



PICUM Safeguarding Policy

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Background

PICUM and its members are committed to take appropriate steps to ensure the health and well-being of their staff and colleagues, the beneficiaries of their work, and others with whom they cooperate. PICUM aims to implement the necessary policies and procedures to safeguard children and vulnerable adults with whom it comes into contact and has developed the following safeguarding policy framework.

The elements included in this safeguarding framework further clarify and develop existing PICUM commitments to keeping everyone safe in the context of its activities. They build upon the following internal documents:

For PICUM Board and members:

- PICUM Members Code of Conduct.¹
- PICUM Statutes

For PICUM staff members:

- PICUM Working Regulations (in particular Chapter 11 on Sanctions for misconduct or negligence and Chapter 12 on Contract termination)
- Annex 3 to the Working Regulations (Grievance and conflict resolution policy)
- Annex 5 to the Working Regulations (Disciplinary action policy)

PICUM's safeguarding policy is the result of a structured and participatory development process involving staff, members, governance and external

experts. In October 2024, the Board held initial discussions on the policy's scope and overall approach. Following an external audit, a team workshop further contributed to identifying areas of risk in February 2025 which allowed reflecting collectively on PICUM's learning and experience from recent years of working with undocumented people. To consolidate this internal review, members were then consulted about their experience with safeguarding issues and policies via an online survey. This consultation with PICUM members was conducted in April 2025 to gather insights on their experiences and existing policies. The survey also fed into the mapping of possible risks stemming from PICUM's work. The consolidated findings were subsequently presented and discussed with members at the 2025 General Assembly. The process concluded with the Board endorsing the PICUM safeguarding policy statement and framework on the 26th May 2026.

Monitoring and evaluation of the policy

PICUM's safeguarding policy will be made accessible to all staff, trainees, members and volunteers. Staff will regularly receive comprehensive training on its content. The content of this policy will be formally reviewed every two years to ensure it remains relevant, effective, and responsive to evolving needs. We intend to continue refining and strengthening PICUM's safeguarding framework as we deepen our understanding through ongoing practice, feedback, and learning.

¹ See clause 3 "Members agree to take appropriate steps to ensure the health and well-being of their staff and colleagues, the beneficiaries of their work, and others with whom they cooperate. Members agree to have in place the necessary policies and procedures to safeguard children and vulnerable adults with whom they come into contact."

PICUM Safeguarding Policy Statement

Description of the organization and mission

PICUM is a network of organisations working to ensure social justice and human rights for undocumented migrants. We seek a world where human mobility is recognised as a normal reality, and where all people are guaranteed their human rights and have a dignified standard of living, regardless of migration status. With our network and partners, we research and advocate for evidence-based, holistic and humane responses to the realities of undocumented migrants and to people who want to come to Europe to work or for other reasons. We provide a platform to engage policymakers and the public at the international, European, national, and local levels.

Commitment

PICUM has a commitment to safeguard and promote the welfare of children and adults at risk, as well as staff, interns, volunteers, beneficiaries, and other people who come into contact with the organisation through its work. We are committed to ensuring that our work does not harm the people we seek to help.

PICUM and its members are committed to take appropriate steps to ensure the health and well-being of their staff and colleagues, the beneficiaries of their work, and others with whom they cooperate. For this purpose, PICUM aims to implement the necessary policies and procedures to safeguard children and vulnerable adults with whom we come into contact.

PICUM Members' Code of Conduct foresees that members have in place the necessary policies and procedures to safeguard children and vulnerable adults with whom they come into contact. In fact, most PICUM members are experienced in this field and already have a safeguarding policy or are in

the process of developing one. Members are further requested to respect PICUM's safeguarding policy.

Scope of policy

PICUM's work mainly focuses on advocacy concerning people with insecure migration status. Undocumented migrants and people with insecure migration status are vulnerable to a variety of risks including arrests, exploitation, violence and abuse. They may also experience work without any protection of their rights, exploitation in the housing sector, family separation, blackmail, exploitation by traffickers, etc. Experience of insecure status and multiple forms of discrimination and hardship can take a significant toll on people's health and wellbeing.

