Safeguarding, Safety and e-Safety Policy Document

Use the table below to provide the version number, the author(s) who implemented the version, the date of the version, the document number of the version, the date that version was approved, and a brief description of the reason for creating the revised version.

Version #	Prepared by	Revision Date	Document No:	Approval Date	Reason
1.0	Umut HALLAC	22.01.2023	FRM-012	23.01.2023	First plan
1.1					
1.2.					

Contents

1. INTRODUCTION

During the project activities, safety, e-safety and protection activities are of utmost importance to the project management. Therefore, all necessary measures will be taken to ensure that every member of the project team is not exposed to harm. These measures also bind the project stakeholders and the target audience. In this context, the project team will take the necessary safety, e-safety and protection measures against all kinds of inappropriate behavior, including sexual and moral abuse, intercultural problems, accidents, fire, alcohol and substance abuse, negligence, humiliating acts. For this, a safe environment will be created that respects the rights of project components and protects, safeguards and promotes their well-being. In addition, these measures will enable the project components to realize their learning experiences in a safe, effective and sustainable way. An effective procedure has been prepared to promote and guarantee the safety and protection of project components and project activities that are part of the MUDI project.

Within the framework of these procedures, the persons involved in the project components will have the opportunity to fully benefit from personal and professional development opportunities. This will be ensured in a safe environment that respects and protects the rights, physical and emotional integrity, mental health and well-being of all constituents. Each organization participating in the program will comply with safety and e-safety procedures in their activities. Furthermore, these organizations have effective procedures and arrangements in place to promote and guarantee non-discrimination of project constituents.

In today's world, internet-oriented technology and individuals are inseparable. With this, it has become necessary to establish e-safety policies and policy guidelines within MUDI in order to provide a safe environment, reduce the types and frequency of risks and create a positive environment for individuals to use the internet and their desire to access resources via the internet.

In this context:

This policy document complements the Erasmus+ Program Guidelines [Version 1 (2023): 23-11-2022]. This policy document applies to the following components.

- The project focal points involved in managing the MUDI project.
- Managers of the institutions that make up the MUDI project.
- Project stakeholders.
- Project target group and final beneficiaries.

2. POLICY INTENT

This policy document commits to take all reasonably practicable steps to ensure the protection and safety of project components and the e-safety of project activities as stated in the Introduction. All parties signing this policy document have read, understood and committed to be bound by the terms, conditions and obligations contained in this document. This commitment includes the following:

- On 23 November 2022, version 1 of the Erasmus+ Programme Guide was published. References to the heading "PROTECTION, HEALTH AND SAFETY OF PARTICIPANTS" in these guidelines.
- Roles and responsibilities of organization managers in the context of this policy document.

3. PURPOSE

The purpose of this policy document is to ensure that roles, responsibilities and accountabilities for the protection and safety of project components during the implementation of the MUDI project are defined and understood by all organizational managers.

The partners and contact persons of the MUDI project are jointly responsible for the overall review, analysis and mitigation of all protection and safety factors, taking into account the age, maturity, fitness levels and risk tolerances of the participants.

4. RESPONSIBILITY

- Activities are carried out in environments where project components are safe. For this, project managers (Heads of partner organizations.) are responsible for fostering a culture of safety for the project team and disseminating this culture within the team.
- Completion of Risk Assessment during the project process.
- Conduct project preparation and activities in a manner consistent with this policy document.
- During the opening and closing meetings, the host country assigns a facilitator to address the grievances/requests/demands of the participants regarding protection, safety, e-safety concerns.
- The host country provides a site-specific briefing to the participants prior to the meeting.
- The host country will ensure the protection of participants in a safe, respectful and non-discriminatory environment during key activities.
- The responsible country takes e-safety measures for the interim meeting at M13.

