



CHILD AND YOUTH SAFETY POLICY

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As an association of education for children and youth, Passerelles Numériques is deeply engaged in child and young people safety.

“Child”, in line with the United Nations Convention on the Rights of the Child and for the purposes of this policy, is defined as any person – girl, boy, young woman, young man, and children of other gender identities - under the age of 18 years (UNCRC Article 1).

“Youth”, in line with United Nations definitions, include individuals – young women, young men, and young persons of other gender identities - aged 15 years to 24 years old. This group spans the categories of ‘children’, ‘adolescents’ and ‘adults’ but regards young people as having particular safeguarding needs and requiring distinct consideration aside from younger children and older adults.

We consider violence against children or young people as all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, emotional ill-treatment or psychological violence maltreatment and sexual abuse. Acts of violence can also take place online through, for example, the web, social media or mobile phones. Furthermore, children and young people may be vulnerable and at risk due to, for example, reasons of gender, sexual orientation, ethnic origin, disability and age or illness.

Our students come from various provinces, mainly from rural areas and they have left their hometown and family to join PN centers. PN becomes responsible to care and protect them, especially those that are more vulnerable.

We welcome students from 17 to 25 years old and if some are over the formal age of majority and face different legal restrictions in what is permissible, they are still under our responsibility and require protection and we retain a duty of care towards them.

Due to our commitment for gender equality, this policy has a particular focus on girls and young women. Girls may be especially vulnerable and at risk from certain forms of discrimination or violence, including sexual and gender-based violence. As such, we are particularly concerned with ensuring that girls and young women do not experience harm, abuse, exploitation, or any other form of violence because of their engagement with us. Furthermore, we need to ensure that our safeguarding approach and response to safeguarding concerns are gender responsive.

The present child and young people safety policy aims at sharing with all our stakeholders (employees, volunteers, associates, providers and partners) our principles, requirements and standards and ensure they understand, are skilled and engage in their responsibilities and requirements to prevent and respond to any incidents to respect the safety of our students to meet their safeguarding.

1. PRINCIPLES OF PASSERELLES NUMERIQUES (PN)

This safety policy is underpinned by the following 8 principles that guides its implementation:

1. All children and young people aged under 18 years have equal rights to protection from all forms of violence as declared in Article 19 of the United Nations Convention on the Rights of the Child. In addition, the Universal Declaration of Human Rights recognizes fundamental human rights,

the dignity, worth and equal rights of people at any age, thus including young people aged 18 to 25 years old.

2. The human rights of children and young people will be respected and applied to all irrespective of age, sex, gender, gender identity, sexual orientation, nationality, ethnic origin, colour, race, language, religious or political beliefs, marital status, disability, physical or mental health, family, socio-economic or cultural background, class, any history of conflict with the law or any other aspect of their background or identity. Inequality, exclusion, and discrimination will be challenged and will not be tolerated.
3. All children and young people should be empowered and encouraged to fulfil their potential. Decisions made about children and young people will be made as far as possible with their participation and in their best interest giving full consideration to how such decisions will affect them. They will be encouraged to express their views in accordance with their age and level of maturity.
4. We have a responsibility to inform and empower children and young people so that they learn about and are better able to exercise their rights to protection. We will work with children and young people ensuring they understand the essence of this policy, our safeguarding commitment and the means via which they can report policy breaches.
5. Safeguarding concerns can be raised and discussed, poor practice and inappropriate behaviour challenged and addressed, and our safeguarding measures continuously reviewed and strengthened to ensure we remain accountable to children, young people, and their families.
6. Our safeguarding approach recognises and responds to the specific safeguarding risks and needs of the differing gender and other identities. It takes appropriate measures to address gender bias and other forms of discrimination and violence which may arise as a result of these. It supports the empowerment and fosters the inclusion of girls in the safeguarding process, in a manner that promotes equality, equity and ultimately their increased safety and protection.
7. Our safeguarding approach is mainstreamed in our internal procedures, our operations and projects ensuring that these are designed and delivered in a manner that does no harm to children and young people.
8. PN does not engage in direct one-on-one sponsorship of students where the sponsor has direct contact with the student. PN does engage in sponsorship of year classes but there is no direct interaction between sponsors and students.

