

Child Protection **Policy Statement**

Prepared By:
SYNCNIFY (France)



1. INTRODUCTION

Document Control	Details
Policy owner	SYNCNIFY
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Legal entity name and registered address	SYNCNIFY 34 Avenue des Champs Elysées, 75008, Paris, France
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Review cycle	Annually and following significant changes or incidents
Safeguarding Lead and deputy	Apostolos Altiparmakis – Dimitrios Pavlidis

SYNCNIFY adopts this Child Protection Policy with effect from 1 January 2022 as part of its institutional commitment to ensuring the safety, dignity and well-being of children who may participate in, or be affected by, its activities. Responsibility for the effective implementation of the policy rests with the authorised governing body or designated director, who is expected to ensure that appropriate human, organisational and financial resources are available to support its application across the organisation.

This responsibility includes maintaining accurate and up-to-date organisational and safeguarding contact information, ensuring that reporting and escalation procedures remain accessible and operational, and periodically reviewing the practical arrangements through which safeguarding concerns are managed. All staff members, external experts, volunteers, contractors and other associates involved in activities that may include contact with children must receive an appropriate briefing on their safeguarding responsibilities before the activity begins. Such briefings should cover expected standards of conduct, relevant reporting procedures and the specific safeguarding arrangements applicable to the activity concerned.

At project level, each initiative involving the direct or indirect participation of children must prepare a local safeguarding plan before any child participation takes place. The plan should reflect the context in which the activity is implemented and identify relevant responsibilities, foreseeable risks, reporting arrangements and appropriate preventive measures. Particular attention should be given to activities involving direct interaction with children, the collection or use of personal data, photography or audiovisual material, online participation, travel, events or engagement with external partners and service providers.

This policy establishes the minimum organisational requirements that SYNCNIFY applies to the protection of children within its own activities and projects. Its adoption should not, however, be interpreted as constituting external accreditation, independent certification or automatic evidence of eligibility or compliance under a specific European Union funding programme or call for proposals. Safeguarding obligations may vary depending

on the nature of the action, the funding instrument, the countries involved and the specific contractual requirements applicable to a project.

1. POLICY STATEMENT

1.1 Purpose and scope

A child is any person under 18 years of age. If age is uncertain, the person is treated as a child until appropriately verified. This policy applies to SYNCNIFY's directors, employees, volunteers, interns, consultants, trainers, researchers, contractors and other associates. Partners and service providers must meet the contractual safeguards described in this policy. The policy covers face to face and online contact, project design, research, workshops, educational activities, events, visits, travel, dissemination, photography, platforms and data processing. It also applies where children are affected indirectly, including as household members of adult participants, users of project outputs or subjects of stories and images. An activity described as adult education is not exempt where children are involved or affected.

1.2 Principles

- The child's best interests guide all safeguarding decisions. A child's safety takes priority over project delivery, reputation, deadlines and publicity.
- Every child has equal entitlement to protection, irrespective of disability, sex, gender, sexual orientation, ethnicity, nationality, migration status, religion, language or family circumstances.
- Children receive accessible information, can express their views and can decline or withdraw from participation without punishment. Their views inform decisions according to age and understanding.
- Safeguarding is everyone's responsibility. Concerns must be reported even when evidence is incomplete. Proof is not required to raise a concern.
- SYNCNIFY prohibits abuse, exploitation, neglect and retaliation against anyone who raises a concern in good faith. Confidentiality is protected through necessary and proportionate information sharing.

1.3 Harm covered by the policy

Physical abuse includes assault, corporal punishment and dangerous restraint. Emotional abuse includes threats, humiliation, discrimination, intimidation and persistent rejection. Sexual abuse and exploitation include sexual contact, sexualised communication, grooming, coercion and using a child in sexual material. Neglect includes failing to provide necessary supervision, care or protection within the organisation's responsibilities. The policy also covers bullying and harmful behaviour between children; online harassment, grooming and sexual extortion; trafficking and commercial exploitation; unsafe research or activities; and harmful disclosure of a child's identity, image, location or personal information. Sexual activity between a SYNCNIFY representative and a child is prohibited regardless of a lower local age of sexual consent or a mistaken belief about age.