5. CONTENT

A safe and organized environment is also the key to a successful project. Project components who feel insecure cannot have the necessary motivation to carry out a healthy working process. This project is not only focused on success. MUDI aims to provide a physically, psychologically and socially safe environment for the project components.

In addition, cyberbullying using digital technologies is frequently seen on social media, instant messaging platforms or online gaming platforms. The development of policies that will not compromise cyberbullying behaviors that are repeated to intimidate, disturb or embarrass targeted individuals and preventive measures to minimize these risks are part of our policy document.

Based on these approaches, the content of our safety, e-safety and protection policy is determined as follows:

5.1 DIGITAL SAFETY

- Conference calls such as webinars etc. will be held on sites that all users can access and participate in.
- The date, time and content will be communicated with other stakeholders and participants before webinars etc. are organized.
- Online meeting passwords will not be shared publicly. Only those who are required to attend the meeting will be given this password.

5.2 PROTECTION OF PERSONAL DATA

During the project process, MUDI components will not be photographed and video recorded without permission. All photos and videos to be shared are shared with the permission and written (e-approval) approval of the relevant persons in accordance with the project policy.

Necessary measures will be taken to eliminate the privacy and safety concerns of the project components. In addition, the coordinating country is responsible for taking the necessary actions in

case of any problems. Project contact persons will act together with the coordinating country to solve the problems.

- All photos and videos to be shared are shared with the permission and approval of the person concerned in accordance with the project policy. Project components have the right to know on which platform their photos will be shared.
- It is mandatory to use the Annex-1 document for all sharing. (This document is prepared in digital environment.)

ANNEX-1 FORM

This document contains the authorization to use the image of a natural or legal person. The coordinating country is responsible for preparing and issuing this form.

ANNEX-1, IMAGE USE AUTHORIZATION FORM
The participant whose photograph will be used;

Name-Surname:
Country:
As the real person whose information is written above, I give my consent for my image (photo and video) to be used on the following platforms.
Date of Consent:

☐ On the website

☐ On social media accounts

☐ Within the Erasmus+ project

Signature (checkbox)

Regulation 2018/1725 sets forth the rules applicable to the processing of personal data by European Union institutions, bodies, offices and agencies. It is aligned with the General Data Protection Regulation and the Data Protection Law Enforcement Directive. It entered into application on 11 December 2018

5.3 SAFE USE OF THE INTERNET AND INFORMATION DEVICES

In today's technology, the internet has become one of the most important tools for accessing information. The internet network to be used during the project is subject to appropriate safety processes. Comodo Firewall, a firewall program, and McAfee, an anti-virus program, are used in the infrastructure of all partner countries. Hotspot safety measure for wifi is also included in the system. Within the scope of this system; online materials are an important part of teaching and learning and are actively used in the project.

5.4 USE OF CELL PHONES AND PERSONAL DEVICES

The project team is aware that any content, images and messaging they send via social media or chat programs carry legal responsibility within the scope of Personal Data Protection. In this context, any content, images and messaging that may be inappropriate and violate personal rights will never be shared.

6. TRANSNATIONAL MEETINGS

In the context of the Environmental Policies of this project (Annex-13 Document.), mobility is foreseen only for the kick-off (M2) and closing (M24) meetings and the other meetings are virtualized. In this context, the safety and protection measures to be taken in M2 and M24 will be as follows:

6.1 COVID-19

Covid19 safety measures will be taken especially for health protection. Before the meeting, the temperature of the participants will be checked with a non-contact thermometer and participants with fever will be immediately directed to the health institution. Disposable masks and disinfectants will be distributed to all participants before and between each session. The meeting hall will be ventilated and disinfected before the meeting and during lunch break. Following this, all participants will be asked to get vaccinated against Covid19 risk such as Biontech, Astra Zeneca, etc., or those who are not vaccinated will be asked to have a PCR or antibody test at least two days before the meeting. In addition, unvaccinated participants will have a PCR or antibody test before the meeting, in the middle of the meeting and on the last day of the meeting.