2. FIELD OF APPLICATION

a) Prevention

PN takes appropriate measures to manage child and young people safeguarding risk factors and prevent abuse and exploitation before it occurs. Prevention measures include a code of conduct, internal rules and anti-harassment policy with associated awareness initiatives to ensure that our students and anyone involved with them are aware of safeguarding risks, policies and procedures. We have implemented a gender approach to aware students and prevent them from discrimination and violence based on gender.

b) Detection and response

In addition, PN has developed a response mechanism that enable the safe reporting of safeguarding concerns. The mechanisms ensure an appropriate handling of concerns within the organization, confidentiality and referral to the appropriate authorities if needed. Response measures have to be appropriately risk assessed and endeavour to ensure no further harm comes to the child or young

person as a result of any actions taken by PN. Concerns should be written up and information kept in accordance with the privacy and confidentiality policies of PN and local legislation. Are students briefed on this when they enter the PN program? Do they know that they can report any abuse? And to whom?

The sanctions and disciplinary measures may include the immediate suspension of personnel or collaboration with partners until such time as the allegations are followed up and either substantiated or refuted and/or where personnel or partner is convicted of abusing a child or young person. The said personnel or partner engagement is immediately terminated with cause from his or her position.

3. ENGAGEMENT

This Child and young people safety policy is systematically appended to all contracts concluded with PN. The persons and organizations concerned must sign it to mark their commitment to respect the principles and rules set out.

“I, the undersigned, declare that I have read this Child and young people safety policy, and undertake to comply with it in the context of my contractual relationship with PN. As such, I agree that I will:

As such, I agree that I will:

- a. Adhere to the Child and young people safety policy and be open and honest in my dealings with children and young people, their families, and communities participating in programmes, projects, processes, events, and activities.
- b. Treat children and young people in a manner which is respectful of their rights, integrity, and dignity and consider their best interests regardless of age, sex, gender, gender identity, sexual orientation, nationality, ethnic origin, colour, race, language, religious or political beliefs, marital status, disability, physical or mental health, family, socio-economic or cultural background, class, or any history of conflict with the law.
- c. Create and maintain an environment which prevents the abuse and exploitation of children and young people ensuring that I am aware of potential risks with regards to my conduct and work, and take appropriate action so as to minimise risks to children and young people.
- d. Contribute to building an environment where children and young people we engage with are:
 - respected and empowered to participate in and discuss decision making and interventions into their safeguarding in accordance with their age, maturity and evolving capacities;
 - well informed on their safeguarding and protection rights and what to do if they have a concern.
- e. Display high standards of professional behaviour at all times, providing a positive role model for children and young people.
- f. Comply with all relevant international standards and local legislation in relation to child labour, and refrain from using children and young people for domestic or other labour, if such work is inappropriate, exploitative or harmful given their age or developmental capacity, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury, exploitation, or violence. In addition, I understand that I must not use children and young people of any age that we work with for domestic or other labour.
- g. Respect the privacy and confidentiality of children and young people associated with PN. This

means I will:

- Never ask for or accept personal contact details or invitations to share personal contact details (this includes email, phone numbers, social media contacts, address, webcam, skype, etc.) from any child or family associated or formerly associated with our work or share my own personal contact details with such individuals except where this has been explicitly authorised by PN.
- Never disclose, or support the disclosure of, information that identifies sponsored families or children, through any medium, unless that disclosure is in accordance with standard PN policies and procedures and/or has the explicit consent of PN media including paper, photographs, and social media.
- Never make any contact with a child, young person, or family members associated with PN's work that is not supervised by a (or another) member of PN. Such contact may include but is not limited to visits and any form of communication via social media, emails, and letters.
- Always ensure that when on an official or work visit with PN and I wish to take pictures of children and young people associated with the organisation, for personal use, I will:
 - Always consult first with the local PN office so as to make sure that it is ok to take pictures in the local context and that the intended use of the pictures does not conflict with PN's policies
 - Ask permission of the child or young person informing them of the specific purpose(s) and intended use (including how and where) and respect their decision to say no making it clear that there will be absolutely no negative repercussions from denying such consent
 - Ensure the images are respectful and do not impact negatively on their dignity and privacy
 - Ensure that the use of the images does not put the child or young person at risk of being identified or located
 - Never upload the images of children and young people associated with PN to non-PN social media pages without the full and explicit consent of PN.

h. Report and respond to any concerns, suspicions, incidents or allegations of actual or potential abuse to a child or young person in accordance with applicable procedures of the engaging office.

i. Cooperate fully and confidentially in any PN investigation of concerns or allegations of abuse to children and young people.

j. Immediately disclose all charges, convictions, and other outcomes of an offence, which occurred before or occurs during association with PN that relate to exploitation and abuse of a child or young person.

