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Safeguarding, Health and Safety, and Participant Protection Framework

This document sets out EUPA's approach to safeguarding, participant protection, health and safety within Erasmus+, the European Solidarity Corps and other activities under its remit.

16 June 2026

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Introduction

In order to respond swiftly to emergencies, in particular threats and incidents affecting the health and safety of programme participants, the National Agency should make every effort to have a safeguarding policy and an emergency contact point and display it prominently on the National Agency website, preferably together with contact details of the relevant authorities who are the first responders to emergencies.

Commitment

EUPA is committed to ensuring the safety, wellbeing, dignity and protection of all individuals participating in activities supported through Erasmus+, the European Solidarity Corps and other initiatives falling within its remit.

This Safeguarding Policy has been developed in line with the principles and requirements established by the Erasmus+ and European Solidarity Corps Programme Guides, relevant European Union and Maltese legislation, and guidance issued by the European Commission concerning participant health, safety and protection. In particular, the policy draws upon the Commission's guidance on health and safety considerations in decentralised funds management, as well as related recommendations concerning safeguarding, risk management, emergency preparedness, participant protection and incident response.

The policy further supports EUPA's commitment to maintaining appropriate safeguarding and emergency response mechanisms, including the designation of emergency contact points, participant information measures, procedures for managing serious incidents, and arrangements to ensure that participants receive appropriate support before, during and after programme activities.

This policy reflects EUPA's commitment to providing a safe, inclusive and supportive environment for participants, staff, volunteers and partner organisations. It establishes a framework for preventing harm, responding effectively to concerns and incidents, promoting accountability, and ensuring that appropriate safeguarding measures are

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integrated throughout the planning, implementation, monitoring and evaluation of activities.

This policy should be read in conjunction with EUPA's operational procedures relating to safeguarding, health and safety, risk management and incident response, as well as any additional requirements established by the European Commission, the Erasmus+ Programme Guide and the European Solidarity Corps Programme Guide.

Section I – EUPA Staff Safeguarding Policy for Erasmus+ and European Solidarity Corps

1. Purpose

The purpose of this Safeguarding Policy is to affirm EUPA's commitment to safeguarding and promoting the welfare, dignity and rights of children, young people, and vulnerable adults. The organisation adopts a zero-tolerance approach to all forms of abuse, neglect, exploitation, harassment and discrimination, including sexual exploitation, abuse and harassment (PSEAH).

2. Scope

This policy applies to:

- All EUPA staff, board members, consultants and temporary/visiting staff
- Partner organisations and service providers
- All activities, including Erasmus+, ESC and national initiatives

3. Legal and Regulatory Framework

This policy is informed by relevant Maltese and European legislation, including:

- Erasmus+ Programme Guide (latest version)
- Child Protection (Alternative Care) Act (Cap. 602)
- Criminal Code (Cap. 9)
- Data Protection Act (Cap. 586) and GDPR (EU) 2016/679

4. Definitions

- Child/Minor: Any person under 18 years of age
- Adult at Risk: Any adult who may be unable to protect themselves due to vulnerability

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- Safeguarding: Measures to protect individuals from harm, abuse or exploitation

5. Principles

EUPA commits to:

- Non-discrimination and equality of treatment
- Inclusion and accessibility for all individuals
- Protection from harm, abuse and violence
- Respect for diversity and individual differences
- Ensuring quality, accountability and reliability in all activities
- A zero-tolerance approach to sexual exploitation, abuse and harassment (PSEAH)

6. Safeguarding System Approach

Safeguarding is a shared responsibility across all actors involved, including EUPA, partner organisations, staff, volunteers and participants.

