

Child Safeguarding Policy at Fluentbe

Effective from January 1, 2026.

1. Document Purpose and Scope

This document aims to:

- a. ensure the safety of all minors participating in online classes at Fluentbe
- b. establish clear rules and procedures to prevent harm to children
- c. apply to all employees, teachers, contractors, partners, and anyone acting on behalf of Fluentbe

2. Key Definitions

Minor – any person under 18 years of age.

Guardian – a parent or legal representative of a minor.

Abuse – any action or omission that threatens a child's physical, psychological, or sexual safety.

Online abuse – includes grooming, cyberbullying, sexting, unauthorised recording, or distribution of materials.

3. Safety Principles for Working with Minors Online

1. All classes must take place on official platforms and tools provided by Fluentbe.
2. Private contact with minors outside official channels is strictly prohibited. This includes personal social media accounts, private phone numbers, and personal email addresses.
3. Teachers and employees must use cameras during lessons and communicate in a professional manner appropriate to the students' age.
4. Private conversations and online meetings without parental knowledge and presence are not permitted.
5. One-to-one classes must be conducted transparently, allowing for parent/guardian observation if requested.
6. Staff must maintain secure privacy settings and are prohibited from sharing student data with third parties.

4. Identifying Threats and Warning Signs

1. We pay attention to:

- a. Sudden changes in student behaviour, such as isolation, anxiety, or avoidance of contact
 - b. Concerning posts or comments in chat conversations
 - c. Unusual statements from students
2. We respond to any warning signs and report observed threats in accordance with the reporting procedure.

5. Responding to Suspected Harm

1. How to Report a Concern

Please contact us if:

- a. You are a child who feels uncomfortable, hurt, or afraid of someone you have classes with
- b. You are a parent/guardian concerned about the behaviour of a teacher or staff member
- c. You are a Fluentbe teacher, employee or contractor with a reasonable suspicion that rules have been violated

2. Reporting procedure:

- a. All Fluentbe staff are required to respond immediately to any suspicion of harm to a minor.
- b. Report a concerning situation by email to Justyna Sojka: justyna.sojka@fluentbe.com or, especially if you prefer to stay anonymous, use the form: <https://forms.gle/gxWyrDR1KMfMWvJr7>
- c. Document all relevant information about the incident
- d. Provide as much information as you can
- e. Fluentbe employees will inform the parent or guardian appropriately, unless doing so would endanger the child
- f. Your report will be treated seriously and confidentially. You may provide your name and details of the incident, or you may remain anonymous if you prefer. All matters are handled discreetly with the safety of children as our priority.

6. Violations of Rules by Staff Members

1. When child protection rules are violated:
 - a. Teachers may be temporarily suspended from teaching
 - b. Other staff may be temporarily suspended from conducting meetings with minors
 - c. An internal investigation will be conducted to establish the facts

2. Disciplinary action may include termination of employment and reporting to the appropriate authorities

7. Code of Conduct and Ethical Principles

1. Professional boundaries
 - a. Teachers and employees working with minors must maintain relationships based on professionalism, respect, and safety at all times.
2. Prohibited behaviour:
 - a. Commenting on a student's appearance, private life, or family situation
 - b. Discussing topics inappropriate for the child's age
 - c. Any form of private contact outside official school channels, including social media, messaging apps, personal phone, or email
 - d. Developing personal relationships or suggesting any form of private connection with students
3. Required standards:
 - a. Use age-appropriate language
 - b. Maintain respectful communication
 - c. Create an atmosphere of psychological and emotional safety
 - d. Know and comply with this Child Safeguarding Policy
 - e. Respond to any signs suggesting a threat to a child's safety

8. Recruitment and Verification

1. All candidates for positions involving contact with minors must:
 - a. Submit a declaration confirming no criminal record for offences against minors
 - b. Confirm no ongoing legal proceedings related to crimes against children
 - c. Commit to immediately reporting any changes to their legal status
 - d. Acknowledge they have read and agree to follow these Child Safeguarding Policy
2. Teacher recruitment includes verification of:
 - a. Professional qualifications
 - b. Experience working with children
3. Completion of mandatory child protection training is a part of the Fluentbe onboarding program.

9. Training and Professional Development

All teachers and staff undergo regular training on child safety and safeguarding standards.

10. Data Protection and Privacy

1. Student data is processed in accordance with GDPR regulations
2. Classes may not be recorded without explicit consent from both the school and the parent/guardian
3. Sharing photographs, recordings, or personal data of minors without explicit permission is strictly prohibited

11. Monitoring and Continuous Improvement

1. Fluentbe maintains an internal incident register
2. These standards are reviewed and updated regularly
3. Staff may submit concerns or suggestions for improvement at any time

Declaration concerning the Child Safeguarding at Fluentbe

I, the undersigned, declare that:

I have read and understood the "Child Safeguarding Policy of Fluentbe Sp. z o.o." and commit to strict compliance throughout my employment with Fluentbe.

Name and Surname:

Date:

Signature:

1. Understanding of Safe Contact Principles

I understand the principles of safe contact with minors, particularly in online environments, and commit to following them.

2. Awareness of Consequences

I acknowledge that violation of child protection rules may result in immediate termination of my employment.

3. Professional Conduct

I commit to maintaining professional relationships with students and adhering to ethical principles, particularly the prohibition on private contact with minors outside official communication channels.

4. Criminal Record

I have not been convicted of any crime against minors, including but not limited to:

- Crimes against sexual freedom and morality
- Crimes against life and health
- Crimes related to sexual exploitation, pornography, or human trafficking

5. Legal Proceedings

There are no criminal, administrative, or disciplinary proceedings currently pending against me concerning crimes against minors.

6. Duty to Inform

I commit to immediately informing Fluentbe if any proceedings are initiated against me concerning crimes against minors or any matter that may affect my suitability to work with children.

7. Truthfulness

I declare that all information provided in this document is true and accurate. I understand the consequences of providing false information.

8. Data Processing Consent

I consent to the processing of my personal data as necessary for Fluentbe to fulfill its child protection obligations.

Name and Surname:

Date:

Signature: