



SAFEGUARDING & CHILD PROTECTION POLICY

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Our Vision & Mission

Protect Us Kids Foundation (PUK) is dedicated to protecting children and youth worldwide from cyber-related crimes so that they may safely navigate online. Our overall goal is to protect children, especially those in rural and under-resourced communities, who may be more susceptible to predatory maneuvers within the digital environment.

Our Commitment

PUK believes that children have a right to safely and securely navigate the cyberspace without falling victim to child predators and exploiters. We are committed towards advancing online safety awareness; stimulating the development of technology-driven safety solutions; and establishing strategic partnerships with other organizations to identify key indicators that lead to exploitation. Thus, we strive to provide and implement programs that are centered on the unique cultural, behavioral, and societal aspects of marginalized and rural communities that have afforded criminals an increased opportunity to exploit children leveraging technology.

Purpose

This Safeguarding and Child Protection Policy ("Policy") is meant to describe the responsibility of those working for and with PUK to ensure that our actions and programs align with international child protection principles while ensuring that our efforts do not further victimize the children we seek to protect

Audience

The Policy addresses the protection of children and young people and defines a "child" as anyone under the age of 18 years as defined in Article 1 of the UN Convention on the Rights of the Child (CRC).

The Policy applies to all PUK employees, interns, volunteers (including members of the Board of Directors), independent contractors, consultants, advisors, program coordinators, mentors, and other individuals working for or on behalf of PUK, both within the United States and internationally. It also applies to organizations and individuals participating in partnerships, programs, or activities conducted with PUK.



For purposes of this Policy, a Youth Volunteer is any PUK volunteer, intern, program participant, ambassador, representative, or other individual under the age of 18 who performs volunteer or program-related activities on behalf of or in association with PUK.

An Adult Youth Supervisor is any individual age 18 or older who is assigned responsibility for supervising, coordinating, mentoring, advising, managing, training, communicating regularly with, or otherwise exercising authority over a Youth Volunteer. This includes employees, adult volunteers, interns, advisors, program coordinators, contractors, and authorized personnel of PUK partner organizations.

Adult Youth Supervisors are subject to heightened safeguarding responsibilities because of their position of trust, authority, access, and influence over Youth Volunteers.

Basis

PUK bases its work on the principles enshrined in the CRC, in particular:

- Non-discrimination (Article 2);
- Best interests of the child (Article 3);
- Voice and agency (Article 12);
- Privacy (Article 16);
- Abuse and neglect (Article 19); and
- Sexual exploitation (Article 34)

The Policy is also guided by the Optional Protocol on the Sale of Children, Child Prostitution and Child Pornography, and the WeProtect Global Strategic Response, the Prevention Framework and the Model National Response Strategy.

Our Responsibilities

It is the responsibility of PUK to ensure that its staff, practices, and programs do not jeopardize the safety of children in any way. To that end, PUK will take the following measures:

I. Recruitment and Employment

Advertisement for Vacancies

Advertisements and announcements for job vacancies should include references to the Policy and any screening process.



Interviews

All job interviews will specifically contain questions relating to the candidate's previous history and suitability to work for a child protection organization.

All offers of employment shall be subject to a minimum of two satisfactory references from previous employers and the results of background checks for criminal charges of violent crimes or crimes against children.

Background Checks

All potential employees must undergo a standardized recruitment process, including application, interview, reference check, and criminal background check. At PUK's discretion, the same may be requested of interns, volunteers, and independent contractors.

Potential employees, interns, volunteers, and independent contractors must provide written consent for PUK to conduct this screening and must provide truthful and complete information for screening purposes.

Any potential or current employee, intern, volunteer, or independent contractor who provides incorrect or incomplete information for the background screening will not be offered employment and, if a current employee, intern, volunteer or independent contractor, will be subject to disciplinary measures up to and including termination.

Enhanced Screening for Individuals Supervising Youth Volunteers

Any adult employee, volunteer, intern, contractor, advisor, coordinator, mentor, or other individual who will have direct, recurring, supervisory, or otherwise significant contact with Youth Volunteers must successfully complete PUK's required safeguarding screening process before assuming those responsibilities.

Screening requirements may include, as appropriate to the role and jurisdiction:

- Application and identity verification;
- Interview regarding suitability to work with children and youth;
- Reference verification;
- Criminal background screening;
- Review of prior employment or volunteer service involving children;
- Execution of required confidentiality, safeguarding, and conduct acknowledgements; and
- Any additional screening reasonably required based on the nature of the role.

Where an individual has been referred through an approved university, workforce program, governmental entity, or community partner that has already completed documented background screening, PUK may determine that such screening satisfies all or part of PUK's requirements, provided that the screening is appropriate to the individual's level of access and responsibility.



No individual shall be assigned direct supervisory responsibility for Youth Volunteers until required safeguarding screening and onboarding have been completed.

PUK reserves the right to conduct additional screening where warranted by the individual's role, access to children, access to sensitive information, safeguarding risk, or applicable legal requirements.

Orientation and Training

All employees, interns, volunteers, independent contractors, advisors, and other personnel covered by this Policy shall receive safeguarding information appropriate to their role.

Individuals assigned responsibility for supervising, managing, mentoring, advising, training, or otherwise exercising authority over Youth Volunteers must complete required role-specific safeguarding training before assuming those responsibilities.

Training for Adult Youth Supervisors shall include, at minimum:

- Appropriate adult-child professional boundaries;
- Recognizing grooming, coercion, manipulation, exploitation, harassment, and abuse;
- Youth-to-youth safeguarding concerns;
- Appropriate physical and digital communication with minors;
- Prohibition on unauthorized one-on-one contact;
- Online meeting and social media safeguards;
- Protection of youth personal and identifying information;
- Responding appropriately when a Youth Volunteer discloses a concern;
- Reporting and escalation procedures;
- Prohibition against independently investigating safeguarding allegations;
- Appropriate use of photographs, recordings, and youth-generated content;
- PUK's requirements regarding artificial intelligence and youth information; and
- Responsibilities applicable when programs are conducted with community partners.

Completion of required safeguarding training shall be documented by PUK. Refresher training shall be provided periodically and when material changes are made to this Policy or PUK's safeguarding procedures.



II. Supervision and Support

PUK Management shall maintain open lines of communication and foster an environment in which employees, interns, volunteers, Youth Volunteers, contractors, advisors, and other individuals participating in PUK activities feel safe raising questions or reporting child protection and safeguarding concerns.

Youth Volunteers shall be informed in an age-appropriate manner that they may raise a concern without fear of retaliation and are not required to report a concern through an individual whose conduct is the subject of that concern.

a. Adult Supervision of Youth Volunteers

PUK recognizes that individuals who supervise Youth Volunteers occupy a position of trust and authority. Adult Youth Supervisors are responsible not only for supporting the Youth Volunteer's work, but also for maintaining an environment in which youth can participate safely, raise concerns without fear of retaliation, and maintain appropriate boundaries with adults.

Adult Youth Supervisors shall:

- Maintain professional and age-appropriate relationships with Youth Volunteers;
- Interact with youth only within the scope of authorized PUK programs and assignments;
- Ensure interactions are observable, interruptible, and conducted through approved settings and communication channels;
- Avoid situations in which an adult is isolated or alone with a Youth Volunteer;
- Respect the dignity, privacy, cultural background, and personal boundaries of every Youth Volunteer;
- Provide equitable treatment and avoid favoritism or relationships that could create inappropriate dependency;
- Immediately report safeguarding concerns through PUK's established reporting process;
- Escalate concerns when another adult's conduct toward a Youth Volunteer appears inappropriate, even when no allegation of abuse has been made; and
- Cooperate with safeguarding reviews while maintaining required confidentiality.