Safeguarding within EUPA is implemented as a continuous and integrated system covering:

- Prevention (before and during activities)
- Protection (safe environments and supervision)
- Response (reporting and case management)
- Review (monitoring and improvement)

7. Roles and Responsibilities

- A Designated Safeguarding Officer (DSO) shall be appointed within the EUPA. The DSO is the primary contact person in emergency situations affecting participant health, safety or wellbeing.
- The DSO is responsible for:
 - receiving and managing safeguarding concerns
 - liaising with authorities
 - ensuring policy implementation
- All staff must:
 - adhere to this policy
 - report concerns immediately



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8. Safer Recruitment and Vetting

EUPA shall:

- Apply safe recruitment procedures
- Conduct background checks and request Police Conduct Certificates where required
- Ensure references are verified

9. Training and Awareness

- All personnel must receive safeguarding training
- Refresher training shall be provided regularly
- Staff must be aware of reporting procedures

10. Code of Conduct

All personnel must:

- Maintain professional boundaries
- Avoid inappropriate relationships with minors or vulnerable individuals
- Refrain from any form of harassment, exploitation or discrimination
- Avoid situations that may place themselves or others at risk
- Use appropriate communication (including digital communication)

11. Reporting and Case Management

Serious incidents affecting participant health, safety or wellbeing shall be communicated without delay to the relevant National Agency and, where required, to the European Commission in accordance with programme requirements.

- All safeguarding concerns must be reported to the DSO immediately
- Concerns shall be documented accurately
- Serious cases shall be referred to:

Police

Child Protection Services

Safeguarding Commission (where applicable)

EUPA follows a structured process for handling safeguarding concerns:

- Concern is received or identified
- Immediate safety of the individual is ensured



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- Report is submitted to the Designated Safeguarding Officer (DSO)
- Incident is documented accurately
- Risk assessment is conducted
- Referral to appropriate authorities where necessary
- Follow-up actions and communication with relevant parties
- Review and learning

12. Crisis and Incident Management (SOS system)

EUPA maintains a structured approach to managing serious safeguarding incidents and crises.

This includes:

- Clear escalation procedures and decision-making responsibilities
- Designated contact persons for crisis situations
- Coordination with partner organisations and relevant authorities
- Clear internal and external communication lines
- Documentation and review of all incidents

Safeguarding response is timely, coordinated and proportionate to the level of risk.

13. Risk Assessment

- Safeguarding risks must be assessed for all activities
- Mitigation measures must be implemented and monitored

14. Confidentiality and Data Protection

- Information shall be handled in accordance with GDPR and Maltese law
- Information shall only be shared on a need-to-know basis

15. Monitoring

- This policy shall be reviewed annually
- The DSO shall report on safeguarding matters to management
- EUPA shall maintain publicly accessible information on safeguarding, participant safety, emergency contacts and reporting mechanisms on its website.



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Section II - Participant Protection and Safeguarding Policy for Erasmus+ and European Solidarity Corps Activities

1. Purpose

This policy outlines EUPA's commitment to ensuring the safety, wellbeing and protection of all participants involved in Erasmus+ and European Solidarity Corps activities, particularly during mobility and international activities.

This policy shall be read in conjunction with the EUPA Safeguarding Policy Section I.

2. Scope

This policy applies to:

- All participants (including minors and adults at risk)
- Group leaders, trainers, mentors and accompanying persons
- Sending and host organisations
- Activities conducted in Malta and abroad

3. Principles

Safeguarding is a shared responsibility between the sending organisation, host organisation, group leaders and participants, each playing a role in ensuring a safe environment.

EUPA monitors that beneficiaries:

- Ensure safe and inclusive participation
- Promotes dignity, respect and equality
- Apply a zero-tolerance approach to abuse and PSEAH
- Ensure rapid and appropriate response to concerns

4. Roles and Responsibilities

- A Designated Safeguarding Officer (DSO) within the partnership in approved projects shall oversee safeguarding during Erasmus+ and European Solidarity Corps activities.
- Group leaders and accompanying persons are responsible for:



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- participant supervision
- immediate response to concerns
- Partner organisations must comply with safeguarding standards

5. Risk Assessment and Duty of Care

- Risk assessments must be conducted for all activities by partners within an approved project.
- Risks related to:
 - travel
 - accommodation
 - safeguardingmust be identified and mitigated

EUPA shall ensure that safeguarding is integrated into approved projects:

- Project planning and design
- Selection and preparation of participants
- Assessment of partner organisations' safeguarding capacity
- Pre-departure briefings and participant awareness

6. Participant Protection Measures

EUPA shall monitor the beneficiaries' provision of:

- Safe accommodation and environments
- Adequate supervision of participants
- Clear communication of rules and expectations
- Access to support during activities

7. Code of Conduct

All participants and staff involved in approved projects must:

- Treat others with respect and dignity
- Refrain from any form of harassment, abuse or discrimination
- Avoid inappropriate relationships or behaviour
- Follow instructions from leaders
- Respect cultural differences



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8. Insurance and Health

Beneficiary organisation are expected to make sure that participants involved in Erasmus+ and European Solidarity Corps activities are informed of the insurance requirements applicable to their participation and, where required by the relevant Programme Guide, shall be covered by appropriate insurance arrangements.

- Insurance coverage should include, as applicable: Travel insurance; including loss or damage to luggage;
- Medical and health insurance;
- Accident and serious illness coverage, including temporary or permanent incapacity;
- Third-party liability insurance;
- Death and repatriation coverage;
- Any additional insurance required by a specific action or activity.

Participants taking part in transnational activities are strongly encouraged to obtain and carry a valid European Health Insurance Card (EHIC), where applicable, to facilitate access to medically necessary healthcare during their stay abroad. Participants shall be informed, prior to departure, of:

- the insurance arrangements applicable to the activity;
- any limitations or exclusions in coverage;
- procedures for seeking medical assistance;
- emergency contact procedures and available support mechanisms.

Where activities involve minors, adults at risk, volunteering activities, traineeships or other activities subject to specific programme requirements, beneficiary organisations shall ensure compliance with the insurance provisions established in the relevant Erasmus+ or European Solidarity Corps Programme Guide.

9. Parental/Guardian Consent

- Written consent is required for all participants under 18
- Parents/guardians must be informed of risks and arrangements

10. Reporting Safeguarding Concerns

All concerns must be reported immediately.



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Participants may:

- Contact emergency services
- Report to group leaders or the DSO within the project partners
- Contact the DSO at the National Agency
- Contact the Maltese Embassy/Consulate (abroad)
- Report suspected criminal acts to the local police and request documentation

Serious cases may be referred to authorities.

Participants may also report concerns confidentially and anonymously where possible.

11. Protection Against Retaliation

Beneficiaries need to assure that:

- Individuals reporting concerns in good faith shall not face retaliation
- Any victimisation will result in disciplinary action

12. Data Protection and Confidentiality

Beneficiaries need to assure that:

- Information shall be stored securely
- Shared only when necessary for safety

13. Emergency Contact Point

Beneficiary organisations shall designate an Emergency Contact Point for participant health, safety and safeguarding matters. Unless otherwise designated by the partners involved in an approved project, the Designated Safeguarding Officer shall act as the Emergency Contact Point.

The contact details shall be communicated to participants before the start of activities.

The Emergency Contact Point shall:

- receive emergency notifications;
- coordinate with partner organisations and authorities;
- support participants and their families;

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- coordinate follow-up and communication with participants, families, partner organisations and relevant authorities until the incident is resolved
- maintain records of serious incidents and actions taken.

14. Emergency Procedures

Participants shall receive emergency contact information before departure, including:

- The partnership's DSO contact details;
- EUPA DSO contact details;
- the European emergency number 112;
- relevant local emergency services;
- embassy or consular contact details where applicable.

Procedures shall be in place to ensure timely communication with participants, families, partner organisations and relevant authorities during emergencies or serious incidents.

Clear procedures must exist between project partners for:

- medical emergencies
- safeguarding incidents
- repatriation

15. Monitoring and Review

Following publication of the updated safeguarding and emergency contact information on EUPA's website, EUPA shall issue a circular to all current Erasmus+ and European Solidarity Corps beneficiaries explaining the reporting routes and directing them to the published contact directory. The directory shall be checked periodically and whenever contact details change.

- Feedback from participants shall inform improvements for necessary action to be followed by beneficiaries in successive implementation of projects.