1.4 Publication and legal context

After approval, SYNCNIFY publishes this policy on its website and supplies it to personnel, partners and relevant project stakeholders. Children and caregivers receive a concise, accessible explanation in a language and format they understand. Translations and disability related adaptations are provided where needed. Implementation is informed by the UN Convention on the Rights of the Child, particularly Articles 3, 12, 19 and 34, applicable national child protection law, the GDPR where applicable, and relevant EU grant obligations. National duties to report and authority referral routes are verified locally. No internal procedure may delay an urgent or legally required external report.

2. PEOPLE

2.1 Responsibilities and authority

The governing body or authorised director has overall accountability. It approves this policy, appoints a Safeguarding Lead and deputy, assigns a senior management safeguarding sponsor, provides resources and receives implementation reports. The senior sponsor may also be the Lead in a small organisation, but an independent escalation route must remain available. The Safeguarding Lead maintains the reporting system, receives and records concerns, coordinates immediate protective action and referrals, supports project teams, arranges training and monitors implementation. The deputy acts when the Lead is absent or conflicted. These roles coordinate protection; they do not replace police, child protection services or qualified investigators. Project managers assess risks, establish local arrangements, verify partner readiness, brief activity teams and stop activities when safeguards are inadequate. Every staff member and associate follows the code of conduct and reports concerns. Communications and data personnel apply the image, publication and privacy controls in section 3.

2.2 Safer recruitment and assignment

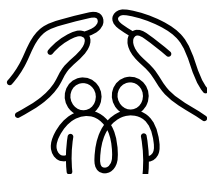
Before appointing anyone to a role involving contact with children or access to identifiable child data, SYNCNIFY assesses the role's risks. Role descriptions and recruitment notices state safeguarding responsibilities. Selection includes identity verification, examination of relevant experience and unexplained employment gaps, safeguarding interview questions and at least two references where available, including a recent employer or supervisor where appropriate. Relevant criminal record or barred list checks are obtained where lawful, available and appropriate to the role and country. Checks must not be treated as a guarantee of safety. Where a check cannot legally or practically be obtained, the Lead records the reason, alternative checks, access restrictions and approval. No person receives unsupervised access before required screening and induction are complete. Necessary vetting records are handled lawfully and with restricted access.

2.3 Training and conduct commitments

All personnel receive induction on this policy, boundaries, recognising harm, disclosure handling and reporting before child related work. They sign the conduct declaration in Annex C. Refresher training takes place at least annually and after significant changes. Leads and managers receive additional training on referrals, risk assessment and managing allegations. Training attendance and understanding are recorded.

2.4 Partners and suppliers

Before engagement, SYNCNIFY assesses each partner's safeguarding capacity, policy, reporting routes, staffing and relevant experience. Written agreements require compliance with this policy or an equivalent policy providing no lower protection, appointment of a focal point, prompt reporting of concerns connected with joint activities, cooperation with lawful referrals and monitoring, and equivalent obligations for subcontractors. Agreements specify who supervises children, receives reports, holds records and leads immediate protective action in each country. SYNCNIFY provides proportionate support to address gaps, with dated corrective actions. Child related work must not begin or continue where essential safeguards are absent. Serious or unresolved breaches may lead to suspension or termination in accordance with the agreement.



3. PROCEDURES FOR PREVENTION

3.1 Project safeguarding plan and risk assessment

Before an activity involving or affecting children, the project manager and Lead approve a documented assessment and local plan. They consult children and caregivers safely where appropriate, map local child protection services, police, emergency care and reporting duties, and identify accessible referral and support routes. The plan records supervision, responsible adults, consent, transport, venue safety, accessibility, digital controls, information handling and complaints arrangements. Risks are assessed for each activity, location, participant group and partner. Consider disability, language barriers, migration related vulnerability, power differences, peer behaviour and mixed age groups. Assign an owner and deadline to every mitigation and review residual risk. Unacceptable risks require redesign, postponement or cancellation. Review the assessment when circumstances change and after incidents or participant feedback. Budget for training, suitable supervision, accessible communication and support.