Adult Youth Supervisors shall not:

- Engage in romantic, sexual, sexually suggestive, exploitative, or otherwise inappropriate conduct or communication with a Youth Volunteer;
- Request or encourage secrecy from a Youth Volunteer regarding communications, meetings, gifts, activities, or relationships;
- Communicate with Youth Volunteers through personal social media accounts, disappearing-message applications, or other unauthorized communication channels;
- Establish private or undisclosed relationships with Youth Volunteers outside the authorized PUK program;
- Provide personal gifts, money, favors, transportation, lodging, or other benefits to an individual Youth Volunteer without prior authorization;
- Invite Youth Volunteers to an adult's private residence or meet with them in another private location without documented authorization and appropriate safeguards;
- Use corporal punishment, humiliating discipline, threats, intimidation, bullying, retaliation, or degrading treatment;
- Photograph, record, or distribute images or recordings of Youth Volunteers without required authorization and consent;
- Request unnecessary personal, family, financial, medical, location, or other sensitive information from Youth Volunteers;
- Ask a Youth Volunteer to investigate, access, retrieve, view, download, preserve, or forward potentially harmful, exploitative, or illegal content;
- Use their position of authority to pressure a Youth Volunteer into performing activities outside the approved scope of the youth's role; or
- Independently investigate a safeguarding complaint or allegation.

Where practical, activities involving Youth Volunteers should use a two-adult or equivalent observable-and-interruptible supervision model. At minimum, no adult shall knowingly place themselves in a situation involving private, unobservable one-on-one interaction with a Youth Volunteer.



The same safeguarding standards apply whether interaction occurs in person, virtually, by telephone, through messaging platforms, during travel, at an event, or through a PUK or partner organization's technology platform.

III. Roles and Responsibilities For the Implementation of the Child Safeguarding Policy

The Chief Executive Officer (CEO) and Board of Directors are accountable for raising the visibility of, and compliance with, the Policy, including reporting and responding to alleged policy violations.

PUK Management shall ensure that safeguarding responsibilities are incorporated into program design, volunteer management, internship supervision, youth engagement, community partnerships, and technology-enabled activities.

Program Managers, PUK Advisors, Youth Coordinators, and Adult Youth Supervisors are responsible for implementing this Policy within the activities they oversee. Their responsibilities include:

- Maintaining appropriate supervision of Youth Volunteers;
- Ensuring required safeguarding training and onboarding requirements have been completed;
- Enforcing professional boundaries;
- Ensuring only authorized adults have supervisory access to Youth Volunteers;
- Identifying and escalating safeguarding risks;
- Ensuring Youth Volunteers understand how and where to report concerns;
- Protecting Youth Volunteers from retaliation for good-faith reports;
- Ensuring safeguarding requirements are followed in both virtual and in-person environments; and
- Promptly reporting suspected violations in accordance with this Policy.

PUK shall designate an appropriate Safeguarding Point of Contact responsible for receiving and coordinating the escalation of safeguarding concerns. PUK shall also maintain an alternative reporting path when a concern involves the Youth Volunteer's immediate supervisor, PUK Advisor, Program Manager, or other individual who would ordinarily receive the report.

No individual who is the subject of a safeguarding allegation may control, prevent, suppress, screen, or independently investigate a report concerning their own conduct.

Safeguarding concerns shall be handled only by individuals authorized by PUK to perform that function. Nothing in this section authorizes PUK personnel or volunteers to independently investigate suspected criminal conduct or child abuse.

IV. Use of Images in Presentations

Any images (whether still or moving) used in presentations shall not contain child sexual abuse material (CSAM), obscenity, adult pornography, or any other content deemed offensive or inappropriate.



V. Information and Communication Technologies

PUK adopts more technologically advanced ways of working and utilizing information technologies and platforms to engage children, caretakers, and communities. For this reason, PUK will develop and continuously improve technically sound cybersecurity policies and practices to ensure adequate protection from online and technology-facilitated abuse and exploitation.

a. Artificial Intelligence and Emerging Technology Threats

PUK recognizes that artificial intelligence presents both opportunities and risks in the child protection landscape. AI-facilitated exploitation is an active and evolving threat vector that PUK personnel must be equipped to identify and respond to.

