BrainBugs Child Protection Policy

Version 1.0 - 28 / 10 / 2026
Organisation: BrainBugs BV, Boerderijstraat 107, 9000 Gent, Belgium
Approved by: Bram Allegaert, CEO (legal representative)
Date of approval: 28 / 10 / 2026
Next review: one year from approval, or earlier if triggered by an incident, legal change or new project requirement
Contact: Bram Allegaert, Child Protection Officer - bram@brainbugs.be

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1. Purpose and Commitment

BrainBugs is a Belgian serious game studio (SME) that designs and develops interactive digital tools for social innovation, frequently addressing sensitive topics such as online safety, sexual violence and gender-based violence. Our work regularly brings us into direct contact with children and adolescents - most commonly aged 14 -16 - through co-design sessions, playtesting, school visits and facilitated game sessions.

This policy sets out how BrainBugs protects every person under the age of 18 who participates in, contributes to, or plays our games. It applies fully to the development and deployment of educational games dealing with sexual violence, image-based sexual abuse (IBSA) and related topics, including our role as technical partner in EU-funded projects such as I-REACT (CERV-2026-DAPHNE).

Our commitment is simple: **no child should come to harm, or be placed at risk of harm, as a result of interacting with BrainBugs - its staff, its processes, or its products.**

2. Scope

This policy applies to:

- all activities in which BrainBugs staff, freelancers, interns or subcontractors come into contact with persons under 18, including co-design sessions, playtests, user testing, school visits, workshops, events and online interactions;
- all digital channels operated by BrainBugs through which a minor could contact us or interact with our content (website, social media, in-game communication);
- all products and services developed by BrainBugs that are designed for or accessible to minors;
- employees, interns and volunteers under the age of 18 working with BrainBugs.

Subcontractors and freelancers engaged by BrainBugs are contractually required to comply with this policy or demonstrate an equivalent policy of their own.

3. Guiding Principles

1. **The best interests of the child come first.** Where the interests of the project, the client or BrainBugs conflict with the safety of a child, the child's safety prevails - without exception.
2. **Children as partners, not subjects.** Children who co-design or test our games are active contributors. Their dignity, autonomy and voice are respected at every stage.
3. **Do no harm - including through our products.** Games about sexual violence must protect players from re-traumatisation and must never function as how-to material or trivialise abuse.
4. **Data minimisation by design.** We deliberately collect as little personal data from children as possible. Most of our work with minors requires no personally identifying data at all.
5. **We are not safeguarding professionals.** BrainBugs staff are game designers and developers, not therapists, investigators or youth-care workers. We recognise signs, respond with care, and hand over to competent authorities. We do not investigate, diagnose or intervene.
6. **Transparency.** Children and their guardians are informed, in understandable language, about what we do with their input and how we keep them safe.

4. Legal and Policy Framework

This policy is written to be compatible with:

- the **UN Convention on the Rights of the Child**, in particular the child's right to protection from violence (Art. 19), to be heard (Art. 12) and to privacy (Art. 16);
- the **EU General Data Protection Regulation (GDPR)**, including Article 8 on children's consent to information society services and Article 9 on special categories of data;
- the **EU strategy on the rights of the child** and the **EU GDPR/child-protection guidance on child-appropriate design**;
- **Belgian legislation** on child protection, youth care and the reporting/referral duties of organisations working with minors;
- national frameworks of partner countries in EU-funded consortia, where applicable;
- the requirements of EU funding programmes in the field of gender-based violence and violence against children (e.g. CERV/DAPHNE).

Note: where national procedures differ (e.g. reporting mechanisms in partner countries), the policy of the country where the activity takes place prevails, coordinated with the project consortium.

5. Governance and Responsibilities

5.1 Child Protection Officer (CPO)

The **Child Protection Officer** for BrainBugs is **Bram Allegaert (CEO)**. The deputy CPO is **Lennert Mottar**. Bram Allegaert is also the Data Protection Officer (DPO); the dual role is deliberate given the organisation's size and accepted with the safeguards below.

Responsibilities of the CPO:

- maintaining, interpreting and reviewing this policy;
- being the first point of contact for concerns, disclosures and complaints;
- deciding on escalation steps in consultation with the responsible adult or organisation of the child concerned;
- maintaining the incident log (Annex B) confidentially;
- organising the child-protection component of staff training (Section 13).

5.2 Safeguard when the CPO is the involved party

In any matter where the concern involves the CPO personally, or where the CPO has a conflict of interest, the **deputy CPO assumes the CPO role for that matter**, and - where the concern involves a member of BrainBugs staff - the case is referred without delay to the responsible authority and to the coordinator of any relevant project consortium. No BrainBugs employee investigates a concern about a colleague internally beyond establishing whether immediate protective action is needed.