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Annex 1

Resources for Beneficiaries of the Erasmus+ and European Solidarity Corps

Mobility Safeguarding Checklist

Before Mobility

- Verify partner safeguarding measures
- Conduct risk assessment (country-specific)
- Confirm insurance coverage
- Assign safeguarding contact (DSO)
- Collect parental consent (if minors)

During Mobility

- Ensure supervision of participants
- Daily informal check-ins
- Clear communication channels available

Emergency Preparedness

- Emergency contacts shared
- Embassy details provided
- Incident escalation plan in place
- EUPA Emergency Contact Point/DSO communicated to participants
- Participants informed of emergency reporting procedures
- Local emergency numbers verified

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Participant Safeguarding Briefing

Key Principles

Respect, dignity, zero tolerance to abuse

Follow Code of Conduct

If You Feel Unsafe

Contact leader or DSO designated within the project partners

Contact Emergency Contact Point /DSO at EUPA

Call emergency services

Contact embassy if abroad

Important Contacts

For immediate emergencies in Malta: 112. For safeguarding and welfare support: Supportline 179 (24/7). See the Maltese Safeguarding and Support Contacts directory below. EUPA contacts must be confirmed before publication.

European Emergency Number: 112

EUPA Emergency Contact Point

Designated Safeguarding Officer

Host Organisation Emergency Contact

Local Police

Local Medical Services

Embassy/Consulate (where applicable)

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Safeguarding Incident Report Form

Basic Information

Date:

Location:

Person reporting:

Details of Incident

Describe what happened:

Who was involved:

Actions Taken

Immediate response:

Who was informed:

Follow-up

Next steps:

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Partner Safeguarding Compliance Checklist

Partner Information

Organisation Name:

Country:

Safeguarding Contact Person:

Policy and Procedures

Does the partner have a safeguarding policy?

Does the partner have a designated safeguarding officer?

Does the partner have emergency response procedures?

Is an emergency contact person available during activities?

Are participants informed of necessary emergency services?

Risk and Environment

Is accommodation safe?

Are supervision arrangements adequate?

Are local risks identified?

Agreement

Partner agrees to comply with safeguarding standards:

Signature:

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Mobility Safeguarding Risk Assessment Template

Activity Details

Project Name:

Location:

Dates:

Risk Identification

Travel risks:

Accommodation risks:

Safeguarding risks:

Mitigation Measures

Preventive actions:

Supervision arrangements:

Emergency Planning

Emergency contacts:

Evacuation/repatriation plan:

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EUPA Health, Safety and Serious Incident Response Procedure

Introduction

EUPA is committed to ensuring that all participants in Erasmus+, the European Solidarity Corps and other activities under its remit can participate in a safe, secure and supportive environment. While every effort is made to prevent incidents through effective safeguarding, risk management and participant preparation, situations may arise that require a coordinated response to protect the health, safety and wellbeing of participants.

This Health, Safety and Serious Incident Response Procedure establish the operational arrangements to be followed by EUPA staff when responding to emergencies, safeguarding concerns and serious incidents affecting participants. It provides a framework for timely decision-making, communication, coordination and reporting, ensuring that incidents are managed consistently, effectively and in accordance with applicable programme requirements.

The procedure has been developed in line with the Erasmus+ and European Solidarity Corps Programme Guides, the European Commission's guidance on health and safety considerations in decentralised funds management, EUPA's Safeguarding Policy, and other relevant national and European requirements.

The procedure complements EUPA's Safeguarding Policy by translating safeguarding and participant protection commitments into practical actions and responsibilities. It aims to ensure that participants receive appropriate support, that relevant stakeholders are informed in a timely manner, and that lessons learned from incidents contribute to the continuous improvement of EUPA's health, safety and safeguarding practices.

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1. Purpose

This procedure establishes the actions to be taken by EUPA staff when a serious incident affecting the health, safety or wellbeing of participants in Erasmus+ or European Solidarity Corps activities is reported.