AI-Generated Exploitation Content:

- AI tools can be used to generate synthetic child sexual abuse material (AI-CSAM), deepfake exploitation imagery, and realistic but fabricated content depicting minors in harmful contexts
- PUK personnel shall treat AI-generated CSAM with the same severity and reporting obligations as traditional CSAM
- Any suspected AI-generated exploitation content encountered by PUK personnel shall be reported immediately to the NCMEC CyberTipline (within the United States) or to local authorities (overseas), consistent with Section VII of this Policy
- Personnel shall not open, download, save, or forward suspected AI-generated exploitation content

AI-Enabled Grooming and Manipulation:

- AI-powered chatbots, voice synthesis tools, and language models can be used by offenders to automate and scale grooming behaviors targeting children
- PUK's cybersecurity awareness programs and training materials shall include education on AI-enabled grooming tactics and how they differ from traditional grooming patterns
- Personnel shall be trained to recognize indicators that a child may be interacting with AI-driven grooming tools

Staff Training:

All PUK employees, interns, volunteers, and independent contractors shall receive training that includes awareness of AI-facilitated exploitation, including:

- Recognition of AI-generated CSAM and how it differs from traditional CSAM



- Understanding of deepfake technology as it relates to child exploitation
- Awareness of AI-enabled grooming tools and tactics
- Proper reporting procedures for AI-generated exploitation content
- Responsible use of AI tools in PUK's own operations to avoid creating additional risks for children

PUK Digital Platforms:

- PUK's cloud-based platforms, including the We-Rise Portal and RiseSpace application, shall incorporate safeguards appropriate to the evolving AI threat landscape
- Safeguards shall include measures to detect and prevent the upload or distribution of AI-generated harmful content
- These safeguards shall be reviewed as part of PUK's annual safeguarding risk assessment

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Responsible AI Use by PUK:

- PUK shall ensure that any AI tools used in its own programs and operations do not create additional risks for the children it serves
- AI tools that interact with children or process children's data shall be subject to a documented risk assessment before deployment
- Risk assessments shall be consistent with PUK's Privacy Policy and Cybersecurity & Information Security Policy
- AI-powered communication tools (including chatbots and automated messaging systems) shall not be used for direct, unsupervised communication with children participating in PUK programs
- Any AI-assisted communication with children shall include human oversight and shall comply with the communication safeguards described in Section XI of this Policy

VI. Confidentiality and Safe Space Announcements

Presentations and training involving child protection professionals should take care not to trigger survivors of childhood abuse. Child protection content should include trigger warnings at the start when content is beyond the routine professional experience of the participants. If participant experience varies or is not known, assume a higher level of warning is required. Presentations of challenging content to non-professionals or parents/guardians require the most robust safe space warnings. Warnings may include the following:



- This presentation will include the following: note if the content includes descriptions, obscured images, cases or sensitive topics.
- We acknowledge there are likely to be survivors or supporters of survivors of abuse among us.
- Talking about abuse can cause strong emotions. Feel free to detach or step away if needed. We will not ask you why you stepped away.
- Please share anonymized cases only. If you share a case, participants must agree to seek explicit permission before repeating the details of shared cases.

Case reviews should be anonymized. Explicit permission should be obtained before case details are used in training, and identifying information should be changed. Email correspondence containing case information should be deleted as soon as support has concluded.

In cases of participants without professional engagement in child protection (such as parents/guardians) and/or potentially triggering content, it may be necessary to provide a written safe space notice or station, someone at the door for late arrivals.

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VII. Reporting

Employees, interns, volunteers, and independent contractors in the United States will report to the call center or CyberTipline of the National Center for Missing & Exploited Children (NCMEC) any reports received by any means regarding sexual abuse or exploitation of children.

In addition, in the course of conducting research, if a website or other materials seem to contain child sexual abuse content, employees, interns, volunteers, and independent contractors will immediately report that site to the CyberTipline and will not open the link, image, or material. If needed, an employee, intern, volunteer, or independent contractor may also speak with Management for additional support.

Overseas employees, interns, volunteers, and independent contractors should contact local authorities to file a formal complaint as required by law.

a. Safeguarding Concerns Involving PUK Personnel or Youth Supervisors

Any employee, intern, volunteer, Youth Volunteer, parent or guardian, partner representative, or other individual may report conduct that creates a safeguarding concern, including conduct involving an Adult Youth Supervisor.