3.2 Supervision and physical activities

Use at least two screened adults for group activities wherever practicable. Set adult to child ratios according to age, needs, activity and local rules. One to one contact must be necessary, authorised, observable and recorded; avoid closed or isolated spaces. Emergency exceptions require immediate safety measures and prompt reporting to the Lead. Unscreened visitors never supervise children alone. Record attendance, emergency contacts, authorised collection and missing child arrangements. Check venue access, toilets, accessibility and emergency exits. Personal care must follow an agreed plan respecting privacy, dignity and professional boundaries. Travel requires written arrangements for permissions, supervision, safe transport, accommodation and emergency response. Adults must not share bedrooms with unrelated children. Private transport by one adult with one child is avoided; any necessary exception must be authorised, risk assessed and documented, or reported promptly if an emergency.

3.3 Participation and research

Obtain informed permission from the legally authorised caregiver where required and the child's affirmative agreement appropriate to age and understanding. Explain the activity, foreseeable risks, voluntary participation, recording, use of information and how to complain. A child's refusal or distress stops participation even if caregiver permission exists. Verify applicable consent rules; consent does not remove the organisation's duty of care. Research and consultation must use age appropriate methods, avoid unnecessary questions about traumatic experiences and provide a safe way to stop. Obtain ethics approval where required. Do not promise absolute confidentiality: explain protection related limits. Participation incentives must not pressure children to join or disclose sensitive experiences.

3.4 Digital contact and communication

Use approved organisational accounts and moderated platforms with suitable privacy settings and access controls. Avoid private messaging through personal accounts, disappearing messages and unmonitored contact. Necessary individual communications must use approved channels and be visible to an authorised colleague, with caregiver involvement where appropriate and safe. Explain online behaviour rules and how to report concerns; respond to cyberbullying and harmful peer conduct. Assess external platforms, age restrictions, recording features and third party data use before adoption. Never upload identifiable child information, safeguarding records or child images to public generative AI tools. Any other AI use involving children requires prior safeguarding and privacy assessment, appropriate permissions and human oversight.

3.5 Images and personal information

Photography, recording and publication require separate, informed permissions and the child's agreement, specifying channels and intended use. Refusal must not exclude a child from activities. Use dignified images; avoid identifying vulnerable children, exact locations, geotags, school identifiers or sensitive stories. Do not use private devices without explicit organisational authorisation and secure transfer and deletion arrangements. Process only necessary personal data under an identified lawful basis, with appropriate privacy notices and additional conditions for sensitive information. Consent is not assumed to be the lawful basis for safeguarding referrals. Apply access controls, secure storage and transfer, a documented retention schedule and lawful deletion. Keep safeguarding case records separate from routine project files; project audit retention rules must not automatically determine case retention. Consult the designated privacy responsible person about data breaches and mandatory notifications.

4. PROCEDURES FOR REPORTING AND RESPONSE

4.1 Immediate action and internal reporting

If a child faces immediate danger, contact local emergency services and arrange urgent medical assistance. In the EU, 112 is the emergency number. In France, 119 provides the child protection reporting and advice route; use emergency services for serious or imminent danger. For other countries, use the verified local routes in Annex A. Never wait for internal authorisation before making an urgent or legally required report. Any concern, disclosure, suspicion, allegation or conduct breach must be reported to the Lead immediately and, at the latest, within 24 hours of becoming aware. This is SYNCNIFY's internal maximum, not a replacement for earlier legal deadlines. Report orally if necessary and follow with a factual record using Annex B as soon as safe. Reports may come from children, caregivers, staff, partners or the public, including anonymously. If the Lead is unavailable or implicated, report to the deputy or independent senior escalation contact. If senior management is implicated or internal channels are unsafe or unresponsive, report directly to the appropriate external authority. Reporting contacts must be actively monitored during activities, including travel and out of hours work. Nobody needs to prove abuse before reporting.

