

EU CSA Legislation Advocacy Group (ECLAG)
Safeguarding Policy
September 2025

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Introduction to the policy

The CSA Legislation Advocacy Group (ECLAG) is a coalition of more than 60 international and European child rights NGOs striving to protect children from sexual abuse and exploitation. This collaborative EU-based advocacy group was established following the 2022 proposal by the European Commission for new legislation on the detection, removal and reporting of child sexual exploitation and abuse material (CSAM). ECLAG aims to optimize collective action by the child rights community and its key allies to ensure that the EU adopts robust legislative and non-legislative frameworks that end child sexual abuse and exploitation.

Our objectives are to:

- provide a framework for its members to share knowledge, ideas and materials related either directly or indirectly to the upcoming CSA legislative proposals;
- offer a trusted space for debate, learning and message development on the topics of technology policy and child rights;
- act as a focal point for joint advocacy and lobbying, including by members adopting and amplifying existing campaign materials by one or more of the group.

ECLAG does not work directly with children or with adult survivors of CSA, however both groups may take part in ECLAG activities or events. This Safeguarding Policy sets out standards for appropriate and non-appropriate behavior when engaging with children and adult survivors during ECLAG activities, and provides guidance on ECLAG's decision making processes when responding to potential concerns or incidents.

Scope of the policy

Representatives of the organizations forming the Steering Group are bound to this policy while taking part in ECLAG activities.

Members of the Participating Group are bound to their own Safeguarding Policies and hold the responsibility for safeguarding the children and adult survivors they work with during ECLAG activities or events. This includes obtaining informed consent for participation, completing risk assessments, and ensuring background checks of their relevant staff.

Third parties participating in ECLAG's work under different capacities, such as consultants, journalists, photographers, and donors, will be required to sign a Statement of Commitment to ECLAG's Code of Conduct when taking part in activities coordinated by ECLAG.

Storing data

ECLAG does not store any sensitive data pertaining to children or adult survivors of CSA. Organizations working directly with both groups are expected to ensure compliance with GDPR for any data they store for the purpose of an activity or event coordinated by ECLAG.

In some cases, ECLAG reserves the right to share information they do have about children or adult survivors if a safeguarding concern arises, if they are legally obliged to (i.e. as part of an investigation by law enforcement), or if deemed as necessary (i.e. in case of suspected harm to anybody). In these

instances, ECLAG will share information only on a need-to-know-basis and make sure relevant persons are informed (i.e. children's primary parent/ legal guardian).

Key principles

Principle 1: Protecting children from all forms of violence is a duty that extends to everybody and is non-negotiable.

Principle 2: ECLAG adopts a zero-tolerance policy towards violence, abuse, exploitation, and neglect. All the behaviors above will result in criminal, civil and/or disciplinary actions.

Principle 3: Every person is treated with dignity and as a unique subject.

Principle 4: The right to be protected from harm belongs to everybody, irrespective of sex, race, ethnicity, gender, socio-economic background, religion, disability and other intersectional factors.

Principle 5: ECLAG commits to uphold the rights of the child and to make the best interest of the child a primary consideration in all actions taken.

Principle 6: ECLAG commits to prevent, prohibit, and address unequal power dynamics, and recognizes that intersecting factors such as age, gender, disability, sexual orientation, religion, socio-economic status and more, can make some children and adults more vulnerable and increase power imbalances.

Principle 7: Any suspicions, allegations, or known incidents of harm will be taken seriously and responded to in a timely manner.

Definitions ¹

Child: any person below the age of 18 years old (UN Convention on the Rights of the Child, 1989), regardless of national legislation.

Child Safeguarding: Preemptive actions aimed at mitigating potential harm to children resulting from the activities conducted by an organization, including its staff, interns, consultants, and volunteers, both directly and indirectly. These risks may include physical violence, sexual violence, exploitation or abuse, emotional and verbal abuse, economic exploitation, failure to provide for physical, emotional or psychological needs, harmful cultural practices and privacy violations.