While many of PICUM's member organisations engage in direct service towards undocumented people, or otherwise work directly with migrant communities, PICUM secretariat staff have limited contact with children or vulnerable adults. This contact, when it occurs, is generally in the context of occasional events or communications activities.

PICUM may also receive direct requests for information and support from undocumented people. Such requests may occur at PICUM's premises with people coming by the office after finding our contact details on the web, as well as via phone calls or email requests. A guide entitled [Practical information for undocumented migrants in Belgium](#) is publicly available and regularly updated to support the safe referrals of individual cases to relevant services.

Violence and abuse covered by PICUM's safeguarding policy refer to the main forms of violence: physical, sexual, emotional, psychological and neglect. Violence is a human rights violation. It covers all acts that result in, or are likely to result in physical, sexual, psychological or economic harm

or suffering, including threats, coercion or arbitrary deprivation of liberty, whether occurring as a single incident or repeatedly. In the context of PICUM's safeguarding policy, this also covers specific forms experienced by people with irregular migration status such as trafficking of human beings and discrimination.

Relevant international legislation includes:

- [Istanbul Convention](#), article 3(a)
- [International Labour Organisation Convention No. 190 \(C190\)](#), article (1)
- [UN Convention on the Rights of the Child](#)
- [UN Convention on the Rights of Persons with Disabilities](#).

Additional regional instruments include, among others:

- [EU Charter of Fundamental Rights](#)
- [Violence Against Women Directive](#), article 2(a)
- [Victims' Rights Directive](#),
- Council Framework Decision [2002/629/JHA](#) of 19 July 2002 on combating trafficking in human beings
- Council framework Decision [2004/68/JHA](#) of 22 December 2003 on combating the sexual exploitation of children and child pornography.

The policy and its related procedures apply to all staff, trainees, volunteers, beneficiaries, and board members of PICUM. Members are bound by the PICUM members' code of conduct. They are also encouraged to respect PICUM's safeguarding policy, and to develop their own. Service providers

and other external collaborators should be sensitized to the scope of this policy, expected behavior and implications of misconduct.

Statement on values

Our work is grounded in principles and values of social justice, anti-racism and equality.

PICUM is committed not to discriminate against any person or group based on any ground such as migration status, nationality, race, ethnicity, religion, belief, gender identity or expression, sexual orientation, disability, age, language, or socio-economic background.

PICUM commits to ensuring gender equality and to taking an intersectional approach to identity in our governance, management, and operations. We recognise overlapping systems of oppression that affect people with insecure residence status, and are committed to strengthening participation of people with lived experience in our work.

We believe everyone has a responsibility to promote the welfare of all children and vulnerable adults, to keep them safe and to take all necessary precautions to ensure PICUM's work and activities are designed in a way that protects these.

For PICUM, the right to privacy and data security is a primary concern. We commit to implementing a strong data protection policy within the practice of the organisation and will collect personal information respecting the principles of necessity and proportionality.

PICUM Child Protection Policy

Additional behavioral expectations should be respected by all PICUM staff when interacting with children given their particular vulnerability. All children and adolescents - defined by the UN Convention on the Rights of the Child as any person under 18 years of age - have equal rights to protection.

PICUM recognises that some children are additionally vulnerable due to the intersection of various factors including their residence status, the impact of any forms of discrimination and/or trauma they may have currently or previously faced, their level of dependency, communication needs or other issues.

The circumstances in which PICUM staff may interact with children include events where children may be present, activities with members which directly involve children, and interviews for research and analysis purposes or for communication purposes.

PICUM staff should uphold the dignity of each child and treat all children with respect at all times. PICUM staff must remain aware of perceptions and appearances in their language, actions, and relationships to children and safeguard them from harm.

Child specific principles

All PICUM staff, members and volunteers are expected to uphold the highest standards of integrity and professionalism when interacting with children. The following principles should be implemented to ensure the safety, dignity, and well-being of every child:

- **Respect for all children and families**
- **Listening to children:** Children must be given the opportunity to express themselves.

