European E-Learning Institute

Child Protection Policy

Safeguarding children in all EUEI training, projects and digital learning

Our commitment. The European E-Learning Institute (EUEI) has zero tolerance for the abuse, exploitation or neglect of children. Every child who takes part in our work has the right to be safe, respected and heard.

1 Policy statement

This policy sets out how EUEI prevents harm to children, recognises concerns and responds to them. It applies the Danish legal framework and the safeguarding expectations of the European Commission for Erasmus+, Horizon Europe and CERV funded work.

2 Scope and definitions

This policy applies to everyone who works with or on behalf of EUEI, in Denmark and abroad, online and in person.

- **Staff:** all employees, directors and managers, full or part time.
- **Associates:** freelancers, trainers, consultants, interns and volunteers.
- **Partners:** consortium members and subcontractors delivering EUEI-led activities, who must follow this policy or an equivalent of their own.
- **Visitors:** anyone attending an EUEI event or meeting where children are present.

Term	Meaning in this policy
Child	Anyone under 18, in line with the UN Convention on the Rights of the Child and Danish law.
Abuse	Physical, emotional or sexual harm, neglect, or exploitation, including online.
Safeguarding	The steps EUEI takes to prevent harm and to protect children's welfare.
Designated Safeguarding Lead (DSL)	The named person responsible for child protection at EUEI.
Concern	Any worry that a child is being harmed or is at risk of harm.

Adults at risk are not covered here, but staff should apply the same reporting steps where an adult learner may be at risk.

3 Guiding principles

EUEI's approach rests on six principles drawn from the UN Convention on the Rights of the Child (UNCRC).

1. **Best interests first.** The welfare of the child is the paramount consideration in every decision (UNCRC Article 3).
2. **Every child equally protected.** All children have the same right to protection, whatever their age, disability, gender, sexual orientation, ethnicity, religion, language or migration background.

3. **Children are heard.** Children have the right to express their views on matters that affect them, and those views are taken seriously (UNCRC Article 12).
4. **Prevention over reaction.** Safe recruitment, clear conduct rules and well designed activities stop most harm before it starts.
5. **Everyone's responsibility.** Every person covered by this policy must act on a concern. Nobody waits for certainty or for someone else.
6. **Working together.** EUEI cooperates fully with Danish municipalities, the police and partner organisations to protect children.

4 Legal framework

EUEI is registered in Denmark and follows Danish law wherever it works. Where a partner country sets a higher standard, EUEI meets that standard as well.

Instrument	What it requires of EUEI
UN Convention on the Rights of the Child	Protection from all forms of violence and abuse; the child's best interests and right to be heard. Ratified by Denmark in 1991.
Barnets lov (Children's Act), 2024	Section 133 sets a strengthened duty to report concerns to the child's municipality for staff in education and similar settings; Section 135 sets a general duty for every citizen. Failing to report is a criminal offence.
Børneattestloven (Children's Certificate Act)	EUEI must obtain a børneattest before employing or engaging anyone who will have direct, regular contact with children under 15.
Danish Criminal Code (Straffeloven)	Defines sexual and violent offences against children; the age of consent is 15.
GDPR and Databeskyttelsesloven	Personal data about children and safeguarding concerns must be processed lawfully, minimally and securely.
EU funding rules	Erasmus+, Horizon Europe and CERV beneficiaries must protect participants, including minors, and apply ethics and safeguarding procedures.

5 Roles and responsibilities

EUEI names one Designated Safeguarding Lead (DSL) and one deputy, so a trained person is always reachable.

Who	Responsibilities
Managing Director	Owns this policy, ensures resources for it and receives an annual safeguarding report.
Designated Safeguarding Lead	First point of contact for all concerns; decides on referrals to the municipality or police; keeps secure records; organises training; briefs partners.
Deputy DSL	Covers the DSL when absent and supports case handling.
Project managers	Build safeguarding into project design, risk assessments, partner agreements and event plans wherever children take part.
All staff and associates	Follow the code of conduct, complete training, and report every concern to the DSL the same day.
Partners	Apply this policy or an equivalent, name a local safeguarding contact, and inform EUEI of any incident involving an EUEI activity.

Anyone can raise a concern with the DSL through EUEI's general contact details on this website. Staff, associates and partners receive the direct contact details of the DSL and deputy at induction and at each project kick-off.

6 Safe recruitment

No one works directly with children for EUEI until the checks below are complete.

- **Børneattest:** obtained through the police digital service, with the person's written consent, before anyone starts a role with direct or regular contact with children under 15.
- **Wider checks:** EUEI also asks for a criminal record extract or equivalent for roles involving young people aged 15 to 17, and for associates based outside Denmark.
- **References:** at least two, one from a recent employer, with a direct question about suitability to work with children.
- **Interview:** includes a safeguarding question for every role that involves children.
- **Induction:** this policy is read and signed on the first day.
- **Renewal:** checks are repeated every three years, or sooner if a role changes.

7 Code of conduct

Everyone covered by this policy must keep professional boundaries with children at all times.

Always	Never
Treat every child with respect and dignity	Use physical punishment, humiliation or threats
Work in sight of other adults, or with doors open	Spend time alone with a child out of view, unless essential and agreed with the DSL
Use EUEI or project accounts to contact children	Contact a child on personal phones, email or social media
Get parental or guardian consent before photographing or filming a child	Share images of a child without consent, or that identify where they live or study
Keep language and physical contact appropriate to the child's age	Make sexual comments, jokes or advances, however mild
Report any concern to the DSL the same day	Promise a child to keep a secret, or try to investigate yourself
Follow project rules on gifts, travel and hospitality	Supply alcohol, tobacco or drugs to a child, or work under their influence

A breach of this code may lead to disciplinary action, ending a contract, and referral to the authorities.