Concerns may include, but are not limited to:

- Inappropriate communications;
- Boundary violations;



- Grooming behaviors;
- Bullying, intimidation, coercion, or harassment;
- Requests for secrecy;
- Unauthorized private meetings or communications;
- Retaliation;
- Inappropriate use of photographs or recordings;
- Improper access to youth information;
- Sexual misconduct or exploitation;
- Physical or emotional abuse;
- Youth-to-youth harmful behavior; or
- Any conduct that causes a Youth Volunteer to feel unsafe or pressured.

A Youth Volunteer shall not be required to report a concern through the individual who supervises them when that individual is involved in the concern.

PUK shall maintain an alternative reporting route directly to designated PUK Management or the designated safeguarding point of contact.

Individuals receiving a safeguarding report shall:

1. Take the report seriously;
2. Prioritize the immediate safety and well-being of the child;
3. Listen without conducting an investigative interview;
4. Preserve confidentiality to the extent appropriate and legally permissible;
5. Document the concern through PUK's authorized reporting process;
6. Immediately escalate the matter to the designated safeguarding authority within PUK; and
7. Make or facilitate reports to law enforcement, child protection authorities, NCMEC, or other appropriate authorities when required by law or PUK procedure.

Personnel must not independently investigate allegations, confront the alleged subject of the report, or seek additional evidence unless specifically authorized as part of an established safeguarding response process.



PUK may implement interim protective measures, including temporary reassignment, restriction of system or youth access, or removal from supervisory duties, while a safeguarding concern is being assessed. Such interim measures are protective and do not constitute a determination that misconduct occurred.

VIII. Process of Engagement

Partnership agreements and contracts should, whenever possible, contain a statement that affirms the parties' commitment to the principles articulated in the Policy and put in place protection measures in line with these principles.

In addition, PUK encourages organizations with whom we collaborate to develop child protection policies and/or to abide by the requirements outlined here to protect against the re-victimization of children. Where both institutions have policies, the more restrictive Policy should be followed.

Where a PUK community partner, educational institution, vendor, contractor, or other third party will provide personnel who supervise or interact regularly with Youth Volunteers, the partnership arrangement should identify applicable safeguarding responsibilities.

Where appropriate, agreements should address:

- Screening of adults assigned to work with minors;
- Required safeguarding training;
- Identification of authorized youth supervisors;
- Reporting and escalation procedures;
- Information sharing following a safeguarding incident;
- Communication and technology requirements;
- Immediate protective measures when concerns arise; and
- Responsibility for complying with applicable child protection laws.

When PUK and a partner organization maintain separate safeguarding policies, the more protective requirement should be followed where the requirements can lawfully and operationally coexist. Any uncertainty should be escalated to PUK Management before youth activities proceed.

IX. Embedding Safeguarding in PUK's Work

PUK will undertake safeguarding risk assessments, annually at a minimum, to identify areas of safeguarding and child sexual harassment and exploitation and document steps that are being taken to remove or reduce these risks.



- Annual safeguarding risk assessments shall specifically include an evaluation of AI-facilitated exploitation risks, including the use of AI to generate exploitation content, automate grooming at scale, and create synthetic media depicting program participants
- The assessment shall also evaluate whether any AI tools or platforms used by PUK or its partners introduce safeguarding risks that require mitigation
- Assessment findings related to AI threats shall be documented and reported to the CEO and Board of Directors

PUK will incorporate safeguarding measures into programs and throughout the project cycle through collaborative program design approach, including with PUK partners and program participants, at all stages to produce better design, monitoring, and evaluation of safeguarding.

PUK will ensure that multiple mechanisms for reporting child sexual harassment and exploitation are accessible to children and adults worldwide, especially individuals who are most at risk of sexual harassment and exploitation. Documented reporting procedures in relevant local languages will be created where necessary. PUK will ensure that anyone responsible for receiving reports understands how to carry out their duties and handle them in a safe and confidential manner. PUK will be transparent with survivors about any obligations or actions that may need to be taken due to their report, including referral to third parties. All actions will be informed by an assessment of risk to all those involved. Partners and communities in PUK activities will be informed of the expected behaviors of PUK employees and related personnel and on how to make a report.

