

EDSO SAFEGUARDING POLICY

European Deaf Sports Organisation

Draft for consideration by the EDSO Executive Board

Prepared in alignment with the EDSO Constitution (August 2025 Edition)
and the EDSO Code of Ethics

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Motto: Unity in Sport

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Abbreviations used in this Policy:

- CAS: Court of Arbitration for Sport
- CRPD: United Nations Convention on the Rights of Persons with Disabilities
- EDG: European Deaf Games
- EDSF: European Deaf Sports Federation
- EDSO: European Deaf Sports Organisation
- EDYG: European Deaf Youth Games
- GA: General Assembly
- ICSD: International Committee of Sports for the Deaf
- IOC: International Olympic Committee
- NDSF: National Deaf Sports Federation
- SGO: Safeguarding Officer
- SCCWG: Safeguarding Cross-Commission Working Group (if established)

1. SCOPE OF THE DOCUMENT

As part of the Deaflympic Movement and in accordance with its Constitution (August 2025 Edition), the European Deaf Sports Organisation (EDSO) has a role in encouraging the welfare, safety and well-being of individuals involved in Deaf sport within the EDSO framework, in particular in connection with EDSO activities and events, with a particular emphasis on children, young people, Deaf athletes and vulnerable adults. Accordingly, it acknowledges that neglecting safeguarding responsibilities and failing to meet related legal and ethical requirements not only leads to legal repercussions but also erodes trust and damages the organisation's reputation, resulting in lasting negative impacts.

The EDSO Safeguarding Policy defines the EDSO's role and responsibilities in promoting safeguarding principles within its mandate. It aligns with recognised international safeguarding standards, including the UN Convention on the Rights of the Child, the UN Convention on the Rights of Persons with Disabilities (CRPD), the International Safeguards for Children in Sport, and the IOC Framework on Safeguarding Athletes from Harassment and Abuse, as reference points for guidance. The EDSO Constitution and the EDSO Code of Ethics remain the primary binding instruments governing the EDSO's competence, procedures and disciplinary framework, including the applicable internal appeal pathway. Within this framework, safeguarding-related concerns involving EDSO bodies, staff, commissions, working groups and other persons covered by the EDSO Code of Ethics, including in the context of EDSO-sanctioned events (European Championships of the Deaf, European Deaf Games, European Deaf Youth Games and other EDSO Sports Events), are addressed through the established EDSO mechanisms.

The EDSO is committed to addressing safeguarding across its operations and to supporting its members — the National Deaf Sports Federations (NDSFs) and European Deaf Sports Federations (EDSFs) — through guidance, capacity-building, educational support and knowledge-sharing, in line with the EDSO vision, mission and objects set out in the Constitution and international best practices. In doing so, the EDSO aims to contribute to clarity on roles and referral pathways by encouraging appropriate cooperation among relevant stakeholders, while respecting that legal duties and case handling responsibilities may differ across national jurisdictions and competent authorities.

This Policy should be understood as an expression of the EDSO's commitment to safeguarding as a shared responsibility and to encouraging a culture where the welfare of personnel, athletes and entourage is prioritised, and where concerns are raised and addressed in a timely and appropriate manner. It also aims to minimise the risk of harm and re-traumatisation, while avoiding unrealistic expectations about the EDSO's ability to resolve safeguarding concerns across Deaf sport in Europe beyond its mandate.

The EDSO Safeguarding Policy is supported by complementary documents and resources, including any future EDSO Safeguarding Guidelines for NDSFs/EDSFs and event-specific safeguarding protocols for EDSO Sports Events.

2. LEGAL FRAMEWORK AND GUIDING PRINCIPLES

2.1 Legal Framework and Compliance

International Standards Alignment. The EDSO promotes alignment with international safeguarding standards in sport, including those set by the IOC, ICSD, the European Union and relevant human rights instruments (in particular the CRPD), which serve as important points of reference and

guidance. It is also aligned with the EDSO Code of Ethics, ensuring that safeguarding measures support the broader principles of respect, dignity, integrity, equality and inclusion. In doing so, the EDSO acts within the scope of its mandate and does not assume legal obligations or supervisory functions beyond those defined in its statutory framework.

