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CREATIVA SECURITY CONSULTING – EUOS PROTECTION

*INSTITUTIONAL FRAMEWORK FOR SAFE, LAW-COMPLIANT, AND
DIGNIFIED YOUTH ENVIRONMENTS ACROSS EUOS PROPERTIES*

CREATED BY
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Care to Change the World



Table of Contents

INTRODUCTION.....	2
CHAPTER 1 — LEGAL AND ETHICAL PRINCIPLES	2
CHAPTER 2 — SAFEGUARDING GOVERNANCE STRUCTURE	3
CHAPTER 3 — SUPERVISORY AND PROTECTIVE PRESENCE	3
CHAPTER 4 — PREVENTIVE SAFEGUARDING STANDARDS	4
CHAPTER 5 — INCIDENT MANAGEMENT, REPORTING, AND INTERVENTION.....	5
CHAPTER 6 — INTEGRATION WITH SECURITY OPERATIONS	5



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INTRODUCTION

This Framework defines the safeguarding doctrine applicable to all young residents, students, trainees, and visitors within EUOS environments. It establishes Creativa Center’s legal, ethical, and institutional duties as the operator of youth-related spaces, ensuring that its residential, educational, communal, and recreational environments uphold the rights of the child under Swedish law, EU law, and the United Nations Convention on the Rights of the Child (UNCRC), which has been incorporated into Swedish domestic law.

Sweden affirms that every child has the right to grow up in safe, secure, and violence-free conditions. This obligation applies to all entities working with children, including private operators of residential and educational settings. EU law reinforces these obligations through Article 24 of the EU Charter of Fundamental Rights, which states that children have the right to protection and care necessary for their well-being, and that their best interests must be a primary consideration in all actions relating to them.

EUOS environments therefore require a safeguarding architecture that integrates:

- legal compliance with Swedish Social Services Act (SoL) and Care of Young Persons Act (LVU) safeguards, which mandate protective intervention thresholds and municipal reporting obligations;
- GDPR and EU children’s data-protection norms, providing heightened protections for minors’ personal information;
- operational structures that ensure preventive safety, risk identification, and proportionate response.

This Framework is binding for all EUOS operators, staff, volunteers, contractors, and licensed security personnel.

CHAPTER 1 — LEGAL AND ETHICAL PRINCIPLES

The safeguarding obligations within EUOS derive from a comprehensive legal matrix. Swedish law establishes that children are entitled to protection, care, safety, and development, and that the best interests of the child must guide all decisions affecting them. Sweden’s Social Services Act (SoL) mandates municipalities—and, by extension, operators in contact with children—to act in the child’s best interests and to notify social services when harm or suspected harm may occur.

Where risks reach thresholds of serious endangerment, the Care of Young Persons Act (LVU) empowers authorities to intervene, providing a statutory basis for compulsory protective care. EUOS personnel must therefore operate under a clear duty to detect indicators of neglect, violence, exploitation, or self-harm and escalate promptly through defined reporting channels.

At the EU level, the Charter of Fundamental Rights affirms child rights to protection, participation, and dignity (Art. 24), requiring all private institutions—including private residential facilities—to treat children as rights-holders with views that must be considered in accordance with their maturity. EU



child-safety initiatives further emphasise risk-mitigation in digital environments, privacy-by-design measures for minors, and protection from harmful online practices.

GDPR applies with heightened stringency when processing the personal data of minors. Supervisory bodies, including the European Data Protection Board, affirm that minors require “special protection” and that controllers must implement compliant age-assurance, parental-consent mechanisms, transparency obligations, and children-specific risk assessments.

These legal principles form the ethical backbone of EUOS safeguarding. Creativa’s duty is to ensure that every youth-related activity, building, partnership, and programme conforms to the best-interests principle, proportionality, dignity, and the right to be heard.

CHAPTER 2 — SAFEGUARDING GOVERNANCE STRUCTURE

The safeguarding governance structure consists of three tiers: the **EUOS Safeguarding Board**, the **Designated Child Protection Officers**, and the **Operational Reporting Network**.