6.2 INSURANCE

Participants in a mobility activity under all Key Actions of the Erasmus+ Program must be insured against the risks associated with their participation in these activities. Therefore, all participants will be covered by an insurance policy before traveling to the host country. This insurance policy will cover

- A comprehensive policy including loss or damage to luggage.

- It will also cover the repatriation of the body to the home country in case of an unintentional death during the meeting (the project team has prepared all possible scenarios).

- This policy will cover all accidents and serious illnesses, including permanent or temporary incapacity/damage.

- Participants will be required to have a European Health Insurance Card (EHIC). EU citizens are strongly encouraged to obtain an EHIC so that in other EU Member States where they are temporarily visiting, they can benefit from health care free of charge or under the conditions applicable to host country nationals.

6.3 HEALTH

The host country will take special additional measures for participants with chronic diseases such as diabetes, high blood pressure, etc. As part of these measures, a first aid kit will be available in the meeting room. In addition, a special diet and nutrition program will be prepared for participants with dietary sensitivities such as pescetarians, gluten sensitivity, vegan, vegetarian, etc.

6.4 EMERGENCY

Host countries have prepared a "Risk Action Plan" that includes arrangements for emergency response. (This plan includes contact numbers of the group leaders of the host country that can be reached 24/7; contact information of hospitals and police stations for emergencies).

6.5 SAFE ACCOMMODATION

- Creation of a social distancing plan,

- Alcohol-based hand antiseptic or disinfectant units are available in the common areas of the facility,

- The hotel has taken Covid-19 measures.

- The necessary guidance signs for emergencies are available on the walls.

7. GENERAL APPROACH

- The welfare of project components is paramount.
- Project team members have the right to be protected from harm or abuse regardless of age, disability, gender, racial or ethnic origin, religious beliefs and sexual orientation.
- The project partners consider it important that the project team working under MUDI is treated with care, respect and dignity; that the project team is communicated with in a clear and understandable manner; and that the risks to which the project team may be exposed in its activities are assessed.
- The safety culture of this project consists of multifaceted components ranging from personal protective equipment, warning signs, activity hygiene, project risk assessment, lead times and quality. In this context, the role of the partner organizations in transnational activities is defined as follows

i. A risk assessment and risk management approach is adopted.

ii. Ensuring that each member of the project team has access to health, safety and protection services,

iii. Establishment of the organization of first and emergency aid services,

iv. Ensuring data flow,

v. Prioritize collective and personal protection measures,

vi. Proper use of personal protective equipment,

vii. Taking precautions against any negative situation related to occupational health and safety during the activities,

viii. The host country cooperates with participants on health and safety and avoids unsafe situations,

8. TRANSPARENCY AND DUE PROCESS

8.1 Transparent safety management

Project partners will demonstrate their commitment to safety in all areas. The words and deeds of the project partners will be consistent.

8.2 Increased awareness on safety

The project team will be in close contact with relevant stakeholders and target audience in the operational environment to ensure that they are aware of the existing safety conditions.

8.3 Reporting on safety

A positive safety culture requires reporting of safety issues and incidents (accidents, near misses, safety concerns, etc.). An appropriate feedback system has been developed for this.

8.4 An open culture

Each member of the project team will feel comfortable raising any safety incidents and concerns with the project managers.

8.5 Effective communication

Effective communication is vital to achieve safety and effective protection. Communication will therefore include transparency.

8.6 Legal Process

With respect to damages suffered by the legal entity or personnel of the organizations, to the extent that such damages are not caused by the serious or willful negligence of the other party or its personnel, it shall exempt the other from any civil liability. However, in respect of damages suffered by the legal entity or its staff, to the extent that such damages are caused by the serious or wilful negligence of the other party or its staff, the injured legal entity and its staff shall, without prejudice to any other rights, have the right to bring an action before an international court in the context of applicable EU law, international law..