5.3 All staff and freelancers

Everyone carrying out work for BrainBugs that involves contact with minors is responsible for:

- knowing and following this policy;
- completing the child-protection briefing before their first activity with minors (Section 13);
- reporting concerns or disclosures to the CPO without delay;
- conducting themselves according to the Code of Conduct (Section 7).

6. Safer Recruitment and Screening

- All staff members who regularly facilitate sessions involving minors are required to provide a **certificate of good conduct regarding natural persons** (Belgian "uittreksel strafregister model 596.2" / former model II) covering offences against minors, before their first activity with minors. The CPO records the validity date; certificates are refreshed every three years.

- Freelancers, subcontractors, interns and volunteers who participate in activities with minors are **contractually required** to provide the same certificate or an equivalent document from their country of residence.
- Purely administrative roles that involve no contact with minors require no screening.
- Job postings and onboarding materials make this policy and the screening requirement explicit.

7. Code of Conduct: Working with Minors

All staff, freelancers and subcontractors must observe the following rules. Breaches are treated seriously and may lead to removal from child-facing activities and termination of collaboration.

1. **Two-adult rule.** At least two adult BrainBugs representatives are present at every physical activity with minors. Activities are never conducted one-on-one behind closed doors. The same rule applies to online sessions: no private one-on-one video calls or chats between a single BrainBugs staff member and a minor. Online co-design or testing sessions always include at least two staff members, or take place in a group/classroom setting with a responsible adult of the partner organisation present.
2. **Physical and online boundaries.** Staff do not arrange private meetings with minors outside organised activities, do not exchange private contact details, do not connect with participating minors on personal social media accounts, and do not engage in private direct-message conversations except through official BrainBugs channels with a second staff member informed.
3. **Respectful communication.** Language, humour and imagery used with minors are age-appropriate and non-sexualising. Staff treat all participants equally regardless of gender, origin, orientation, disability or belief.
4. **No gifts or favouritism** that could create dependence or blur professional boundaries.
5. **Photography.** During sessions, only "over-the-shoulder" photography is used by default (hands, screens, room atmosphere - no identifiable faces). Any image showing a recognisable minor requires specific prior consent from that minor and their parent/guardian, and is used only for the agreed purpose.
6. **Intoxication and impairment.** No staff member attends an activity with minors while under the influence of alcohol or drugs.
7. **Duty to report.** Any concern or suspected boundary violation by anyone - including colleagues - must be raised with the CPO without delay.

8. Safe Environments and Channels

8.1 Facilitated sessions

Co-design sessions, playtests and game sessions with minors are:

- held in premises of (or arranged with) a partner organisation such as a school or youth organisation, whose responsible adults remain reachable and, where agreed, present;
- always supervised by at least two BrainBugs staff members (Section 7.1);
- announced in advance to participants and their parents/guardians, including the nature of the topics discussed.

8.2 Online channels (social media, website, DMs)

- Official BrainBugs channels (currently Instagram, Facebook, LinkedIn) are professional channels; staff do not use personal accounts for project communication with minors.
- Messages received from minors via official channels are answered **within 24 hours**.
- **If a minor discloses serious facts via direct message** (violence, abuse, self-harm), the recipient of the message does not investigate or counsel, but: acknowledges the message with care, does not promise secrecy, informs the CPO the same day, and - depending on urgency - follows the escalation ladder of Section 12 (immediate danger: emergency services; other concerns: referral to youth care/help services and, where known, the responsible adult of the minor's organisation).
- BrainBugs channels are not monitored as a help service; where appropriate, minors are signposted to appropriate helplines.

9. Data Protection and Privacy of Minors

BrainBugs applies strict data minimisation in all work involving minors. By design, **BrainBugs does not collect personal data of children.**

9.1 What we collect (and what we do not)

Category	Collected?	Notes
Audio recordings of minors	**No**	Never recorded
Video recordings of minors	**No**	Never recorded
Photos of minors	Only over-the-shoulder	Identifiable faces only with specific dual consent (Section 7.5)

Category	Collected?	Notes
Names/contact details of participating minors	**No**	Coordination runs via the partner organisation (school/youth org)
In-game data (serious game simulations)	Yes - non-identifying	Simulated scenario data (choices in fictional situations), not linked to identifiable individuals
Screenshots of gameplay	Possibly - non-identifying	For QA/reporting; screened to exclude any identifiable data
Anonymous analytics	Yes	Aggregated usage data without personal identifiers
Input from group conversations	Yes - anonymised	Documented anonymously ("participants suggested…"), without attribution to individuals
Assent/consent forms	Yes	Collected via the partner organisation where required; stored securely; never via public cloud-sharing links

9.2 Consent model

For activities in which consent is required (e.g. photography with recognisable faces, participation in specific research activities):

- BrainBugs applies **dual informed consent**: assent of the young person themselves (in child-appropriate language) **and** consent of a parent/guardian;
- both forms are provided in the young person's language (templates in Annex B);
- participation is voluntary: refusing or withdrawing consent never excludes a young person from participating in non-recorded activities, and withdrawal is possible at any time without consequences.