The Safeguarding Board functions as the oversight and policy body responsible for ensuring compliance with Swedish child-protection legislation and EU guidance on minors’ safety. The Board’s mandate includes the approval of safeguarding protocols, review of annual safeguarding reports, oversight of high-risk cases, and cooperation with municipal social services where required under SoL and LVU. Swedish authorities require that institutions take proactive measures to identify harm and work collaboratively with social services, who hold statutory responsibility for child welfare decisions.

Designated Child Protection Officers (CPOs) serve as the internal points of contact for all safeguarding matters within EUOS. They maintain direct communication lines with municipal social services and, where necessary, the police. They ensure that concerns are logged, assessed, escalated, and documented in accordance with legal thresholds and procedural safeguards. Their responsibilities align with Sweden’s long-standing child-rights doctrine, which requires attentive listening to children, prioritisation of their well-being, and appropriate intervention when risk indicators appear.

The Operational Reporting Network consists of supervisors, educators, health professionals, security personnel, volunteers, and contractors who have statutory obligations to report concerns. Swedish law requires that professionals working with children notify social services immediately when they suspect a child may be at risk. This reporting duty is non-delegable and is reinforced through training, annual certification, and continuous learning modules.

CHAPTER 3 — SUPERVISORY AND PROTECTIVE PRESENCE

Supervisory and protective presence in EUOS environments integrates educational, pastoral, safeguarding, and security mandates within a unified legal-compliant framework. Sweden’s safeguarding structure emphasises giving children security, stability, emotional support, and a living environment free from neglect or violence.

Supervisors and mentors provide day-to-day oversight, relationship-building, and behavioural guidance. Their function aligns with the Social Services Act’s preventive character, which encourages supportive measures to prevent escalation into compulsory interventions. They promote safe peer interactions, monitor early indicators of bullying or isolation, and ensure inclusive, respectful environments.



Safety Officers operate as unarmed professionals trained to support safeguarding protocols, observe behavioural and environmental risks, and coordinate with CPOs during incidents. Their role is distinguished from that of licensed guards, who operate under private-security regulations but must adapt their conduct to child-sensitive norms and the rights-based requirements of the UNCRC and EU Charter.

Licensed guards present on EUOS properties carry out access control, patrol, and incident-response duties, but always within the constraints imposed by Swedish law—where guarding is a regulated profession and must be conducted proportionately, without coercive powers beyond lawful self-defence. Their presence must be trauma-aware, non-intimidating, and fully subordinated to safeguarding priorities.

Collectively, these roles maintain an environment that is physically secure, emotionally supportive, developmentally respectful, and legally compliant.

CHAPTER 4 — PREVENTIVE SAFEGUARDING STANDARDS

Preventive safeguarding within EUOS environments consists of structural, operational, environmental, and behavioural measures designed to protect minors proactively and to reduce the likelihood of harm, abuse, bullying, or neglect. Sweden’s safeguarding doctrine emphasises early intervention, support, and preventive action as the most effective means of protecting children and ensuring a secure upbringing. Municipal social services frameworks reinforce this by mandating preventive support work with children and families prior to any compulsory measures under the Social Services Act (SoL).

Access control systems are designed around proportionality and child protection. Entry to youth residential areas is limited to authorised staff and verified visitors, with authentication requirements that respect minors’ privacy rights while meeting the duty to protect under Article 24 of the EU Charter of Fundamental Rights. CCTV use must comply with GDPR’s requirements for lawful basis, minimisation, purpose limitation, and clear transparency obligations, including for minors who merit “special protection” in data processing contexts.

Environmental design incorporates safe communal spaces, gender-appropriate sleeping areas, discrete supervision zones, and controlled nighttime routing, reflecting the principle that children must grow up in safe and secure environments free from violence and exploitation. Lighting, visibility, and elimination of blind spots are prioritised to prevent bullying, harassment, or concealed misconduct.

Night-time safety protocols require continuous supervisory presence, unarmed safety officers trained in trauma-informed interaction, and escalation channels to child protection officers. These protocols mirror Sweden’s emphasis on the right of every child to safety and protection from abuse, as reflected in national child-protection policies and social-services guidance.

Anti-bullying frameworks address both physical and digital spaces, recognising the EU’s findings that online platforms introduce unique safeguarding threats to minors, including cyberbullying, grooming, harmful content, and manipulative technological design. Staff must monitor interpersonal dynamics, respond to early signs of exclusion, and uphold the Swedish principle that the best interests of the child must guide all responses to peer conflict.