Compliance with National and International Laws. The EDSO acts in compliance with the applicable laws of the countries in which it operates and organises events, and takes into account relevant international human rights, child protection and disability rights standards.

The Court of Arbitration for Sport (CAS). Cases that should be appealed to CAS under the jurisdiction of the EDSO are handled in accordance with the EDSO Constitution (Article 21 – Dispute Resolution) and the EDSO Code of Ethics. The jurisdiction of CAS is defined therein and applies to appeals in disciplinary matters within the EDSO framework, following exhaustion of the internal appeal pathway provided for in the EDSO Constitution and the Code of Ethics (Ethics Commission → Legal Commission → CAS).

2.2 Guiding Principles

The EDSO's Safeguarding Policy is based on the following principles, which serve as ethical and cultural guidance:

Zero Tolerance. The EDSO maintains a zero-tolerance policy for any form of abuse, harassment, neglect or interpersonal violence, and expects the same from its Members (NDSFs and EDSFs), as a statement of principle and conduct.

Confidentiality. Confidentiality is a fundamental guiding principle of the EDSO's safeguarding framework. All safeguarding-related processes shall respect the principles of confidentiality, proportionality and transparency, in accordance with the EDSO Code of Ethics (in particular Article 15 on Confidentiality). The duty of confidentiality and the consequences of its breach ensure the integrity of reporting procedures and the protection of all persons involved.

Duty of Care. The EDSO recognises its responsibility to uphold the welfare and dignity of all participants, particularly vulnerable groups such as children, young people, Deaf athletes and persons with additional disabilities, within the scope of its mandate.

Empowerment and Accessibility. The EDSO encourages a culture where individuals feel empowered to report safeguarding concerns, certain of confidentiality and prompt action, without implying automatic procedural consequences. Communication access, including International Sign and qualified sign language interpretation, shall be ensured in accordance with the EDSO Constitution and Code of Ethics.

Collective Responsibility. Safeguarding is a collective responsibility across the Deaflympic Movement in Europe, requiring coordination between the EDSO, NDSFs, EDSFs, sports organisations and other stakeholders, while respecting the respective roles and responsibilities defined in the EDSO governance framework.

These Guiding Principles are not intended to constitute legally binding or sanction-imposing standards. The applicable disciplinary framework derives exclusively from the EDSO Constitution and the EDSO Code of Ethics.

3. ROLE OF THE EDSO

As a continental sports body for Deaf sports, the EDSO has a clearly defined jurisdiction, as set out in the EDSO Constitution and further specified in the EDSO Code of Ethics, particularly in relation to

concerns arising from EDSO activities and events. Thus, the EDSO has a distinct role in encouraging an inclusive and safe environment, which includes the following areas of responsibility:

Setting Standards. The EDSO will provide overarching guidance and develop safeguarding frameworks that align with international best practices and the CRPD. Accordingly, this Policy includes clear definitions of harassment and abuse consistent with applicable laws, applicable within the scope of the EDSO's mandate as defined by the EDSO Constitution and the EDSO Code of Ethics. The Safeguarding Officer (SGO), acting in a supportive and coordinating capacity, in collaboration with relevant EDSO commissions and bodies acting within their respective mandates, will support the implementation of the Policy and contribute to its periodic review, to ensure relevance and consistency within the existing EDSO governance framework.

Nothing in this provision is intended to confer supervisory, investigative or disciplinary powers on the Safeguarding Officer. Disciplinary authority at first instance lies exclusively with the Ethics Commission in accordance with the EDSO Constitution (Article 19) and the EDSO Code of Ethics, subject to appeal to the Legal Commission and thereafter to CAS in accordance with the appeal pathway defined in the EDSO Constitution and Code of Ethics.

Involvement of Athletes. Athletes will be actively involved in the development and review of safeguarding policies and procedures, ensuring that their perspectives are considered. Accordingly, the EDSO Athletes' Commission (Article 19 of the Constitution) will play a key role in ensuring that athletes' perspectives are considered, including by having a representative involved in any Safeguarding Cross-Commission Working Group or equivalent consultative body.

Establishing Partnerships. Create partnerships with relevant national and international organisations to encourage a coordinated and effective approach to safeguarding in Deaf sport. Accordingly, the EDSO is expected to cooperate with complementary stakeholders such as ICSD, the IOC, European sports organisations, child protection agencies, safeguarding experts, legal advisors, medical practitioners, mental health professionals and organisations of persons with disabilities.

