

CHILD PROTECTION POLICY

Our company Ludicius, whose head office is located at 46 rue de Strasbourg, 44000 Nantes, France hereby recognizes the safety, well-being, and rights of children as a non-negotiable priority.

We are committed to preventing, detecting, and addressing any threat to the physical, mental, or moral integrity of children in all project activities, both in-person and online.

Scope

This policy applies to all staff, volunteers, partners, and third parties involved in project activities where children (under 18) participate, whether directly or virtually.

Definitions

Child: Any person under the age of 18.

Abuse: Any action or omission that harms a child's physical, emotional, or psychological well-being, including physical, sexual, emotional abuse, or neglect. In addition online activities can bring specific kinds of abuse such as online grooming, AI-generated abuse, and cyberbullying.

General Data Protection Regulation (GDPR): REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)

Principles

- The best interests of the child are the primary consideration in every action.
- All children have the right to safety, respect, and equal treatment without discrimination.
- Zero tolerance for abuse, neglect, or exploitation.
- Confidentiality and data protection are strictly observed.

Recruitment, Screening, and Training

- All staff and volunteers working with children must provide a criminal record certificate and references.
- Mandatory acceptance and signing of this child protection policy before engagement.
- Ongoing training on child protection principles, recognizing abuse, and reporting procedures.

Code of Conduct

All adults must:

- Treat children with respect and dignity.
- Avoid being alone with a child whenever possible; interactions should be transparent and, where possible, involve another adult.
- Never use physical or verbal punishment, threats, or degrading behavior.
- Use appropriate language and maintain professional boundaries.
- Obtain explicit written consent from parents/guardians before recording or using images/videos of children.

Participation and Empowerment

- Children's participation is voluntary and informed.
- Specify parental consent for under-15s in France for data processing.
- Age-appropriate information about the project, their rights, and reporting mechanisms is provided.
- Children are encouraged to express concerns and are informed how to seek help.

Digital Safety

- Use only safe, supervised digital platforms for online activities with minors.
- No direct personal communication between educators and children via private email or social media.
- Enhance children's digital literacy and provide guidance on safe internet use.
- Implement age verification tools for online access (e.g., EU Digital ID).

Reporting and Response

- Immediate reporting of any suspicion or incident to the designated Child Protection Officer (CPO).
- All reports are documented accurately, objectively, and confidentially.
- Referral to authorities (e.g., police, social services).
- The CPO oversees implementation, receives reports, and supports staff.

Collaboration and Communication

- Open communication with parents/guardians about the child protection policy and project activities.
- Cooperation with relevant authorities for effective incident management.
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Record-Keeping and Confidentiality

- Maintain secure, confidential records of all concerns, reports, and actions taken.
- Adhere to GDPR and relevant data protection regulations.
- Allow minors to request erasure of images/data under French law.

Monitoring and Review

- Regular review and update of the policy, especially after any incident or annually.
- Collect feedback from children, staff, and partners to improve safeguarding measures.

Declaration

All project participants, staff, and partners shall read, understand, and formally commit to upholding this Child Protection Policy as a condition of their involvement with Ludicius projects in general and Erasmus+ activities in particular. Adherence to this policy is mandatory, and any breach may result in exclusion from project activities and referral to relevant authorities

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Annex:

French Children's Image Rights Law (2024):

<https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000049163317#a0e36596-dce4-4911-94d9-6f759074ea0a>

Eurochild's Child Protection Policy: https://eurochild.org/uploads/2024/04/Child-Protection-Policy_Revised_2024.pdf

Council of Europe guidelines: <https://rm.coe.int/cdenf-2023-27-final-first-implementation-report-2022-2023-/1680ae0ef3>

DSA Article 28 (high privacy/safety standards for minors):

<https://5rightsfoundation.com/resource/statement-on-european-commissions-guidelines-on-dsa-article-281/>; <https://5rightsfoundation.com/resource/joint-statement-on-the-ini-report-on-on-the-protection-of-minors/>

SREN Law (2024): <https://www.twobirds.com/en/insights/2024/france/la-loi-sren-et-la-protection-des-mineurs>

GDPR: <https://gdpr-info.eu/>; <https://ico.org.uk/media/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/children-and-the-gdpr-1-0.pdf>

EU Anti-Trafficking Directive (2024): <https://eurochild.org/news/the-revised-eu-anti-trafficking-directive-strengthen-measures-to-protect-child-victims/>

French Penal Code Art. 434-3 : <https://www.loc.gov/item/global-legal-monitor/2016-04-01/france-new-legal-protections-for-children/>

EU BIK+ Strategy: <https://eurochild.org/news/next-steps-for-an-eu-digital-policy-that-protects-and-empowers-children-online/>; <https://www.esn-eu.org/news/european-commission-must-fund-its-ambition-integrated-child-protection>