- **Creating a safe, welcoming, and inclusive environment** is our collective responsibility.
- **Sensitivity in presence of children:** Individuals must remain mindful of their behavior around children including by using appropriate language, avoiding inappropriate conversations or jokes, and being respectful in physical gestures and body language.
- **Respect for cultural differences:** Certain practices in some cultures may be widespread but cause harm to children. In such cases, child protection and well-being must take precedence.
- **Transparency and accountability:** All actions and whereabouts, especially when interacting with children, must be transparent. Staff and volunteers should avoid secrecy or situations that could be misinterpreted or raise concerns about inappropriate behavior.
- **Presence of another adult:** Whenever possible, at least one other adult should be present when working directly with a child. One-on-one interactions must be approached with caution, ensuring that they occur in open or observable settings and only when necessary. Appropriate discretion must be exercised at all times.
- **Mandatory reporting of concerns:** Any suspicions, disclosures, or evidence of child abuse, exploitation, or any other child protection concerns must be reported immediately through the appropriate organizational channels. Silence or inaction is not acceptable.
- **Compliance with local legislation:** All actions must comply with the relevant child protection laws and regulations of the country in which the activity takes place. Ignorance of the law is not a valid excuse for non-compliance.²

² PICUM's secretariat is based in Belgium, and applicable legislation include the Belgian Constitution ([Art. 22bis.](#)), the [Belgian Code of Criminal Procedure](#) (Art 10ter); [décret du 18 janvier 2018 portant le Code de la prévention, de l'aide à la jeunesse et de la protection de la jeunesse](#); [Wet van 28 november 2000 strafrechtelijke bescherming van minderjarigen](#); [Loi du 27 mars 1995 insérant un article 380quinquies dans le Code pénal et abrogeant l'article 380quater, alinéa 2, du même code](#); [Loi du 13 avril 1995 relative aux abus sexuels à l'égard des mineurs](#) et [Loi du 13 avril 1995 contenant des dispositions en vue de la répression de la traite des êtres humains et de la pornographie enfantine](#).

PICUM Code of Conduct for Events

Code of Conduct for Participants at PICUM events

In-person and online events

PICUM is committed to create inclusive, respectful, and safe spaces for exchange, organising and learning. Whether events are held online or in person, we aim to ensure that all participants, particularly people in vulnerable situations, including undocumented people, can participate without fear of harm, harassment or exclusion.

The purpose of this Code of Conduct is to promote respectful behaviour and reduce the risk of harm, harassment or exclusion within PICUM events

and interactions. It sets specific expectations for how we engage with each other, especially across differences in background, status, identity, and lived experience.

By participating in an event, meeting or online space led or co-organised by PICUM, you agree to follow this Code of Conduct. Violations may result in removal from the event or space and may result in further action, including restricted access to future PICUM activities. This Code applies to all participants, including staff, members, speakers, facilitators, and service providers.

Purpose of the events Code of Conduct

Expected Behaviour

PICUM values diversity of perspectives and recognises that respectful disagreement and critical dialogue are essential. At the same time, we are committed to protecting participants from verbal, non-verbal or physical behaviour that undermines their dignity, wellbeing or safety.

All participants are expected to:

- **Treat others with dignity, courtesy and respect**, regardless of migration status, nationality, race, ethnicity, religion, belief, gender identity or expression, sexual orientation, disability, age, language, or socio-economic background.
- **Listen actively, give space to others**, especially those often unheard, and **be mindful** of how power dynamics affect who feels safe to speak.
- **Respect people's privacy and personal boundaries**. No one should feel pressured to share personal experiences, especially related to migration, violence, trauma or hardship.
- **Use inclusive and non-discriminatory language**, avoiding stereotypes, assumptions or generalisations of individuals or groups.