Case Management and Investigations. Management of concerns or reported incidents through a detailed, fair, impartial and structured process following established safeguarding protocols and the EDSO Code of Ethics. This involves the coordination of appropriate processes, ensuring due process, and providing support to those involved, including follow-up actions within the EDSO's mandate. Disciplinary assessments and decisions at first instance are carried out exclusively by the Ethics Commission in accordance with the EDSO Constitution and the EDSO Code of Ethics, subject to appeal in accordance with the appeal pathway defined therein.

Supporting NDSFs, EDSFs and their compliance with safeguarding standards. Offer of signpost resources, tailored advice, educational training, capacity-building and knowledge-sharing opportunities for European NDSFs and EDSFs to implement effective safeguarding frameworks at the national and sport-specific level. Accordingly, to encourage Members to comply with safeguarding standards and best practices through supportive and voluntary mechanisms, such as information-sharing, self-assessment tools and coordinated learning or response frameworks, without implying a control, supervisory or enforcement function over Members beyond the powers conferred by the Constitution.

4. SAFEGUARDING MEASURES FOR EDSO ACTIVITIES

The EDSO implements and encourages the following safeguarding measures within the scope of its own activities and events, while completing any ad-hoc complementary safeguarding policies for EDSO Sports Events and for European NDSFs/EDSFs. A clear reference to the EDSO's mandate and activities is intended to avoid differing interpretations of the scope of application.

4.1 General Safeguarding Measures

EDSO Safeguarding Officer (SGO). The EDSO appoints a Safeguarding Officer to facilitate effective coordination and support of safeguarding activities; accordingly, the SGO should be seen as the primary point of contact for safeguarding matters within the EDSO for coordination and information purposes, and as a liaison point among European NDSFs and EDSFs.

The SGO should have educational background in relevant fields (e.g. psychology, law, social work and/or sports management), professional experience in safeguarding in sport (e.g. at least 5 years) and up-to-date safeguarding certifications or equivalent expertise with skills in trauma-informed practices, stakeholder communication, accessibility (including awareness of Deaf culture and sign language) and an understanding of investigative processes. The SGO will be line-managed by the EDSO leadership against defined key performance indicators and objectives. Accordingly, the SGO is responsible for the following tasks, which are to be understood as coordinating, advisory and supportive functions:

- drafting, implementing and reviewing safeguarding policies from a coordination and advisory perspective;
- developing and delivering education and training and fostering knowledge-sharing among European NDSFs and EDSFs;
- providing tailored guidance to European NDSFs and EDSFs for the implementation of safeguarding protocols;
- receiving reports and coordinating appropriate follow-up, aligned with confidentiality and trauma-informed approaches, without conducting disciplinary assessments or investigations;
- liaising between the EDSO Ethics Commission and, where applicable, the EDSO Legal Commission, and the individuals involved in a reported case;
- liaising with any Safeguarding Cross-Commission Working Group (or equivalent) regarding the review and discussion of safeguarding practices and areas for improvement;
- presenting regular updates and findings to the relevant commissions or the EDSO Executive Board, when necessary, for information and coordination purposes only.

Nothing in this provision is intended to confer supervisory, investigative or decision-making powers on the Safeguarding Officer. Disciplinary assessments and decisions at first instance remain exclusively within the competence of the Ethics Commission, subject to appeal in accordance with the appeal pathway defined in the EDSO Constitution and Code of Ethics.

EDSO Ethics Commission (Disciplinary Authority). In accordance with the EDSO Constitution (Article 19) and the EDSO Code of Ethics, disciplinary authority within the EDSO lies exclusively with the Ethics Commission at first instance. The review of complaints, the conduct of proceedings and the imposition of sanctions are carried out in accordance with the EDSO Code of Ethics (Articles 16–24bis) and the Constitution.

As a result, nobody may be mandated to review investigations, assess cases or take disciplinary decisions, other than the EDSO Legal Commission acting as the internal appeal body in accordance with the EDSO Constitution and Code of Ethics. This also precludes case-related review or assessment functions by other bodies, including the Safeguarding Officer.

