EU Children's Participation Platform

Anti-harassment, Anti-intimidation and anti-bullying guide

February 2025

Introduction: A Safe, Inclusive, and Respectful Environment

The EU Children's Participation Platform (hereafter, the Platform) is committed to creating a safe and inclusive environment where no child, staff member, Platform representative, or stakeholder is subjected to harassment, intimidation, discrimination, or bullying. The Platform has zero tolerance for any form of harassment, intimidation, bullying, discrimination, or abuse, whether verbal, physical, or digital.

The Anti-Harassment, Anti-Intimidation, and Anti-Bullying Guide reflects this commitment, ensuring that all individuals engaging with the Platform can work, participate, and collaborate without fear, harm, or mistreatment. The Platform is dedicated to preventing, identifying, and responding to any form of misconduct and will take immediate action when concerns arise.

All individuals engaging with the Platform—whether staff, member organisations, partners, or representatives—are strongly encouraged to report concerns if they witness, experience, or suspect harassment, bullying, or intimidation. Reports will be taken seriously, handled confidentially, and addressed promptly.

Retaliation against anyone who raises a concern or contributes to an investigation is strictly prohibited. Any form of victimisation, intimidation, or retaliation will be treated as a serious breach of the Safeguarding Framework, Code of Conduct, and Code of Behaviour. Such breaches may result in disciplinary action, removal from the Platform, and where necessary, reporting to relevant authorities.

Context on Addressing Harassment, Intimidation, and Bullying

Harassment, intimidation, and bullying are serious safeguarding concerns that can threaten the well-being of both children and adults engaging with the Platform. While all safeguarding risks are addressed within the Platform's broader Safeguarding Framework, it is important to distinguish how different types of misconduct are handled:

- Harassment, intimidation, and bullying between or towards adults (staff, Platform members, partners, suppliers, or other representatives) are addressed in this guide. This includes inappropriate conduct in workplace settings, online interactions, and Platform-related activities.
- Harassment, intimidation, and bullying towards children are addressed through the Safeguarding Framework. Any concerns related to children—including physical, emotional, or online bullying—must follow the Safeguarding Framework's reporting and response procedures.

This distinction ensures that concerns are addressed through the most appropriate policies and response mechanisms. Regardless of whether a concern involves a child or an adult, all individuals

engaging with the Platform must uphold the same high standards of behaviour to maintain a culture of respect, inclusion, and safety.

- For concerns involving children - Refer to the Safeguarding Framework.
- For concerns involving harassment, intimidation, or bullying among adults - Refer to this Anti-Harassment, Anti-Intimidation, and Anti-Bullying Guide.
- For concerns related to sexual harassment, exploitation, or abuse (including between adults) - Refer to the Protection from Sexual Exploitation and Abuse (PSEA) Guide.

Definitions

To support the guide with a set of comprehensive and exhaustive definitions, we have referenced below Save the Children's definitions relevant to the Anti-harassment, Anti-intimidation and anti-bullying guide[1].

- Harassment consists of unwanted conduct, whether verbal, physical or visual, which is related to a person's sex, gender, marital status, sexual orientation, race (including colour, nationality or ethnic or national origin), religion or belief, age or disability with the purpose or effect of violating the dignity of a person or creating an intimidating, hostile, degrading, humiliating or offensive environment. Such conduct may take place on a single occasion or on several occasions.
- Sexual Harassment consists of unwanted conduct of a sexual nature, which has the purpose or effect of violating the dignity of a person or creating an intimidating, hostile, degrading, humiliating or offensive environment. Such conduct may take place on a single occasion or on several occasions. Sexual Harassment may take the form of unwelcome physical, verbal or non-verbal conduct directed at a person or group of persons, which may include - but is not limited to - the following:
    - unwanted physical contact, ranging from touching to sexual assault and rape;
    - verbal forms of sexual harassment including unwelcome sexual innuendoes, suggestions and hints, sexual advances, comments with sexual overtones, sex-related jokes or insults, comments about a person's body or enquiries about a person's sex life or sexual orientation;
    - non-verbal forms of sexual harassment including unwelcome gestures, whistling, indecent exposure or the unwelcome display of sexually explicit pictures or objects;
    - unwanted messages of a sexual nature that are sent via email, SMS, Teams, voice messages and other electronic means, whether using the Platform's IT/devices or personal mobiles/equipment; or
    - harassment of a sexual nature that is linked to recruitment/employment opportunities, promotion, training or development opportunities or the offer of salary increments or other employee or worker benefits in exchange for sexual favours.
- Intimidation is the unreasonable use of status or authority to require or coerce an individual to perform an action or task, which the individual knows to be inappropriate and/or disrespectful, illegal, or in direct conflict with the Platform's Safeguarding Framework as well as the hereby guide on anti-Harassment, anti-intimidation and anti-bullying.