X. Working with Children and Youth Volunteers in Professional Settings

These requirements apply to all PUK employees, adult interns, adult volunteers, contractors, advisors, coordinators, mentors, community partner personnel, and other adults who interact with children or Youth Volunteers as part of PUK activities.

The requirements apply to both incidental and recurring contact, including situations in which an adult manages, mentors, supervises, trains, evaluates, advises, or coordinates the activities of a Youth Volunteer.

All covered individuals shall abide by the PUK Safeguarding & Child Protection Policy or, when activities are conducted with a partner institution, the more protective applicable safeguarding requirement.

Taking photographs or recordings of children or Youth Volunteers is by consent only. Images should be reviewed and approved in accordance with PUK requirements and, where applicable, by an authorized institution or partner representative to ensure that no child is photographed or recorded without the required consent of their parent or legal guardian.

No adult shall be alone with a child or Youth Volunteer in an unobservable or non-interruptible environment. Interactions should occur in group settings or environments that are observable and interruptible.



Where one-to-one discussion is reasonably necessary for mentoring, feedback, performance discussions, or support:

- The interaction shall occur through an approved PUK or partner environment;
- Another authorized adult should know the meeting is occurring;
- Physical meetings shall occur in an observable or accessible location;
- Virtual meetings shall use approved organizational platforms;
- Communications shall remain professional and relevant to the program; and
- Any safeguarding concern arising from the interaction shall be reported promptly in accordance with this Policy.

All adults working with children or Youth Volunteers shall maintain appropriate physical and emotional boundaries and shall refrain from touching or other behavior not specifically required for an authorized program activity without the child's consent, particularly where the behavior could reasonably appear inappropriate.

Adults shall not engage in conduct that a reasonable person could interpret as exploitative, sexualized, coercive, intimidating, secretive, manipulative, or otherwise inappropriate.

XI. Adult Communication With or About a Child

All communication between Adult Youth Supervisors and Youth Volunteers shall occur for legitimate PUK program purposes and through approved, appropriately monitored communication channels whenever possible.

Adult Youth Supervisors shall not use:

- Personal social media direct messages;
- Disappearing-message applications;
- Private social media accounts;
- Secret or undisclosed chat groups; or
- Other unapproved communication methods

to communicate individually with Youth Volunteers.

Where electronic communication with an individual Youth Volunteer is necessary, appropriate safeguards shall be used. Depending on the circumstances, these may include an organizational account, monitored platform, group channel, inclusion of another authorized adult, or parent/guardian visibility.

Adults must not:

- Delete communications with Youth Volunteers for the purpose of avoiding organizational oversight;
- Request that a Youth Volunteer conceal communications from PUK, parents/guardians, or other appropriate adults;



- Communicate with Youth Volunteers in a sexual, romantic, threatening, manipulative, or otherwise inappropriate manner;
- Seek unnecessary personal or intimate information; or
- Establish communication patterns unrelated to the authorized PUK activity.

The same communication safeguards apply to Youth Volunteers who participate in ongoing PUK projects, committees, advisory groups, internships, volunteer teams, and leadership activities—not only children participating in one-time programs or events.

XII. Online Events with Children

PUK hosts online events with partners targeted to children and encouraging child engagement. To ensure the online events are safe and age appropriate, the following measures should be taken by PUK staff, interns, volunteers and independent contractors:

- Promote respect to diversity as some children may communicate and receive information differently.
- If the online event is being recorded and published on public platforms, or if a link to the recording is to be shared, ensure the child and their parent/legal guardian are aware that this content will be permanent and there will be no way of containing the movement of the recordings.
- Host a pre-meeting between the children and the moderator and have a run-through of the session and allow the child to practice their speech making sure they are comfortable.
- Communicate to other speakers that there will be children speaking and communication should be in a child friendly manner.
- Set ground rules at the beginning of the meeting and share the commitment to zero tolerance of sexual exploitation, abuse and harassment of any child.
- Emphasise that safeguarding policies governing in person meetings do not dissolve when meetings occur online.
- Communicate in a child-friendly manner PUK's reporting and response mechanisms to report misconduct and abuse.
- Importantly, children's participation should not be a one-off activity. Organisers need to ensure that children can express their opinions and provide feedback before, during and after the activity. They need also to ensure that children are informed of the results of their participation, and that feedback from participants is monitored.



a. Ongoing Virtual Engagement With Youth Volunteers

Safeguarding requirements applicable to online events also apply to recurring virtual work involving Youth Volunteers, including:

- Team meetings;
- Project meetings;
- Mentoring;
- Training;
- Slack or other collaboration platforms;
- Video conferences;
- Youth advisory meetings;
- Program planning; and
- Other digital interactions.