Where safeguarding-related concerns fall within the disciplinary remit of the EDSO, they are addressed through the existing Ethics Commission procedures, including, where appropriate, referral to public authorities, and are subject to appeal in accordance with the appeal pathway defined in the EDSO Constitution and Code of Ethics (Legal Commission, thereafter CAS).

4.2 Protection and Welfare

Vulnerable Groups. The EDSO will ensure that its safeguarding policies provide enhanced protections for vulnerable groups, including children, young people, Deaf athletes and athletes with additional disabilities, during EDSO continental activities and events (European Championships, EDG, EDYG, General Assemblies, seminars, etc.).

EDSO Code of Conduct / Ethical Expectations. The EDSO will maintain and enforce behavioural expectations for all participants in EDSO events, including athletes, coaches, staff, volunteers, officials, sign language interpreters and spectators, consistent with the EDSO Code of Ethics. Any reference to disciplinary measures must therefore be read as operating exclusively through the Ethics Commission, without assigning oversight or control functions to the Safeguarding Officer or any consultative body.

4.3 Prevention and Risk Management

Safer Recruitment and Vetting. The EDSO will use its best endeavours to enforce appropriate vetting procedures for all individuals directly involved in EDSO activities. This may include criminal record checks and reference verification to prevent the involvement of known offenders and to ensure that individuals working with children and vulnerable adults are suitably qualified and safe, especially where roles will involve direct contact with children or vulnerable persons, in line with applicable legislation.

Training and Education on Safeguarding. All EDSO staff, volunteers and relevant stakeholders will receive mandatory safeguarding training to recognise signs of abuse and understand the protocols for reporting concerns. The EDSO SGO will lead these activities in coordination with and with advisory input from relevant commissions. Training shall take into account accessibility needs, including International Sign where appropriate.

Awareness Campaigns. The EDSO will promote safeguarding awareness through campaigns, educational materials and workshops during its events and within its member federations. Accordingly, the EDSO General Assemblies, seminars and events will be used as platforms to provide updates, promote learning opportunities and encourage knowledge-sharing.

Risk Assessment Procedures. The EDSO SGO will regularly conduct risk assessments for EDSO events and activities, ensuring that potential safeguarding risks are identified and addressed within the EDSO's mandate. This includes evaluating the physical, emotional, psychological and communication-related safety of participants.

4.4 Reporting and Response Mechanisms

To ensure legal certainty and full alignment with the EDSO Constitution and the EDSO Code of Ethics, safeguarding-related concerns should be managed through a structured referral process. Safeguarding reports may be submitted through multiple accessible channels, including an anonymous reporting platform (where established) and the reporting channels provided for under the EDSO Code of Ethics (to the EDSO Secretariat / Ethics Commission). The receipt and coordination of such reports do not constitute a substantive assessment. Where a safeguarding concern potentially falls within the disciplinary remit of the EDSO, the matter shall be formally and without delay referred to the Ethics Commission, which remains exclusively competent at first instance to assess the case, to mandate any necessary investigation, and to decide on the case in accordance with the EDSO Constitution and the EDSO Code of Ethics, subject to appeal in accordance with the appeal pathway defined therein. Operational safeguarding or response units, or other duly mandated persons or bodies, may support the collection of factual information and the

implementation of immediate protective measures. Such units or persons do not constitute investigative bodies in their own right and act solely in support of, and under the authority of, the Ethics Commission, and in strict confidentiality.

Response Mechanisms. The EDSO SGO will take immediate action upon receiving any safeguarding reports, which is limited to receiving reports, providing initial support, and initiating the necessary procedural steps, to ensure concerns are promptly, confidentially and appropriately addressed. Such action does not include conducting investigations, making substantive case assessments, or taking disciplinary decisions, as these responsibilities lie exclusively with the Ethics Commission at first instance.

Accessible Reporting and Protection Mechanisms. Reporting mechanisms will be available and clearly signposted, with due regard to accessibility (including International Sign and written English). Adequate platforms for reporting and protection mechanisms will be implemented. Ad-hoc complementary safeguarding policies will apply during EDSO events, including appropriate whistleblower protection measures, ensuring that individuals can report concerns without fear of adverse consequences.