Substance-misuse controls reflect Swedish social-services priorities, which include early detection of substance abuse and supportive interventions for at-risk adolescents. EUOS therefore prohibits



possession or consumption of alcohol, narcotics, or inhalants within youth environments and cooperates with municipal social services when indicators of self-harm or addiction emerge.

CHAPTER 5 — INCIDENT MANAGEMENT, REPORTING, AND INTERVENTION

Incident management within EUOS environments reflects statutory duties under Swedish child-protection law. When a child is suspected to be at risk, staff have a legal obligation to notify municipal social services immediately, regardless of internal assessments, and must cooperate with investigations. Where severe risk exists—neglect, violence, sexual abuse, or self-destructive behaviour—LVU empowers authorities to intervene with compulsory protective care.

Emergency response protocols distinguish between urgent (life-threatening or harm-imminent) and critical but non-immediate situations. Urgent incidents require immediate activation of emergency services, guardian notification where applicable, and escalation to the Child Protection Officer. EUOS personnel must respect procedural safeguards outlined in Swedish law, including the child’s right to be heard and supported during crisis response.

Missing persons protocols require coordinated search procedures, immediate police notification, and contemporaneous documentation. Swedish authorities underscore that children’s safety and welfare are paramount, and EU Charter principles require the best interests of the child to guide all related decisions.

Psychological support pathways recognise that exposure to trauma, conflict, or exploitation requires specialised intervention. Sweden’s child-welfare system emphasises multidisciplinary support—with social services, child psychiatry (CAPS), and safeguarding specialists collaborating to restore stability. EUOS integrates these services via referral protocols activated directly by Safeguarding Officers.

Cross-agency cooperation implements Sweden’s strong collaborative model for child protection, which relies on coordinated efforts between schools, health care, law enforcement, and municipal social services to ensure holistic safeguarding outcomes. EUOS therefore maintains predefined communication channels and information-sharing templates that comply with GDPR when processing the personal data of minors, who receive heightened protection under EU law.

All incidents are recorded using factual, minimally intrusive, and GDPR-compliant methods, aligned with IMY standards for data minimisation, lawful basis, secure storage, and child-appropriate transparency measures.

CHAPTER 6 — INTEGRATION WITH SECURITY OPERATIONS

Safeguarding and security are mutually reinforcing but legally and operationally distinct. Security functions (access control, patrols, incident containment) must never overshadow or distort safeguarding imperatives grounded in the rights of the child. The EU Charter requires that children’s best interests be a primary consideration in all decisions by private institutions.

Security personnel operating in EUOS environments must therefore adhere to a **child-sensitive, de-escalatory, and non-militarised** posture. Their authority is limited to lawful private-security functions under Swedish law, which prohibit coercive acts beyond lawful self-defence. Security officers must coordinate with Safeguarding Officers and Child Protection Officers for any incident involving minors.



Boundaries of responsibility ensure that:

- safeguarding officers lead all child-centred casework and welfare assessments;
- security officers provide physical-environment safety support but do not perform welfare interviews, behavioural assessments, or any action that substitutes for child-protection functions;
- any incident with child-protection implications is escalated directly to the CPO and, when required, reported to municipal social services under the SoL mandatory-reporting duty.

Data-flow boundaries further reflect children’s heightened privacy rights under GDPR and EU children’s data-protection guidance. Security-generated data (e.g., CCTV footage or access logs) may be shared with safeguarding authorities only where lawful basis exists, where strictly necessary, and with strict minimisation.

Integration therefore occurs through coordination, shared protocols, and complementary roles, but never through the merging of safeguarding and security mandates.

CLOSING STATEMENT

This Framework establishes EUOS as a legally compliant, ethically grounded, and child-centred environment. It reflects Sweden’s long-standing commitment to protecting the rights, safety, and dignity of every child, as well as the EU’s fundamental-rights architecture and GDPR’s heightened protections for minors. It creates a governance model that is preventive rather than reactive, supportive rather than punitive, and collaborative rather than hierarchical.

In adopting this Framework, Creativa affirms that every child within EUOS is entitled to a safe, nurturing, rights-respecting environment—and that safeguarding is not merely a statutory requirement, but a foundational value of the institution’s social mission.