

# CHILD SAFEGUARDING POLICY

## FINAL ENGLISH VERSION

|                              |                            |
|------------------------------|----------------------------|
| <b>Organisation</b>          | INTERACTIKA                |
| <b>Version</b>               | 1.0                        |
| <b>Date of adoption</b>      | 24 June 2026               |
| <b>Next scheduled review</b> | no later than 24 June 2028 |

*This document is an English translation of INTERACTIKA's Child Safeguarding Policy adopted on 24 June 2026. In case of any discrepancy between the Bulgarian and English versions, the Bulgarian version shall prevail.*

## 1. Our Commitment

At INTERACTIKA, we believe that every child and young person has the right to be protected from violence, abuse, exploitation, neglect, discrimination and any other form of harm.

Our organisation is committed to creating a safe, respectful, inclusive and supportive environment in which children and young people can learn, develop their skills, express their views and participate actively without fear of harm or abuse.

Child safeguarding is an integral part of the planning and implementation of all INTERACTIKA activities whenever they involve or may affect children and young people.

We apply the principles of the best interests of the child, equality, non-discrimination, respect for dignity and the child's right to be heard.

### Operational commitment

INTERACTIKA applies the “do no harm” principle at all stages of its activities – design, selection of participants and team members, communication, implementation, travel, accommodation, publicity, evaluation and follow-up activities. No project deadline, partnership commitment, public interest or reputational concern may take precedence over the immediate protection of a child.

## 2. Purpose of the Policy

This Policy aims to:

- prevent risks of harm to children and young people;
- define clear responsibilities when working with children;
- create a safe environment for participation and learning;
- establish standards of appropriate professional conduct;
- ensure that concerns and reports are taken seriously and addressed promptly;
- set out the main principles for action in the event of an incident or suspected risk;
- help staff, volunteers, trainers and partners understand their responsibilities;
- ensure that child safeguarding is integrated into the planning and management of the organisation's activities.

### Practical outcome of the Policy

For every activity involving children, it should be possible to demonstrate who is responsible, what risks have been assessed, what preventive measures have been selected, how participants can raise a concern, and how the organisation will respond to an incident.

## 3. Who the Policy Applies To

This Policy applies to all persons who work for or represent INTERACTIKA and participate in activities involving children and young people, including:

- members of the organisation;
- employees;
- trainers and facilitators;
- youth workers;
- volunteers;
- experts and external specialists;
- coordinators and activity leaders;
- accompanying persons;
- partner organisations, where applicable;
- other persons acting on behalf of INTERACTIKA.

The Policy applies to both in-person and online/digital activities.

### Scope in time, place and role

The Policy applies during work, volunteering, training, mobility activities, events, camps, visits, transport, accommodation and online interactions. It also applies outside formal working hours when a person is identifiable as a representative of INTERACTIKA or uses access, relationships or information obtained through the organisation. Partners and external contractors

are bound by the relevant requirements through a contract, written confirmation or equivalent document before beginning an activity involving children.

## 4. Children and Young People We Protect

The Policy applies to all children and young people who participate in or are affected by INTERACTIKA's activities, regardless of:

- sex or gender;
- age;
- disability or special educational needs;
- social or economic status;
- nationality or origin;
- language;
- family or other personal circumstances.

INTERACTIKA does not tolerate discrimination and considers the safety and dignity of every child equally important.

## 5. What We Mean by Child Safeguarding

Child Safeguarding means all measures through which the organisation prevents and responds to situations in which a child may be at risk of harm as a result of the actions of adults, other children, the organisation, its activities, partners or the online environment.

This includes prevention and response in relation to:

- physical abuse;
- emotional or psychological abuse;
- sexual abuse or sexual exploitation;
- neglect;
- bullying;
- discrimination;
- online bullying and other digital risks;
- inappropriate behaviour by adults towards children;
- inappropriate behaviour between children;
- other situations that may endanger a child's safety, dignity or well-being.

Risks may arise through direct contact, online interaction or the way activities are organised.

## 6. Core Principles

### The best interests of the child

When decisions affect children, their best interests are a primary consideration.

### Safety and prevention

We seek to identify and reduce risks before an incident occurs.

### Zero tolerance for violence

We do not accept any form of violence, abuse, exploitation, humiliation or neglect.

### Respect and dignity

Every child must be treated with respect, regardless of age, abilities or background.

### Equality and non-discrimination

All children have an equal right to protection.

### Participation and voice

Children and young people have the right to be heard and to express their views on matters that affect them.

## Confidentiality

Information relating to a safeguarding concern is shared only with persons who have a legitimate need to know, in accordance with applicable law.