And I will not :

a. Abuse or exploit a child or young person or behave in any way that places a child or young person at risk of harm, including through harmful traditional practices such as, for example, Female Genital Mutilation, forced or child marriage.

b. Engage in any form of sexual activity or develop physical/sexual relationships with anyone under the age of 18 regardless of the age of consent locally. Mistaken belief in the age of a child is not a defence.

- c. Engage in sexual relationships with PN youth direct beneficiaries aged 18 to 24 years as these undermine the credibility and integrity of PN's work and are based on inherently unequal power dynamics'.
- d. Use physical punishment/discipline or use of physical force of any kind towards children and young people.
- e. Engage young people in any form of sexual activity which involves the exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. This includes exchange of assistance that is due to beneficiaries.
- f. Use language or behave towards a child or young person in a way that is inappropriate, offensive, abusive, sexually provocative, demeaning or culturally inappropriate.
- g. Fondle, hold, kiss, hug or touch children or young people in an inappropriate or culturally insensitive way.
- h. Have a child/children/young person with whom I am in contact in a work related context, stay overnight at my home or any other personal residential location or accommodation.
- i. Sleep in the same room or bed as a child or young person with whom I am in contact in a work related context. Where it is necessary to sleep close to unaccompanied children and young people, I will make sure that another adult is present and it is in line with authorised procedures.
- j. Do things of a personal nature for children or young person, with whom I am in contact in a work related context, (e.g. taking a child/young person to the toilet/bathroom; helping them get un/dressed etc.) that they can do for themselves.
- k. Spend time alone away from others with children and young people with whom I am in contact in a work related context; I will always make sure that another adult is with me and/or I am with the child/young person in an open public place, where others are around and in plain view of others.
- l. Hit or otherwise physically assault or physically abuse children or young people.
- m. Act in ways that shame, humiliate, belittle or degrade children and young people, or otherwise perpetrate any form of emotional abuse.
- n. Discriminate against, show differential or preferential to, or favour particular children and young people to the detriment of them or others.
- o. Develop relationships with, engage in any practice with or develop behaviour towards children and young people which could in any way be deemed or interpreted as exploitive or abusive.
- p. Condone or participate in behaviour of children or young people which is illegal, unsafe, or abusive.
- q. Use any computers, mobile phones, video and digital cameras, or any such medium to exploit, harass or bully children or young people.
- r. Use computers, mobile phones, or video/digital cameras or other electronic devices, to access, view, create, download, or distribute pornography, especially abusive images of children or young people.

PASSERELLES NUMERIQUES

ALERT PROCEDURE

This procedure aims to establish a formal process for managing internal alerts within our international association.

Objectives: Defend PN's values, ensure that employees, volunteers and staff can raise concerns without fear of reprisal, establish a clear and confidential process for dealing with these issues.

I. Introduction

The internal procedure for collecting and handling reports provides for the possibility of collecting written reports (by e-mail to a generic address).

This report concerns events that have occurred or are "very likely" to occur within the company.

PN must inform the author of the alert in writing within 7 working days of receipt. It is also free to request further information from the reporter.

Where appropriate, the person issuing the alert must be informed of the reasons why his or her alert does not meet the conditions of validity laid down in Article 6 and A of I of Article 8 of the Law of December 9, 2016.

II. Persons concerned

The persons concerned are all employees, volunteers and service providers of the Association Passerelles Numériques in France and abroad. Access to an email address @passerellesnumeriques.org enables the alert to be launched.

It should be noted that Students (Beneficiaries) are dealt with by operational procedures, which are faster than this procedure, and covered by the operational responsibilities of General Managers.

The Association will communicate to all these people, as soon as they arrive (including in employment contracts, contracts with service providers and contractors), with an annual update.

III. Applicable cases

The cases concern :

- Fraud and fraudulent behaviour
- Bribery or blackmail
- Terrorist financing

- Harassment or behaviour that does not respect people
- Criminal offences
- non-compliance with local regulations
- Endangering the health or safety of persons
- Concealment of one of the situations described above

IV. Procedure

A. Alert identification

When a member of staff identifies a concern or irregularity, they should send an email to the specific address dedicated to internal alerts: alert@passerellesnumeriques.org

This email will be sent to two people outside the organization, who are members of the Audit Committee and appointed by the Chairman.