Provisional Safeguarding Measures. Where necessary to protect individuals, ensure the integrity of EDSO activities or prevent further harm, provisional safeguarding measures may be adopted on a temporary basis in accordance with the EDSO Code of Ethics (Article 22 – Provisional Measures). Such measures are strictly preventive and protective in nature and do not constitute disciplinary sanctions, nor do they prejudge the outcome of any disciplinary proceedings. Provisional measures may include, in particular, immediate protective or organisational actions taken in the context of EDSO activities or events (e.g. temporary suspension of accreditation, separation of parties, adjustment of roles or access), where justified by the circumstances. The assessment of disciplinary responsibility, the conduct of proceedings and the imposition of sanctions remain exclusively within the competence of the Ethics Commission at first instance, subject to appeal.

Investigative Process. The EDSO SGO does not conduct investigations into alleged incidents of harassment and abuse, but acts in a coordinating and supportive capacity, including receiving reports, ensuring initial safeguarding measures, and facilitating the referral of concerns using trauma-informed approaches. Investigations and substantive case assessments are carried out under the authority of the Ethics Commission at first instance, in accordance with the EDSO Constitution and the EDSO Code of Ethics. Any disciplinary decision taken within the EDSO framework is subject to appeal in accordance with the appeal pathway defined therein. Investigations are conducted in line with principles of due process, fairness, impartiality, proportionality, trauma-informed practice and the right to be heard, and require appropriate safeguarding-specific expertise and training. Where necessary, concerns may be referred, through the established Ethics Commission procedures, to competent public authorities.

Involvement of Public Authorities and CAS. In compliance with applicable laws, the EDSO will cooperate with relevant public authorities in cases that may involve criminal conduct. The Court of Arbitration for Sport (CAS) is not a public authority and is involved solely as an external appeal body in disciplinary matters, in accordance with the EDSO Constitution (Article 21) and following exhaustion of the internal appeal pathway defined in the Code of Ethics. Any reference to CAS should therefore be understood exclusively in this context.

Victim, Emotional and Psychological Support. In cases of abuse or safeguarding concerns, the EDSO SGO may facilitate coordination with relevant stakeholders to support access to appropriate assistance for affected persons, including counselling, medical care and psychological support, where available, and with due regard to communication access. Such coordination is limited to facilitating access to support services and does not involve assessment, decision-making or

operational control. Where appropriate, this facilitative support may extend to other parties involved, with the aim of promoting well-being and minimising harm.

4.5 Monitoring, Evaluation, Learning and Accountability

Regular Review and Data Collection. The EDSO SGO and the EDSO Secretariat shall collect and analyse safeguarding-related data arising from EDSO activities in order to identify trends, emerging risks and potential systemic barriers, with strict respect for confidentiality and data protection requirements. Findings shall be reported, where appropriate, to the relevant commissions and the EDSO Executive Board.

The safeguarding framework shall be subject to periodic review at least every two years, or following a significant case, to ensure that lessons learned and identified structural gaps are appropriately addressed and integrated into policy and practice.

EDSO Oversight and Accountability. The EDSO, including its staff, officers, commissions and designated safeguarding bodies, shall be accountable for the effective implementation and enforcement of this Safeguarding Policy within their respective mandates. Any failure to fulfil safeguarding responsibilities or to act in accordance with this Policy may result in measures pursuant to the applicable EDSO Constitution, Code of Ethics and procedural regulations.

5. RESOURCE ALLOCATION

The EDSO allocates financial resources to ensure the effective implementation and sustainability of safeguarding policies and initiatives, subject to available resources and budgetary approval by the Executive Board / General Assembly in accordance with Article 20 of the Constitution. Accordingly, appropriate internal review and reporting mechanisms will ensure that resources are allocated and used effectively and transparently, with adjustments foreseen based on feedback and evolving safeguarding requirements.

Thus, the EDSO commits to allocating funds, subject to available resources, for the appointment of a dedicated SGO with the necessary qualifications and experience, who is expected to be supported by ad-hoc independent experts and additional staff when necessary.

Additionally, subject to available resources and budgetary approval, the EDSO may support educational programmes, capacity-building and awareness activities, access to independent safeguarding expertise and legal advice, as well as appropriate measures to facilitate victim support and the handling of safeguarding-related information, with due regard to accessibility.

