeguarding Policy;
- advising staff, volunteers, facilitators, trainers, and partners;
- supporting safeguarding risk assessments for activities;
- ensuring that safeguarding information is shared only on a need-to-know basis;
- consulting the Board, external professionals, or authorities where necessary;
- contributing to training, awareness-raising, and policy review.

6. Availability and response

The Safeguarding Team shall make reasonable efforts to respond to safeguarding concerns in a timely manner.

Where a concern is urgent or someone is in immediate danger, emergency services or competent authorities should be contacted first. The Safeguarding Team should then be informed as soon as possible.

In Germany:

- 112 may be contacted for urgent medical or emergency assistance;
- 110 may be contacted for the police.

7. Conflict of interest

If a safeguarding concern involves one member of the Safeguarding Team, the concern should be handled by the other member and, where necessary, escalated to the Board.

If a concern involves both members of the Safeguarding Team, the concern should be reported directly to the Board or to another designated senior person appointed for this purpose.

The Safeguarding Team must not handle a concern where they have a personal, professional, or organisational conflict of interest that could affect impartiality.

8. Confidentiality and records

The Safeguarding Team shall handle all safeguarding information confidentially and in accordance with the Safeguarding Policy, GDPR, and relevant German data protection requirements.

Safeguarding records shall be:

- factual and accurate;

- limited to necessary information;
- stored securely;
- accessed only by authorised persons;
- shared only on a need-to-know basis;
- retained or deleted according to CGE's data protection and retention procedures.

9. Visibility of the Safeguarding Team

CGE shall ensure that staff, volunteers, facilitators, partners, and participants know how to contact the Safeguarding Team.

This may be done through:

- participant information packs;
- staff and volunteer onboarding;
- project briefings;
- event materials;
- consent forms;
- internal documents;
- CGE's website or other appropriate communication channels.

10. Review and update of this Annex

This Annex shall be reviewed whenever:

- the composition of the Safeguarding Team changes;
- contact details change;
- safeguarding responsibilities are updated;
- the Safeguarding Policy is reviewed;
- practical experience shows that reporting routes or team arrangements need improvement.

Updated versions of this Annex shall be communicated to relevant persons.

Annex 3: Safeguarding & Child Protection Incident Reporting Form Template

This form must be completed whenever a child protection or safeguarding concern, suspicion, or incident arises within any activity linked to Culture Goes Europe (CGE) e.V.

The completed form must be transmitted without undue delay (within 24 hours) to the Safeguarding Team at: safeguarding@cge-erfurt.org.

1. GENERAL INFORMATION

Date of Report: _____ Time of Report: _____

Name of Person Reporting: _____

Role / Function in Project/Activity: _____

Contact Details (Email & Phone): _____

2. DETAILS OF THE CONCERN / INCIDENT

Date and Time of Incident/Observation: _____

Location / Venue of Event (City, Country, Specific Venue): _____

Name(s) of Child(ren) or Participant(s) affected: _____

Age / Date of Birth (if known): _____ Gender: _____

Name(s) of Parent(s) or Legal Guardian(s) (if known): _____

Contact Details of Parent(s) / Guardian(s): _____

3. PERSON(S) SUBJECT OF CONCERN (if applicable)

Name(s) of Person(s) causing concern: _____

Role / Relationship to CGE (Staff, Volunteer, Trainer, Partner, Other Participant): _____

4. FACTUAL DESCRIPTION OF THE INCIDENT / CONCERN

(Please describe clearly and factually what was witnessed, disclosed, or suspected. Include what was said using exact words where possible. Do not conduct personal investigations or speculate.)

5. IMMEDIATE ACTIONS TAKEN

- Immediate safety/medical care provided? ☐ YES ☐ NO

- Details of action taken:

- Were external emergency services contacted?

☐ Police (110) ☐ Emergency / Medical (112) ☐ Youth Welfare (Jugendamt)

Date/Time contacted: _____ Reference / Officer Name:

- Witness Names and Contacts (if any): _____

6. SIGNATURE & SAFEGUARDING FOLLOW-UP

Signature of Person Reporting: _____ Date: _____

--- (TO BE COMPLETED BY THE CGE SAFEGUARDING TEAM) ---

Date Received by Safeguarding Team: _____

Handled by: ☐ Mariana Matoso ☐ Moritz Borchardt

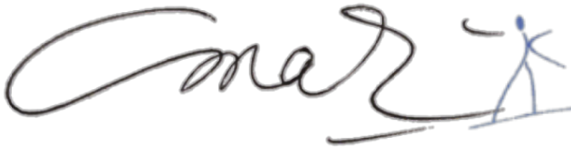
Immediate Protective Measures Ordered:

Case Reference & Status:

Signature of Safeguarding Lead: _____ Date: _____

On behalf of CGE e.V.,

Erfurt 22.10.2026

 **CULTURE GOES EUROPE**
SOZIOKULTURELLE INITIATIVE ERFURT E.V.
Salinenstraße 34, 99086 Erfurt - Germany info@cge-erfurt.org

Dr. Ammalia Podlaszewska

Chairwoman of Culture Goes Europe (CGE) e.V.