The procedure indicates the person(s) or department(s) designated to implement the internal procedure for collecting and processing alerts.

By virtue of their position or status, these people or departments are competent to carry out this task. To this end, they must have sufficient resources and receive specific training, which will be provided or financed by the company.

B. Alert processing

The third party receiving the e-mail is a member of the Audit Committee. This committee, and in particular its Chairman, validates the person in charge of conducting an independent investigation into the reported alert.

The investigation must be conducted impartially, confidentially and as quickly as possible.

All relevant information and evidence must be collected and documented appropriately.

C. Communication of the survey

Once the investigation is complete, the third party must prepare a detailed report on the results.

This report will then be submitted to the Board of Directors of the international association.

The report must include the findings of the investigation, recommended corrective measures and actions taken or to be taken to remedy the situation.

If the allegations are substantiated, the entity must remedy the matter.

It must also provide the person making the report with written information on the measures planned or taken to assess the accuracy of the allegations and to remedy the situation reported, where appropriate.

The third party must also inform the whistleblower of the reasons for these measures. On these points, the company has a period of three months from acknowledgement of receipt of the alert or, in the absence of acknowledgement of receipt, three months from the expiry of a period of

seven working days following the alert.

It is also stipulated that the author of the alert must be informed in writing that the alert has been closed. This occurs when the allegations are inaccurate or unfounded, or when the alert has become irrelevant.

D. Anonymous Alert

The procedure for collecting and processing reports must respect the integrity and confidentiality of the information gathered (identity of the person reporting, the persons concerned, etc.).

The information collected will only be passed on to third parties if this is necessary to process the alert.

The whistleblower must remain anonymous throughout the process.

All necessary precautions must be taken to protect the whistleblower's identity.

No disciplinary action or reprisals may be taken against the whistleblower.

Exceptions:

In the event of legal action, the whistleblower will be implicated by the court hearing the case.

In the event of deliberate misrepresentation of information with the aim of harming a person, the whistleblower may be held personally liable.



**Passerelles
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A Gateway for Life

Politique de sécurité des enfants et des jeunes

1. Introduction

En tant qu'association éducative pour les enfants et les jeunes, Passerelles Numériques (PN) s'engage à assurer leur sécurité et leur protection.

Définitions

- **Enfant** : Toute personne âgée de moins de 18 ans, conformément à la Convention des Nations unies relative aux droits de l'enfant (UNCRC, article 1).
- **Jeunes** : Les individus âgés de 15 à 24 ans, tels que définis par les Nations Unies, en reconnaissant leurs besoins distincts en matière de protection.

Champ d'application de la protection

PN considère que la violence à l'égard des enfants et des jeunes comprend toutes les formes d'abus physiques, mentaux, émotionnels et sexuels, ainsi que la négligence et l'exploitation. Cela inclut les atteintes en ligne via les médias sociaux, les téléphones portables ou d'autres plateformes numériques.

Les élèves de PN, souvent issus de milieux ruraux, sont sous la responsabilité et la protection de PN, en particulier ceux qui sont les plus vulnérables. Bien que certains élèves soient légalement adultes, PN a un devoir de diligence envers eux.

Cette politique met l'accent sur l'**égalité des sexes**, reconnaissant que les filles et les jeunes femmes peuvent être confrontées à des risques plus élevés de discrimination, de violence et d'exploitation. PN garantit une approche de sécurité sensible au genre.

2. Principes de la politique de sécurité de PN

Cette politique est guidée par **huit principes clés** :

1. **L'égalité des droits à la protection** : Tous les enfants et les jeunes ont un droit égal à la protection contre la violence (CDE, article 19).
2. **Respect des droits de l'homme** : La sécurité s'applique à tous, indépendamment de l'âge, du sexe, de l'appartenance ethnique, de la nationalité, du handicap ou de tout autre facteur identitaire.
3. **Autonomisation et participation** : Les jeunes doivent être associés aux décisions qui les concernent, en tenant compte de leur maturité et de leurs intérêts.
4. **Sensibilisation et éducation** : PN informe et éduque les jeunes sur leurs droits et les mesures de protection.
5. **Responsabilité et signalement** : Les problèmes de sécurité peuvent être soulevés librement et les comportements inappropriés sont traités de manière proactive.