## Responsibility

Child safeguarding is the responsibility of the whole organisation, not only of a designated person.

## Applying the principles

The guiding principle for INTERACTIKA is the safety and best interests of the child.

## 7. Responsibilities of INTERACTIKA

INTERACTIKA undertakes to:

1. maintain an up-to-date Child Safeguarding Policy;
2. appoint a responsible person – the Child Safeguarding Focal Point;
3. inform staff, volunteers and partners of their responsibilities;
4. apply appropriate measures when selecting persons who work with children;
5. provide appropriate training and guidance;
6. carry out an appropriate safeguarding risk assessment for activities involving children, proportionate to the nature and level of risk;
7. take preventive measures;
8. provide clear channels for raising concerns;
9. respond promptly and appropriately to concerns or incidents;
10. review and improve its safeguarding measures.

## Allocation of responsibility

The governing body has ultimate organisational responsibility for adopting, resourcing and overseeing implementation of the Policy. The Child Safeguarding Focal Point coordinates the safeguarding system but does not replace each person's individual duty to respond and report. The leader of a specific activity ensures an appropriate risk assessment, where applicable, emergency contact information, explanation of the rules to the team and participants, and documentation of the measures taken. Every team member must stop or modify an activity where there is an immediate risk to a child and inform the responsible persons.

## 8. Child Safeguarding Code of Conduct

This section constitutes INTERACTIKA's mandatory Code of Conduct and forms an integral part of this Policy.

Every person who works with or for children within INTERACTIKA is responsible for:

- complying with this Policy;
- following the Code of Conduct;
- maintaining professional boundaries;
- not engaging in conduct that may place a child at risk;
- reporting safeguarding concerns;
- not concealing or ignoring incidents;
- participating in required training;
- complying with personal data protection and digital safety requirements.

## Minimum standards of conduct

- do not use humiliating, sexualised, threatening or discriminatory language;
- do not initiate physical contact unless it is necessary, appropriate and suitable to the child's age and the context;
- do not give personal gifts, money, privileges or make secret arrangements that may create dependency or favouritism;
- do not use alcohol, drugs or engage in behaviour that reduces the ability to supervise while responsible for children;
- do not enter into intimate or sexual relationships with any person under 18, regardless of local concepts of consent;
- do not use personal accounts or disappearing messages for concealed one-to-one communication with a child where an organisational channel is available.

## 9. Safe Planning of Activities

Before activities involving children or young people, INTERACTIKA carries out an appropriate assessment of risks and identifies measures to prevent or reduce them.

This may include assessment of:

- the venue;
- transport;
- accommodation;
- adult-to-child ratios;
- the need for accompanying persons;
- health and emergency situations;
- the online environment;
- photography and video recording;
- communication with participants;
- specific individual needs;
- risks associated with partners and external providers.

For Erasmus+ activities, the protection, health and safety of participants are expressly recognised as core programme principles, and organisations must have effective procedures and mechanisms to ensure them.

### Minimum requirements for activities involving minors, proportionate to the nature and level of risk

- For activities involving minors, INTERACTIKA carries out and documents a safeguarding risk assessment proportionate to the nature and level of risk of the specific activity. The assessment may form part of the project or other applicable documentation or may be prepared as a separate document.
- a designated activity leader and at least one backup contact for safeguarding matters;
- emergency contact information and information about specific needs, accessible only on a need-to-know basis;
- clear rules for arrival, departure, attendance and handover of a child to a parent/guardian or accompanying person, where applicable;
- for travel, activities away from the usual venue or overnight stays – where possible, at least two responsible adults and allocated supervision roles; an exception is permitted only following a documented risk assessment;
- for overnight stays, adults and children do not share a bed; room sharing between an adult and a child is avoided and permitted only where objectively necessary, involving a legal representative/accompanying person, or in an emergency with documented protective measures.

There is no single universal adult-to-child ratio. It is determined according to age, location, nature of the activity, overnight stays, transport, specific needs and the qualifications of the team. Higher-risk situations require increased supervision.

## 10. Raising a Concern

INTERACTIKA encourages every child, young person, parent, staff member, volunteer, partner or other person to report if they have a concern about a child's safety, witness inappropriate behaviour, receive a disclosure from a child about abuse or other harm, or suspect that a child may be at risk.

No person is required to prove a concern before reporting it.

A concern may be reported to INTERACTIKA through the Child Safeguarding Focal Point or another team member, who must forward it immediately.

When a safeguarding concern is raised, INTERACTIKA follows an established internal process for receiving, assessing, documenting and taking appropriate action.