[1] Save the Children Anti-Harassment, Intimidation and Bullying Policy: LONDOCS\3548558.05 (savethechildren.net)

- **Bullying** is any repeated offensive, abusive, intimidating, malicious or insulting behaviour which: (i) makes the recipient feel upset, threatened, humiliated or vulnerable or undermines their self-confidence or causes them to suffer stress or feel upset; and (ii) a reasonable observer would identify as amounting to bullying behaviour.
- **Sexual exploitation** - Any actual or attempted abuse of a position of vulnerability, differential power, trust, or dependency, for sexual or sexualised purposes. This includes the offer or promise of monetary, social, political benefits as an incentive or form of coercion.
- **Sexual Abuse** - The threatened or actual physical intrusion of a sexual or sexualised nature, including inappropriate touching, by force or under coercive conditions, sexual assault and rape. It may also include threatened or actual non-physical intrusion (unwanted and/or uninvited exposure to pornography, texts, images, and so on, the sharing of images, texts and so on, demands for sexualised photographs etc.).
- **Discriminatory and disrespectful behaviour** - Other forms of harassment [that] may relate to a person's gender, marital status, race (including colour, nationality or ethnic or national origin), religion or belief, age or disability and may involve bullying or intimidation or both.

Preventing and Addressing Harassment, Intimidation, and Bullying

The Platform is committed to preventing and addressing all forms of harassment, intimidation, and bullying. To ensure a safe, inclusive, and respectful environment, the Platform follows four key safeguarding principles: Awareness, Prevention, Reporting, and Responding.

Awareness

Everyone involved in the Platform—including staff, partners, member organisations, and suppliers—must understand their responsibilities in creating a safe space for children and adults.

  - The Code of Conduct sets out professional and ethical expectations for all individuals engaging with the Platform.
- The Code of Behaviour provides clear guidance on safe and respectful interactions with children.
  - The Safeguarding Framework outlines reporting and response mechanisms to ensure everyone knows how to act if a concern arises.
- Everyone engaging with the Platform receives safeguarding information and briefings to ensure they understand expected behaviours and how to report concerns.

Prevention

The Platform actively integrates safeguarding into all activities, whether online or in-person. Measures include:

- Clear expectations of behaviour, as set out in the Code of Conduct, Code of Behaviour and activity-specific guidelines.
- Risk assessments for all activities, with additional safeguards for in-person events.
- Guidance for accompanying adults, explaining their role in supporting and protecting children.
- Online safety measures, in line with the Better Internet for Kids (BIK+) strategy and GDPR protections for children's data.

Reporting

It is essential that anyone who sees or suspects harm reports their concerns immediately.

- How to report a concern:
  - Speak to a Child Protection Officer (CPO) or Child Empowerment Officer (CEO).
  - Email cppsafeguarding@icf.com (after 31 October 2026, please use the following email address: EU-CHILDPARTICIPATION@ec.europa.eu)
  - Submit a Safeguarding Incident Reporting Form to a designated Platform representative or via email.
- Concerns involving children are handled under the Safeguarding Framework.
- Concerns involving adults are managed by the Secretariat Team, ensuring the appropriate action is taken.

Responding

The Platform acts immediately when a concern is reported.

- All reports are taken seriously, assessed carefully, and managed with confidentiality.
- Where necessary, cases are referred to child protection services, law enforcement, or other appropriate authorities.
  - Individuals who engage in misconduct will face disciplinary action, which may include removal from the Platform, or information to the relevant institution.
- Victims are supported, and follow-up actions are taken to ensure their safety and well-being.

If needed, further and tailored support will be offered to survivors/complainants regardless of whether a formal response is carried out (namely, an investigation). Support will also be offered as appropriate to others involved in response, recognising the impact this can have, for example on witnesses and those accused of carrying out inappropriate or harmful behaviours.

A Shared Responsibility

- Everyone engaging with the Platform must report any concerns.
- Failure to report a concern is a breach of the Anti-Harassment, Anti-Intimidation, and Anti-Bullying Guide, the Code of Conduct, and the Code of Behaviour.
- The Platform expects all individuals to contribute to a culture where harassment, intimidation, and bullying are never tolerated.