Direct contact: Being in the physical presence of children, including in the online sphere. For example, through a Zoom meeting.

Indirect contact: Having access to information about a child, and/or working on activities and projects that directly impact them.

Child sexual exploitation: A form of sexual abuse that involves children being engaged in any sexual activity in exchange for money, gifts, food, accommodation, affection, status, or anything else that they or their family needs. It usually involves a child being manipulated or coerced, which may involve befriending children, gaining their trust, and subjecting them to drugs and alcohol. The abusive relationship between victim and perpetrator involves an imbalance of power where the victim's

¹ Definitions taken from Missing Children Europe's Children and Vulnerable Adults Safeguarding Policy; ECPAT International Secretariat Child Safeguarding Policy; ECPAT Prevention of Sexual Exploitation, Abuse and Sexual Harassment, & Eurochild Child Protection Policy.

options are limited. It is a form of abuse that can be misunderstood by children and adults as consensual.

Child Sexual Abuse Material (CSAM): Means any representation, by whatever means, of a child engaged in real or simulated explicit sexual activities or any representation of the sexual parts of a child for primarily sexual purposes. This can include photographs, negatives, slides, magazines, books, drawings, movies, videos and images on online devices.

Sexual abuse: Refers to any non-consensual involvement of a child in sexual activities that are inappropriate for their age, developmental stage and understanding. It is also often referred to as the sexual exploitation of children, which entails any non-consensual or coercive use of minors for sexual purposes. What distinguishes the concept of child sexual exploitation from other forms of child sexual abuse is the underlying notion of exchange present in exploitation.

Sexual harassment: refers to prohibited conduct in the work context and can be committed against staff and related personnel. In the context of ECPAT International, sexual harassment primarily describes prohibited behavior against another staff member or related personnel, which may include people working with other NGOs or other partners. It involves any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another, when such conduct interferes with work, is made a condition of employment, or creates an intimidating, hostile, or offensive work environment.

Violence: Was defined by the UN Secretary General's Study on Violence as 'physical, psychological (psychosocial), and sexual violence to children through abuse, neglect or exploitation, as acts of commission or omission in direct or indirect forms, that endanger or harm the child's dignity, physical, psychological, or social status, or development.' Structural violence, which is built into the structure of society and manifests itself as unequal power, indirectly causes harm through a steady process of political, economic, or social discrimination, ultimately reducing a child's potential to fulfill their rights. Poverty is both a major risk factor for direct forms of violence against children, and a pervasive form of indirect violence in and of itself

Emotional abuse: Persistent emotional maltreatment that impacts on a child's emotional development. It may involve conveying to children that they are worthless and unloved, inadequate, or valued only so far as they meet the needs of another person. It may involve age or developmentally inappropriate expectations being imposed on children. It may involve causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of ill-treatment of a child, though it may occur alone.

Neglect: Is defined as the persistent failure to meet the child's basic physical and/ or psychological needs, likely to result in the serious impairment of the child's physical or cognitive development.

Physical abuse: Actual or potential physical harm perpetrated by another person, adult, or child. It may involve hitting, shaking, poisoning, drowning, and burning. Physical harm may also be caused when a parent or carer fabricates the symptoms of or deliberately induces illness in a child.

Commercial exploitation: Comprises sexual abuse by the adult and remuneration in cash or kind to the child or a third person or persons. The child is treated as sexual object and as a commercial object. The commercial sexual exploitation of children constitutes a form of coercion and violence against children and amounts to forced labour and a contemporary form of slavery.

The Policy

Recruitment

At the time of joining ECLAG's Steering Group, organizations will be expected to read this Safeguarding Policy and to sign a statement of commitment to its Code of Conduct.

Code of Conduct

The Code of Conduct ensures that the highest standards of behavior are adopted by all adults during any ECLAG activity or event. Members of the Participating Group as well as third parties participating under different capacities, such as consultants, journalists, photographers, and donors, will be required to sign a Statement of Commitment to the policy's Code of Conduct when taking part in activities where children or adult survivors are present. In case of a breach of the Code of Conduct, ECLAG reserves the right to issue a warning, suspend, or terminate any working involvement with the person at hand. The Code of Conduct can be found under Annex 1 of this policy.