Adult Youth Supervisors shall use PUK-approved platforms and shall ensure that online interactions remain observable and professionally appropriate.

Private breakout rooms or individual virtual meetings between one adult and one Youth Volunteer should be avoided unless appropriate safeguards and organizational visibility are in place.

Youth Volunteers shall be informed, in age-appropriate language:

- Which adults are authorized to supervise them;
- What types of communication are appropriate;
- Which communication channels adults may use;
- That adults should not ask them to keep communications or interactions secret;
- How to report behavior that makes them uncomfortable;
- How to report a concern about their direct supervisor; and
- That they will not be penalized or retaliated against for making a good-faith safeguarding report.

XIII. Monitoring and Review

A written central record should be kept of any reports received by PUK Management or Supervisors concerning child abuse or sexual misconduct or a missing/abducted child related to staff actions. The written record should be reviewed regularly by senior staff to ensure that the child protection concern was handled according to the Policy.

All public presentations to be made by PUK employees, interns, volunteers, or independent contractors are subject to internal review by PUK Management and/or Supervisors to confirm compliance with the Policy.



The Policy is to be reviewed every two (2) years by PUK Management and ratified by the Board of Directors.

PUK shall maintain appropriate records necessary to demonstrate implementation of safeguarding requirements for individuals responsible for Youth Volunteers.

Records may include:

- Authorized Adult Youth Supervisor roster;
- Screening status where applicable;
- Safeguarding training completion;
- Policy acknowledgements;
- Assigned youth programs or responsibilities;
- Documented safeguarding concerns;
- Corrective or protective actions; and
- Restrictions or removal of supervisory authority.

Safeguarding risk assessments shall specifically consider risks arising from adult-to-youth supervisory relationships, youth-to-youth interactions, virtual supervision, community partner placements, and access to youth information or communication platforms.

PUK Management shall periodically assess whether the controls established for Youth Volunteer supervision are operating effectively and whether additional safeguards are required.

XIV. General Data Protection Act (GDPR) Obligations

Although the GDPR contains exceptions to data retention in the event of child safeguarding concerns, such as details of a child protection inquiry, much of the data held by PUK will strive to comply with the data protection regulations of several countries.¹

XV. Failure to Comply/Disciplinary Action

Non-compliance with the Policy shall be taken seriously. Any PUK employee, intern, volunteer, or independent contractor who fails to comply with the Policy shall be subject to disciplinary action/formal reprimand to be noted in the personnel record. Information about substantiated child protection concerns will be conveyed in references. In the case of any violation of children's

¹ Child protection provisions are found in Articles 6, 8, 12, 40, and 57 of the GDPR. Portal reference: <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679&from=EN>



rights by an employee, intern, volunteer, or independent contractor, the case shall be referred to the designated authority and/or social services for further investigation.

Because Adult Youth Supervisors occupy positions of trust and authority, violations involving a Youth Volunteer may warrant immediate protective action.

Depending on the nature and severity of the concern, PUK may:

- Restrict or suspend access to Youth Volunteers;
- Remove supervisory responsibilities;
- Restrict technology or information access;
- Suspend the individual from PUK activities pending review;
- Terminate volunteer, internship, employment, contractor, or partner-related responsibilities;
- Notify a sponsoring institution or partner organization where appropriate; and/or
- Refer the matter to law enforcement, child protection authorities, NCMEC, or other appropriate authorities as required.

Interim protective measures may be implemented before the completion of an investigation when reasonably necessary to protect a child or Youth Volunteer.

Retaliation against a Youth Volunteer or any individual who makes or assists with a good-faith safeguarding report is prohibited and constitutes a separate violation of this Policy.