4.2 Receiving a disclosure

- Listen calmly and take the child seriously. Tell them they did the right thing by speaking and that the harm is not their fault.
- Do not promise secrecy. Explain that information will be shared only with people who need it to help keep them safe.
- Ask only minimal, open questions needed for immediate safety. Do not investigate, suggest answers, repeatedly question the child or confront the alleged person.
- Record the child's own words, observations, date, time and actions as soon as possible. Separate facts from interpretation. Preserve relevant evidence securely; do not copy or circulate suspected illegal sexual images of children.

4.3 Lead response and external referral

The Lead or deputy assesses immediate safety and urgent referral needs on receipt of the report, normally the same day. Record decisions, reasons, authority contacts and protective actions. Refer promptly to competent child protection services or police where required by law or indicated by risk; seek specialist advice if uncertain. An internal assessment never substitutes for a statutory investigation. Arrange a named support contact and suitable medical, psychological or social support. Explain next steps to the child in an accessible way. Inform caregivers unless doing so could increase risk or compromise an authority response; obtain

specialist guidance where necessary. Share only necessary information with those responsible for protection. Monitor safety and support until an appropriate handover or closure is documented.

4.4 Allegations against personnel and partners

Protect the child immediately, including restricting the alleged person's contact or access when necessary. Such interim action is precautionary and does not establish guilt. Protect confidentiality and fair process. An appropriately qualified, impartial person may conduct an internal investigation only in coordination with competent authorities so it does not interfere with their work. Depending on findings and applicable employment or contractual rules, action may include additional controls, disciplinary measures, dismissal, termination or referral to authorities. A person's resignation does not end the safeguarding response. Notify project coordinators and funders where required by the grant agreement or law, sharing only necessary information; routine consortium reports must exclude identifiable case details.

4.5 Complaints and protection from retaliation

Children may report through a trusted adult, verbally, in writing or using accessible alternatives. Explain channels before participation and check that they can be used privately. No good faith reporter or affected child may suffer retaliation or loss of project opportunities. Complaints about handling go to the independent escalation contact or an external authority. Review handling independently where possible and communicate appropriate outcomes without disclosing confidential information.

5. ACCOUNTABILITY

5.1 Monitoring and records

The Lead maintains restricted registers of concerns, training, signed conduct commitments, recruitment checks, partner assessments and activity risk approvals. Management reviews implementation at least annually and after serious incidents. Monitoring considers completion of induction and screening, risk controls, reporting accessibility, timeliness of responses, overdue corrective actions and feedback from children and caregivers. A low number of reports must not be treated as proof of safety. Each project includes safeguarding checks in its management and partner review arrangements. Children and caregivers are offered safe feedback opportunities that do not require disclosure in a group. The governing body receives anonymised findings and approves corrective actions, responsible persons and completion dates. Public annual reporting includes proportionate information on safeguarding progress and learning without identifying children, reporters or alleged persons.

5.2 Review and independent evaluation

Review this policy and related practice at least annually, and earlier after a serious incident, a legal change, significant new activity or evidence that controls are ineffective. Arrange a formal external evaluation or audit of policy and practice at least every three years. Include children's and partners' feedback through safe, accessible methods. Update procedures, training and resources in response to findings and keep version and approval records.



5.3 Approval declaration

This policy is adopted by SYNCNIFY with effect from 1 January 2022. SYNCNIFY commits to providing the authority, staffing and resources necessary for implementation. The authorised representative's details and signature may be recorded below.

Approving authorised director: _____

Name and role: _____

Signature: _____ Approval date: 1 January 2022

Effective date: 1 January 2022 | Review cycle: annually

Sources informing the policy

1. Keeping Children Safe. The International Child Safeguarding Standards.
<https://www.keepingchildrensafe.global/international-child-safeguarding-standards/>
2. United Nations. Convention on the Rights of the Child. <https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child>
3. European Union. Regulation (EU) 2016/679. <https://eur-lex.europa.eu/eli/reg/2016/679/oj>
4. French public administration. Enfant en danger comment le signaler. <https://www.service-public.gouv.fr/particuliers/vosdroits/F781>
5. Local legal requirements, reporting contacts and referral information must be verified for each project location and reviewed regularly.