8 Online safety and digital learning

As an e-learning organisation, EUEI applies the same standards online as in person.

- **Platforms:** learning platforms and community spaces used by children are moderated, have reporting buttons, and do not allow private messaging between adults and children.
- **Live sessions:** at least two EUEI adults are present; links are not shared publicly; recordings are made only with consent and stored securely.
- **Content:** courses, games, videos and open educational resources are reviewed for age suitability, inclusion and accessibility before release.
- **Data:** only the data needed is collected; parental consent is required for children under 13 using online services, in line with Danish data protection law.
- **Social media:** children are tagged or named only with written consent; no location details are published.
- **Online harm:** grooming, cyberbullying, sextortion or sharing of intimate images is reported to the DSL at once and, where criminal, to the police.

9 Projects, events and mobilities

Every EUEI led activity involving children has a written safeguarding plan before it starts.

- **Risk assessment:** covers venue, supervision, transport, accommodation, online elements and the specific needs of participating children.
- **Consent:** signed parental or guardian consent for participation, photography, medical needs and emergency contacts.
- **Supervision ratios:** agreed with partners and suited to the children's age and needs; never fewer than two adults.
- **Accommodation:** children never share rooms with adults who are not their parent or guardian.
- **Partner agreements:** consortium and subcontract agreements include a safeguarding clause, a named local contact, and a duty to report incidents to EUEI within 24 hours.
- **Abroad:** concerns are reported to local authorities under local law and to EUEI's DSL in parallel.

10 Recognising and responding to concerns

You do not need proof to raise a concern. A reason to believe a child may be at risk is enough.

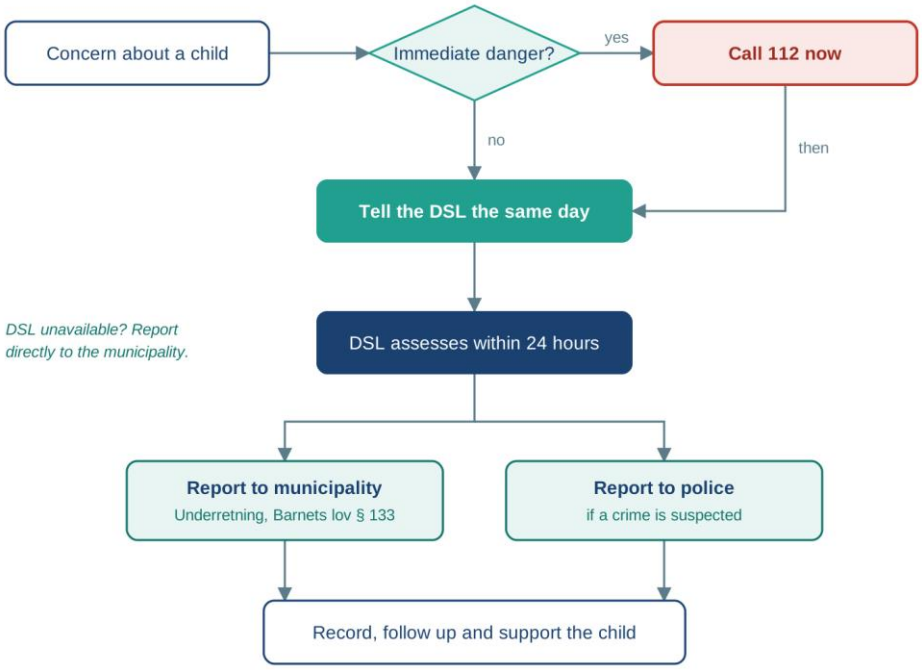
Possible signs include unexplained injuries, sudden changes in behaviour or mood, withdrawal, fear of a particular person, age inappropriate sexual knowledge, poor hygiene or hunger, secretive online contact, or a child telling you something directly.

If a child tells you something:

1. Stay calm and listen. Let the child speak in their own words.
2. Reassure them they were right to tell you and that it is not their fault.
3. Do not ask leading questions or investigate.
4. Explain honestly that you must share it with someone who can help. Never promise secrecy.
5. Write down what was said, in the child's words, with the date, time and who was present, as soon as possible.
6. Report to the DSL the same day.

11 Reporting procedure

> **The duty to report is personal.** Telling the DSL does not remove your own legal duty if the DSL does not act.



The municipality must confirm receipt of a report within six working days and assess within 24 hours whether the child is in danger. EUEI cooperates with any follow up it requests.

12 Confidentiality and records

Safeguarding information is shared only with those who need it to protect the child.

- Records are factual, signed and dated, and kept in a restricted file accessible only to the DSL, deputy and Managing Director.
- Processing follows the GDPR and Databeskyttelsesloven; the legal basis is the protection of the child's vital interests and EUEI's legal duty to report.
- Records are kept for as long as Danish law and the purpose require, then securely deleted.
- Staff who report a concern in good faith are protected from any detriment, in line with EUEI's whistleblowing arrangements.
- Concerns about the DSL or the Managing Director are reported directly to the other, or to the municipality.

13 Training, review and contacts

All staff complete safeguarding training at induction and a refresher every two years; the DSL and deputy complete advanced training. Partners receive a briefing at each project kick-off where children take part.

This policy is reviewed every year, and after any serious incident or change in law.

Contact	Details
Emergency (police, ambulance)	**112**
Police, non-emergency	**114**
Child's home municipality	Underretning via the municipality's website
BørneTelefonen (Børns Vilkår), for children	**116 111**
EUEI Designated Safeguarding Lead	Via EUEI's general contact details