2. Scope

This procedure applies to all Erasmus+ and European Solidarity Corps activities managed by EUPA and covers incidents occurring in Malta or abroad.

3. Examples of Serious Incidents

Serious incidents may include:

- death of a participant;
- serious accident or injury requiring hospitalisation;
- disappearance or missing participant;
- assault or violent incident;
- serious safeguarding concern;
- serious illness;
- natural disaster, political unrest or security threat affecting participants;
- any situation requiring emergency intervention or repatriation.

4. Immediate Response

Upon receiving information about a serious incident, the Designated Safeguarding Officer (DSO) or Emergency Contact Point shall:

- establish the basic facts of the incident;
- determine whether emergency services have been contacted;
- confirm the immediate safety of participants;
- identify whether medical assistance is required;
- record the date, time and source of the information received.

5. Initial Information Gathering

The following information should be collected where available:

- participant name;
- project number and activity type;
- location of incident;



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- date and time of incident;
- description of incident;
- current condition of participant;
- organisations involved;
- actions already taken.

6. Communication and Coordination

Where an incident occurs in Malta, the Emergency Contact Point shall use the Maltese Safeguarding and Support Contacts directory, selecting the appropriate emergency responder, statutory protection service or specialist support organisation. Referral to the Safeguarding Commission is appropriate primarily for Church-related safeguarding matters or where its advisory services are relevant; it is not a substitute for statutory child protection or Police reporting.

The Emergency Contact Point shall:

- maintain communication with the sending and hosting organisations;
- maintain contact with the participant or accompanying persons where possible;
- liaise with relevant authorities and emergency services as required;
- support communication with family members or guardians where appropriate.

7. Notification of the National Coordinator

The National Coordinator and relevant management staff shall be informed without delay of any serious incident.

8. Notification of the European Commission

Where required under Erasmus+ or European Solidarity Corps procedures, EUPA shall notify the European Commission and the relevant desk officer without delay.

9. Follow-up

EUPA shall:

- monitor developments until the situation is resolved;
- maintain a written record of actions taken;
- coordinate any required support measures;
- ensure lessons learned are identified.

10. Post-Incident Review

Following closure of the incident, EUPA shall conduct a review to identify:



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- effectiveness of the response;
- safeguarding implications;
- recommendations for future prevention;
- updates required to procedures, guidance or training.



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Annex III

EUPA incident report form

(For completion by the Designated Safeguarding Officer or authorised EUPA staff member)

A. REPORT DETAILS

Incident Reference Number: _____

Date Report Opened: _____

Time Report Opened: _____

Completed By: _____

Position: _____

Date of Report: _____

B. PARTICIPANT DETAILS

Reporting participant Name: _____

Date of Birth(if applicable): _____

Nationality: _____

Gender (optional): _____

E-mail Address: _____

Telephone Number: _____

Emergency Contact Name: _____

Emergency Contact Telephone Number: _____



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C. PROJECT DETAILS

Programme:

☐ Erasmus+

☐ European Solidarity Corps

Project Reference Number: _____

Project Title: _____

Sending Organisation: _____

Hosting Organisation: _____

Country of Activity: _____

Activity Dates: _____

D. INCIDENT DETAILS

Date of Incident: _____

Time of Incident: _____

Location of Incident: _____

Type of Incident (tick all applicable):

☐ Serious Accident

☐ Serious Illness

☐ Hospitalisation

☐ Safeguarding Concern

☐ Assault / Violence

☐ Missing Participant



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- ☐ Death
- ☐ Natural Disaster
- ☐ Security Incident
- ☐ Repatriation
- ☐ Other: _____

Detailed Description of Incident:

How was EUPA informed of the incident?

E. CURRENT STATUS OF PARTICIPANT/S INVOLVED

Current Situation:

- ☐ Safe and Well
- ☐ Receiving Medical Treatment
- ☐ Hospitalised
- ☐ Returned Home
- ☐ Missing
- ☐ Deceased
- ☐ Other

Details:

F. IMMEDIATE ACTIONS TAKEN

Emergency Services Contacted?