- **Ask for consent** before taking photos, videos, screenshots or quoting someone, both during and after events.
- **Create an inclusive and accessible environment**, including for people using interpretation, people with lived experience of undocumented status, and those who are less confident in the event language(s).
- **Follow the guidance of moderators and facilitators**, and participate in ways that are fair, open and supportive to others.

Unacceptable Behaviour

The following behaviours are considered violations of this Code of Conduct and will not be tolerated:

- **Verbal, non-verbal, written or physical harassment**, including intimidation, mocking, or unwanted physical contact.
- **Discriminatory comments, remarks or conduct**, including slurs, insults, jokes, or "humour" based on as migration status, nationality, race, ethnicity, religion, belief, gender identity or expression, sexual orientation, disability, age, language, or socio-economic background.

- **Deliberate misgendering** or refusal to address people as they request.
- **Outing any aspect of someone's identity**, including sexual orientation, gender history, migration status, religion, or lived experience, without their explicit and informed consent.
- **Inappropriate language, remarks, gesture and attention**, including intrusive questions, and sexualised comments.
- **Sharing private or sensitive information without permission**, such as personal stories, email content, or remarks made in confidence.
- **Recording, taking pictures, or quoting without consent.**
- **Refusing to follow facilitation guidance** including repeated interruptions, refusal to respect time limits or facilitation, or mocking interpreters.
- **Dismissing someone who raises a concern** or minimising the harm they report.

Reporting and Response Procedures

If you experience or witness a violation of this Code of Conduct, you are encouraged to report it. You may:

- Speak directly to the event's safeguarding focal person(s);
- Email: safe@picum.org. You may report anonymously or include your contact details if you would like to receive follow-up. All reports will be handled confidentially, timely and with care.
- PICUM will assess each situation and may take action against the perpetrator, including:
 - Removal from the event or meeting;
 - Restriction from future participation in PICUM activities;
 - Referral to the relevant national authorities in cases of severe violations.
- PICUM will assess each situation and may take action regarding the victim, including:
 - Providing an adequate, safe and protective environment;
 - Taking prompt action to refer to relevant support services.

We rely on your cooperation to uphold these principles and protect the wellbeing of all members of our community.

Internal guidance to prevent and handle safeguarding incidents during events.

The PICUM Code of Conduct for Events should be implemented in the context of:

- All events organized or co-organised by PICUM: meetings, workshops, conferences and screenings.
- The Code of Conduct is valid for in-person and online events (hosted by PICUM on platforms such as Zoom or Teams).

For smaller, informal or internal meetings, PICUM

may share simplified "housekeeping rules," but respectful conduct as outlined above is still expected. PICUM is committed to fostering inclusive spaces where participants can express themselves without fear of harm or discrimination.

The events code of conduct applies to all participants at PICUM events including the Secretariat, members, service providers (interpreters, catering, tech), guest speakers, consultants, facilitators, participants, children (if any).

Ahead of meetings

- Ahead of the event, a person of contact among participating staff is appointed as focal point for safeguarding related issues during the event.

Registration

- To register for a PICUM event, participants will be required to endorse the PICUM Code of Conduct for Events in order to complete the registration.
- For PICUM events which do not require prior registration (e.g. bi-monthly member calls/ member drop in calls) the facilitator must dedicate a few minutes to announce the applicable rules and procedures concerning the code of conduct at the start of the meeting.

At events

- A poster highlighting the expected behaviour during PICUM in person events is posted on walls along with information on the applicable complaint mechanism/contact details for reporting incidents.
- A slide highlighting the expected behaviour during PICUM events is shown and read out at the beginning of each event by the facilitator/ meeting host. briefly announcing the expected behaviour and directing to the designated person of contact
- A secure inbox is publicised among participants to report incidents

Consequences in cases of a safeguarding incident

- Verbal or written warning to the individual concerned;
- Removal from the event or meeting (if necessary);
- Restriction from future participation in PICUM activities;
- Follow-up and report after event with clear description of what steps are being taken
- Confidentiality guarantees
- Referral to the relevant national authorities in cases of severe violations.

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PICUM

For undocumented migrants,
for social justice.

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