### Official channels and duty to report

Under Article 7 of the Bulgarian Child Protection Act, a person who becomes aware that a child needs protection must immediately notify the Social Assistance Directorate, the State Agency for Child Protection or the Ministry of Interior. This obligation also applies where the information was obtained in connection with a profession or activity, including where professional confidentiality applies.

- Immediate danger to life, health or safety: call 112 and notify the competent authorities without waiting for internal approval.

- Concern regarding a child at risk: notify the competent Social Assistance Directorate/Child Protection Department, the State Agency for Child Protection or the Ministry of Interior; internal notification must not delay statutory reporting.
- National Child Helpline 116 111: free of charge, available 24/7 to children and adults seeking support or wishing to report a child at risk.
- INTERACTIKA internal channel: interactika.eu@gmail.com. A concern may be raised orally or in writing; incomplete information is not a reason to disregard it.

## 11. If a Child Discloses a Problem

When a child or young person shares a situation that makes them feel unsafe:

- listen calmly;
- take what is said seriously;
- do not blame the child;
- do not make the child feel guilty;
- do not promise absolute confidentiality;
- do not conduct your own investigation;
- record the necessary information appropriately;
- inform the responsible person;
- take action in accordance with the established procedure.

The guiding principle is to protect the child without placing them at additional risk.

### What we do immediately

- ensure immediate safety and, where necessary, seek medical assistance/call 112;
- record as accurately as possible the child's words, the time, place and observed facts, without interpretation and without leading questions;
- explain that information will be shared only with people who need it in order to help;
- do not contact the alleged perpetrator for the purpose of "clarifying" the matter where this may increase risk or compromise the actions of the competent authorities;
- if the concern relates to the Child Safeguarding Focal Point, report it directly to a member of the governing body and, where applicable, to the competent authorities.

### Concerns or allegations regarding a staff member, volunteer or associated person

Where a concern relates to a staff member, volunteer, trainer, accompanying person, partner or another person associated with INTERACTIKA, the child's safety is the priority. The organisation may temporarily restrict the person's contact with children while the matter is being clarified. This is a precautionary measure and does not constitute a finding of guilt. Where necessary, the competent authorities are notified without undue delay.

### Management of safeguarding records

Reports, facts, decisions and actions taken are documented accurately and stored securely, with access limited to persons who have an official need to know. Data is retained only for the period necessary under applicable law and data protection rules and is then securely destroyed.

## 12. Photography, Video and Digital Safety

INTERACTIKA recognises that the digital environment creates both opportunities for learning and participation and potential risks.

When working with children and young people, the organisation applies appropriate rules regarding photographs and video recordings, publication of materials, parental/guardian consent where required, online communication, social media, use of digital platforms and personal data protection.

### Minimum rules for photography, video and online communication

- before publicly using an identifiable image of a child, ensure a valid legal basis and the necessary information/consent according to the specific context; consent is not automatically treated as the only possible legal basis;
- where consent is used, describe the purpose, channels, approximate period of use and the possibility of future withdrawal where applicable;

- do not publish a child's full name, exact real-time location and other information together where this unnecessarily increases risk;
- disable geolocation and unnecessary metadata where material is published publicly;
- humiliating, sexualised or contextually unsafe images are prohibited;
- prefer organisational accounts, group channels and transparent settings for communication; individual communication is documented and limited to what is necessary;
- for online sessions, define rules on recording, chat, screen sharing, access by external persons and response to cyberbullying.

## 13. Partners and External Organisations

Before involving a partner or external contractor in an activity with children, INTERACTIKA carries out reasonable checks proportionate to the role and risk and defines safeguarding responsibilities in writing. Persons from partner organisations who have direct contact with children should meet the applicable requirements for safer recruitment and conduct.

When INTERACTIKA works with partner organisations, trainers, providers or other external persons in activities involving children, safeguarding requirements are taken into account in the selection, planning and implementation of joint activities.

Where necessary, INTERACTIKA requires partners to comply with appropriate child safeguarding standards.

### Minimum partner checks

- their own policy/code or written acceptance of INTERACTIKA's minimum requirements;
- a designated safeguarding contact person;
- clear allocation of who receives concerns and who notifies the competent authorities;
- risk checks relating to accommodation, transport, subcontractors, photographers, trainers and other persons with access to children;
- INTERACTIKA's right to stop or modify a joint activity where the partner does not apply sufficient protective measures.

## 14. Child Safeguarding Focal Point

INTERACTIKA appoints a Child Safeguarding Focal Point who coordinates implementation of this Policy and supports the organisation with prevention and risk assessment, receiving and referring concerns, coordination of safeguarding cases, team training and information, review of policies and procedures, and monitoring implementation of safeguarding measures.