Use of social media, photography and video

Consent for children and adult survivors to be photographed or to appear in videos is the responsibility of organizations working directly with them.

The Steering Group will be responsible for ensuring that any type of media shared publicly of an ECLAG event or activity by their own organization adheres to the following principles:

- The dignity of children and adult survivors will always be preserved.
- Any language used will not shame, victimize, discriminate, sensationalize, falsely represent or stereotype.
- Media will not be manipulated in any way.
- Media of children or adult survivors will not be used for personal purposes or shared with third parties.
- No child or adult will be purposely left out of a video or photograph because of their gender, age, ability, ethnic group or any other intersectional characteristic. ECLAG and all its members and contractors will be committed to represent a broad range of persons in its publications, videos, photographs and social media.
- ECLAG's logo will be present in any public media where children or adult survivors are present.
- Any images or videos depicting children or adults which are deemed as inappropriate will be immediately removed.

Implementing the policy

Organizations of ECLAG's Steering Group will each identify a Safeguarding Representative from their organizations to support the implementation of this policy.

Reporting a safeguarding concern or incident

Reports of a safeguarding concern or incident should be raised directly with the organizations who hold the responsibility for any child or adult survivor. Each organization will be required to follow the internal reporting procedures of their own policies.

If a safeguarding concern or incident is raised with a representative of ECLAG's Steering Group, they will pass this information on to the relevant organization working with the child/adult survivor and to the Safeguarding Representatives of each Steering Group member.

Managing a concern or incident

In cases where it is determined that a safeguarding concern or incident requires ECLAG's involvement, the Safeguarding Representatives of each Steering Group member will come together to evaluate the situation and determine which member from the SG will take the lead on the investigation. Once this has been decided, the selected member will follow the internal safeguarding protocols of their organization's Safeguarding Policy.

They will also be responsible for ensuring that a recording of the concern or incident is kept, detailing who was responsible for managing it and what actions were taken.

Professional judgment and common sense must always be applied. This means that if a child has been harmed or if there is an immediate risk to anybody, ECLAG reserves the right to contact law enforcement or any emergency service before contacting the organization responsible. Situations where this may arise include:

- If a child is in danger or has been subjected to harm.
- In situations that threaten the immediate safety of anybody involved.
- In case of an emergency outside of normal working hours.

Confidentiality

While managing a safeguarding concern or incident, ECLAG will only share information on a need-to-know basis. In some cases, information may be passed on without prior notice or consent, for instance:

- If there is a suspected or known risk of harm to a child or other person(s);
- there is an emergency or a life-threatening situation;
- a serious crime can be prevented or has been committed;
- members or third parties acting under any capacity for ECLAG are implicated.

Allegations towards a member representative of ECLAG's Steering Group or a member representative of ECLAG's Participating Group

If an allegation or a concern is raised towards a member representative of the Steering Group or Participation Group, the incident will be managed by the organization staffing the person(s) involved. ECLAG reserves the right to suspend any representatives of the Steering Group for the length of the investigation and until a final decision is made.

Implementation of ECLAG's Safeguarding Policy

ECLAG's Steering Group will review the policy on a yearly basis and evaluate its implementation through a Self-Assessment tool. The tool will support organizations of the Steering Group to assess their compliance with ECLAG's Safeguarding Policy and improve on their safeguarding implementation.

Resources

Safeguarding:

<https://www.anncrafttrust.org/resources/>

<https://learning.nspcc.org.uk/safeguarding-child-protection>

Digital Youth Work Guide

<https://www.anncrafttrust.org/wp-content/uploads/2020/06/Digital-Youth-Work-Guide.pdf>

<https://youthworksupport.co.uk/wp-content/uploads/2020/03/Online-Guidelines-1.pdf>