TERMINOLOGY AND DEFINITIONS

The EDSO uses the 2024 IOC Consensus Statement on Interpersonal Violence and Safeguarding in Sport definitions, supplemented by additional examples that are consistent with and aligned to the IOC Consensus Statement, and adapted where relevant to the Deaf sports context.

INTERPERSONAL VIOLENCE. The intentional use of physical force or power, whether threatened or actual, against oneself, another person, or against a group or community, that either results in or has a high likelihood of resulting in injury, death, psychological harm, maldevelopment or deprivation. Interpersonal violence involves the intentional use of physical force or power against other persons by an individual or a small group of individuals. It can occur online, be perpetrated by different actors, and take different forms.

Related terminology. Violence, harm, abuse, harassment, maltreatment, unethical behaviours, mobbing, non-accidental violence, human rights violation, abusive leader behaviours, gender-based violence, gender-based harassment, violence against women, homophobia, microaggressions, transgressive behaviours.

Example. An Executive Board member physically or verbally threatens another member during a meeting, leading to psychological harm and humiliation. This could also occur online, such as in group chats where threatening messages are sent.

SEXUAL VIOLENCE AND HARASSMENT. A type of interpersonal violence in sport, which refers to any sexual act, attempt to obtain a sexual act, unwanted sexual comments or advances, or acts to traffic, or otherwise directed against a person's sexuality using coercion, by any person regardless of their relationship to the victim, in any setting including, but not limited to home and work. The different forms of sexual violence can occur both online and in person.

Related terminology. Sexual harassment, sexual abuse, sexual assault, sexual exploitation, online misogyny, gender harassment.

Example. A member of an EDSO Commission persistently makes unwanted sexual advances towards another member, including suggestive comments and inappropriate touching at EDSO events.

PHYSICAL VIOLENCE. A type of interpersonal violence in sport, which refers to an act attempting to cause, or resulting in, pain and/or physical injury. Physical violence includes among others beating, burning, kicking, punching, biting, maiming, killing, use of objects or weapons.

Related terminology. Physical abuse, physical aggression.

Example. An EDSO Executive Board member throws a notepad at another member in frustration at an EDSO meeting or event, causing physical injury.

PSYCHOLOGICAL VIOLENCE (or ABUSE). A type of interpersonal violence in sport which involves the regular and deliberate use of a range of words and non-physical actions used to manipulate, hurt, weaken or frighten a person mentally and emotionally, and/or distort, confuse or influence a person's thoughts and actions within their everyday lives, changing their sense of self and harming their well-being. It could occur online or in person.

Related terminology. Psychological abuse, emotional abuse, verbal abuse and virtual maltreatment.

Example. An EDSO senior member of staff continuously humiliates a junior member of staff by yelling derogatory comments about his/her performance in front of colleagues, eroding self-confidence and mental health.

NEGLECT. A type of interpersonal violence in sport which refers to the failure to provide (a vulnerable person) with adequate standards of nutrition, medical care, clothing, shelter or supervision to the extent that the health or development of the (vulnerable person) is significantly impaired or placed at serious risk. In other words, neglect occurs when someone is left uncared for over a long time. In the Deaf sports context this includes failure to ensure appropriate communication access (e.g. qualified sign language interpretation) where required for safety and well-being.

Example. The EDSO fails to provide an attendee of the EDSO General Assembly with adequate medical care after an injury during the event, or fails to ensure necessary interpretation for safety briefings, leading to physical harm or prolonged recovery.

BULLYING. Additional forms of aggression related to interpersonal violence in sports that can be defined as intentional and aggressive behaviour occurring repeatedly against a victim where there is a real or perceived power imbalance, and where the victim feels vulnerable.

Example. Repeated exclusion of a Deaf athlete from team communications or deliberate withholding of interpretation in a way that isolates and demeans the individual.

Entry into force and review. This Policy enters into force upon approval by the EDSO Executive Board / General Assembly on [DATE] and is published on the EDSO website. It shall be reviewed at least every two years or following a significant case, in line with Section 4.5.

In case of any conflict between this Policy and the EDSO Constitution or the EDSO Code of Ethics, the Constitution and the Code of Ethics shall prevail.