Contact: Milena Azova

Child Safeguarding Focal Point

INTERACTIKA

E-mail: [interactika.eu@gmail.com](mailto:interactika.eu@gmail.com)

### Authority and backup arrangements

The Child Safeguarding Focal Point may require a change of plan, additional supervision, restriction of access to children, temporary removal from activities involving children or another proportionate protective mechanism where a risk exists. These measures are precautionary and do not automatically constitute a finding of guilt. The governing body appoints a backup person or escalation mechanism in the event of absence, conflict of interest or a concern involving the Focal Point.

## 15. Monitoring and Review

INTERACTIKA is committed to regularly reviewing the effectiveness of its safeguarding policies and procedures.

Where necessary, the Policy is updated as a result of changes in legislation, changes in the organisation's activities, identified risks, practical experience, feedback received, incidents or concerns, or changes in international and European standards.

### Minimum review cycle

- annual review of training delivered, risk assessments, concerns and improvements made, without unnecessary disclosure of personal data;
- review of the Policy at least once every two years and additionally following a serious incident, a significant change in activities or the regulatory framework;
- monitoring whether related documents have actually been adopted, are accessible and are used in practice.

## 16. Safer Recruitment of People and Partners

INTERACTIKA applies proportionate safer recruitment measures for staff, volunteers, trainers, experts, accompanying persons and others with access to children. Depending on the role and applicable law, this may include verification of identity and experience, references, appropriate criminal-record/eligibility checks for work with children, safeguarding questions during selection, and mandatory familiarisation with this Policy and the Code of Conduct before beginning an activity.

When selecting partners and external contractors, INTERACTIKA checks whether they have appropriate child safeguarding measures or provide written acceptance of INTERACTIKA's minimum safeguarding requirements. Where an unacceptable risk is identified, the organisation may decide not to begin or may terminate the cooperation.

## 17. International Reference Framework

This Policy has been developed with regard to internationally recognised principles and good practice in child safeguarding, including the International Child Safeguarding Standards of Keeping Children Safe.

The Keeping Children Safe standards identify four key areas for building a child-safe organisation: Policy, People, Procedures and Accountability.

Important: Reference to these standards means that they are used as an international framework and source of good practice; it does not mean that INTERACTIKA is certified or accredited by Keeping Children Safe.

### Bulgarian and European legal and policy framework

- Bulgarian Child Protection Act – including Article 2 (definition of a child), Article 3 (principles) and Article 7 (duty to cooperate and notify without delay);
- Bulgarian Youth Act – § 1 of the Supplementary Provisions (young people: 15–29 years inclusive);
- United Nations Convention on the Rights of the Child – best interests, non-discrimination, right to participate and protection from violence;
- Regulation (EU) 2016/679 (GDPR) and the Bulgarian Personal Data Protection Act – processing of personal data, including images and sensitive information;
- Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse (Lanzarote Convention), where applicable;
- current Erasmus+ rules and requirements concerning the protection, health and safety of participants in programme activities.

### Official and reference sources

Bulgarian Child Protection Act – Ministry of Justice; Social Assistance Agency – information on reporting a child at risk; State Agency for Child Protection / National Child Helpline 116 111; Bulgarian Youth Act – National Assembly; Keeping Children Safe – International Child Safeguarding Standards; Erasmus+ Programme Guide.

In the event of a conflict between an internal rule and applicable law, the law prevails and the internal rule is updated without undue delay.

## 18. Approval

This Policy has been approved by the competent governing body of INTERACTIKA and applies from the date of its adoption.

### Safeguarding contact

Child Safeguarding Focal Point, INTERACTIKA | [interactika.eu@gmail.com](mailto:interactika.eu@gmail.com)

## Version Control

| Version | Date         | Change           |
|---------|--------------|------------------|
| 1.0     | 24 June 2026 | Initial adoption |

Minor amendments may be recorded as versions 1.1, 1.2, etc. A substantial or scheduled full review may be recorded as version 2.0. If a scheduled review results in no amendments, the review date should still be recorded and a new next-review date set.

|                       |                            |
|-----------------------|----------------------------|
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| Last review           | 24 June 2026               |
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|                                   |                                                                                    |
|-----------------------------------|------------------------------------------------------------------------------------|
| <b>INTERACTIKA representative</b> | Antoaneta Ivanovski                                                                |
| <b>Signature</b>                  |  |

### Entry into force and familiarisation

The Policy enters into force on the date of its adoption. All persons to whom it applies should be familiarised with it before beginning an activity involving children and whenever a material update is made.