6. **Approche sensible au genre** : PN reconnaît les risques liés au genre et y répond, et promeut l'égalité dans les pratiques de sécurité.
 7. **Intégration dans les opérations** : La protection est intégrée dans les procédures, les projets et les activités quotidiennes de PN afin de prévenir les dommages.
 8. **Pas de parrainage direct** : PN n'autorise pas le parrainage individuel où le parrain interagit directement avec l'étudiant.
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3. Champ d'application

Mesures de prévention

PN prend des mesures proactives pour prévenir les abus et l'exploitation, notamment

- Un **code de conduite** pour les membres du personnel
- **Un règlement intérieur** et une **politique de lutte contre le harcèlement**.
- Des activités de sensibilisation sur la sécurité, la gestion des risques, l'égalité des sexes et la discrimination.

Détection et réaction

PN a mis au point un **mécanisme de réponse** pour traiter les problèmes de sécurité

- **Des canaux de signalement sûrs** pour les plaintes.
 - Confidentialité et renvoi aux autorités si nécessaire.
 - Évaluation appropriée des risques pour s'assurer que les actions ne causent pas d'autres dommages.
 - Les mesures disciplinaires, y compris la suspension ou le licenciement des personnes reconnues coupables d'abus.
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4. Engagement et mise en œuvre

Cette politique est jointe à tous les contrats PN. Tous les employés, bénévoles, volontaires et partenaires doivent la signer, affirmant ainsi leur engagement à :

- Respecter et faire respecter les principes de protection.
- Traiter les enfants et les jeunes avec dignité et intégrité.
- Créer un environnement sûr, exempt d'abus et d'exploitation.
- Signaler toute préoccupation concernant des violations de la sécurité.
- Garantir un comportement professionnel et éthique à tout moment.

Comportements interdits

PN interdit formellement :

- Toute forme d'**abus, d'exploitation ou de préjudice** à l'égard des enfants et des jeunes.
 - **Toute activité sexuelle** avec des personnes de moins de 18 ans, indépendamment des lois locales sur le consentement.
 - **Des relations sexuelles avec des étudiants de PN âgés de 18 à 24 ans**, en raison d'un déséquilibre des pouvoirs.
 - **Toute punition physique ou usage de la force** à l'encontre des jeunes.
 - **Le favoritisme, la discrimination ou tout comportement dégradant.**
 - **Un partage non autorisé d'informations ou de photos d'élèves.**
 - **Des interactions privées et non supervisées** entre le personnel et les élèves.
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5. Procédure de signalement et d'alerte

PN a mis en place une **procédure d'alerte interne** pour signaler les problèmes de sécurité. Les objectifs sont les suivants:

- Protéger les valeurs de PN et garantir un environnement sûr.
- Offrir aux employés et aux bénévoles une procédure de signalement **confidentielle et sans crainte**.
- Répondre de manière efficace et appropriée à tous les rapports d'alerte.

Canaux d'information

- Les rapports peuvent être envoyés par courrier électronique à alert@passerellesnumeriques.org.
- L'alerte est examinée par **deux membres indépendants du comité d'audit de PN**.
- PN accuse réception dans les **sept jours ouvrables**.

Processus d'enquête

1. **Évaluation et confidentialité** : Les rapports sont traités de manière impartiale, dans le respect de la vie privée.
2. **Enquête et documentation** : Les résultats sont compilés dans un rapport destiné au conseil d'administration de PN.
3. **Mesures correctives** : Si les allégations sont fondées, PN prend des mesures immédiates.
4. **Communication** : PN informe le dénonciateur de la résolution dans un délai de **trois mois**.
5. **Rapports anonymes** : PN veille à ce que les dénonciateurs puissent faire des signalements confidentiels sans crainte de représailles.

Conséquences des violations

- Suspension immédiate du personnel impliqué pendant l'enquête.
 - Cessation de l'emploi ou des partenariats en cas de mauvaise conduite confirmée.
 - Saisie des autorités judiciaires si nécessaire.
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Annexe 1 : Résumé de la procédure d'alerte

1. Qui peut lancer une alerte ?

- o Employés, bénévoles, volontaires, prestataires de services et parties prenantes.

2. Que peut-on signaler ?

- o Fraude, harcèlement, abus, problèmes de sécurité, activités criminelles, non-respect des règlements.

3. Comment faire un rapport ?

- o Envoyez un courriel à alert@passerellesnumeriques.org

4. Enquête et suivi

- o Le comité d'audit de PN traite le rapport et en assure la confidentialité.

5. Décision finale

- o Le conseil d'administration décide des mesures correctives à prendre et en informe le dénonciateur.