- ☐ Yes ☐ No



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Police Contacted?

☐ Yes ☐ No

Medical Assistance Provided?

☐ Yes ☐ No

Embassy/Consulate Contacted?

☐ Yes ☐ No

Participant's Family/Guardian Contacted?

☐ Yes ☐ No

Actions Taken:

G. COMMUNICATION AND NOTIFICATIONS

Organisation / Authority Contacted | Date | Time | Contact Person

Was the National Coordinator informed?

☐ Yes ☐ No

Date: _____

Was the European Commission informed (if required)?

☐ Yes ☐ No

Date: _____

H. RISK ASSESSMENT

Current Risk Level:

☐ Low

☐ Medium

☐ High

☐ Critical



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Reasoning:

Further Action Required:

I. FOLLOW-UP ACTIONS

Planned Actions:

Person Responsible:

Deadline:

J. INCIDENT CLOSURE

Date Closed: _____

Summary of Outcome:

Lessons Learned / Recommendations:

DSO Name: _____

Signature: _____

Date: _____



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Annex IV

Maltese Safeguarding and Support Contacts

Important

In situations involving immediate danger or threats to life, participants should contact 112 before contacting EUPA or any other support organisation.

For activities taking place outside Malta, beneficiaries must ensure that participants are provided with the emergency numbers, relevant safeguarding authorities, medical services and embassy or consular contacts applicable to the host country before departure. The Maltese contacts listed in this annex do not replace the competent authorities in the country where the activity takes place.

The organisations in the following table have different mandates; not all are emergency first responders.

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Organisation	Contact	Website	Relevant role
Commission for the Rights of Persons with Disability (CRPD)	+356 2226 7600	crpd.org.mt	Disability rights, complaints and advice.
Commission on Gender-Based Violence and Domestic Violence	+356 2276 8301	stopviolence.gov.mt	Policy and coordination; for urgent domestic violence concerns use 112 or 179.
Emergency Services / Malta Police Force	112 (24/7)	pulizija.gov.mt	Immediate danger, crime, urgent police, ambulance or fire response.
FSWS / Aġenzija Appoġġ	+356 2295 9000	fsws.gov.mt/appogg	Family support, domestic violence and social welfare services.
FSWS – Child Protection Directorate	+356 2149 2348	Child Protection Directorate	Child protection referrals and assessment.
FSWS – Supportline 179	179 (24/7)	Supportline 179	Safeguarding and welfare concerns; crisis support and referral.
Human Rights Directorate	+356 2226 3210	humanrights.gov.mt	Human rights and equality policy and information.
Identità – Expatriates Unit	+356 2590 4800	Identità	Residence documentation and permits for foreign nationals, including ESC volunteers. Not an emergency service.
Information and Data Protection Commissioner (IDPC)	+356 2328 7100	idpc.org.mt	Personal-data protection and complaints.

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Mental Health Helpline	1579 (24/7)	Mental Health Helpline	Emotional support, guidance and assistance for people experiencing psychological distress or mental health difficulties.
Ministry for Foreign and European Affairs – Consular Services	+356 2124 2191	Consular Assistance	Consular assistance for Maltese nationals experiencing emergencies abroad.
Office of the Commissioner for Children	+356 2148 5180	Commissioner for Children	Children's rights, advocacy and oversight; not an emergency service.
Safeguarding Commission (Archdiocese of Malta)	+356 2247 0950	safeguarding.mt	Church-related safeguarding and advisory support; not a statutory first responder.
Victim Support Agency (government)	116 006	victimsupportagency.com	Support, information and guidance for victims of crime.
Victim Support Malta (NGO)	+356 2122 8333	victimsupport.org.mt	Independent support to victims of crime and trauma.

EUPA Designated Safeguarding Officer (DSO)

Raphael Scerri

National Coordinator

Office: +356 25552340 | Mobile: 79000490 | E-mail: raphael.scerri@gov.mt

These contacts are for notification and coordination with EUPA.

For immediate danger or urgent medical, police or fire assistance in Malta, call 112.



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