9.3 Storage and infrastructure

- Personal data of minors (where unavoidable, e.g. signed consent forms) is stored **only** on BrainBugs' local infrastructure or on hosting in Belgium (Combell). It is never shared through public or broadly-accessible cloud links.
- **Google Workspace is used exclusively for project administration** (planning, general project documentation, finances) and does not contain personal data of

minors. Documents containing child-related personal data are kept out of Google Workspace by internal rule.

- Retention: no raw recordings exist (Section 9.1). Signed consent forms are retained for the duration of the project plus 5 years, in line with EU grant audit requirements. Anonymised analysis output is retained for the project duration plus 5 years. Photographic material follows the purpose for which consent was given.

10. Safety of Game Content and Play Sessions

Games addressing sexual violence, IBSA or related topics follow these mandatory safeguards:

1. **Facilitated play.** Sessions with the target group are guided by trained facilitators and always followed by a **structured debriefing**. Unsupervised individual play by minors of unreleased sensitive-topic material is avoided; where the game is released for classroom use, it is embedded in a facilitated setting with teacher materials.
2. **Trigger warnings and framing.** Sensitive scenarios are announced; the game clearly signals that content addresses fictional but distressing situations.
3. **Visible escape route.** A permanently visible **exit/pause button** allows players to leave any scenario at any moment without penalty.
4. **In-game signposting to help.** The game contains visible, always-accessible references to help services and helplines appropriate to the country of deployment.
5. **No how-to risk.** Scenario design is reviewed to ensure the game cannot function as instructional material for perpetrating abuse; consequences and bystander perspectives are integral to the design.
6. **Disclosure readiness.** All facilitators are trained in the Disclosure Protocol (Annex B) because facilitated play on these topics can prompt disclosures from participants.

11. What Happens if Something Goes Wrong: Escalation Ladder

Level 1 - Concern or inappropriate incident (discomfort, boundary-crossing remark or behaviour, online incident): The facilitator logs the fact and informs the CPO within 24 hours. The CPO determines whether a conversation or corrective measure is needed. Recorded in the incident log.

Level 2 - Suspicion of abuse or violence: The CPO is informed within 24 hours and contacts - the same day - the responsible adult or safeguarding officer of the child's school or organisation, who holds the duty of care and the statutory referral routes to youth care and police. BrainBugs hands over and does not investigate.

Level 3 - Immediate danger: Protection of the child overrides all other considerations, including confidentiality. Emergency services are contacted immediately (in Belgium: 112), followed by the referral of Level 2.

In all levels: document facts (not interpretations) in the incident log within 24 hours; inform only those who need to know; never confront an alleged perpetrator.

12. Complaints and Feedback

- **For children:** BrainBugs embeds a **feedback form inside its games** (low-threshold, anonymous), allowing players to report concerns or complaints about the game or about the behaviour of staff. In addition, any participant of a facilitated session may raise a concern with any staff member, who must pass it to the CPO the same day.
- **For parents/guardians and partners:** concerns can be addressed to the CPO (bram@brainbugs.be) or, if the concern involves the CPO, to the deputy CPO.
- All complaints receive an acknowledgement within 24 hours and are handled according to the escalation ladder. Retaliation against anyone raising a concern in good faith is prohibited.

13. Training

Child protection is embedded in the **train-the-trainers programme** that BrainBugs provides for all facilitators of its serious games. Before any staff member or freelancer facilitates a session with minors, they complete this training module, which covers:

- this policy and the Code of Conduct;
- recognising signs of abuse and distress;
- the Disclosure Protocol (Annex B), including the three golden rules;
- the escalation ladder and their own role limits;
- the safety features of the specific game deployed (Section 10).

A refresher is provided annually and whenever the policy is substantially revised. Completion is recorded by the CPO.

14. Interface with Project Consortia

When BrainBugs participates as a partner in a consortium (e.g. EU-funded projects such as I-REACT under CERV-2026-DAPHNE):

- this policy governs all BrainBugs activities involving minors in that project;
- safeguarding duties towards participating minors remain anchored with the partner organisation in the country where the activity takes place, following **national procedures of that country**;
- the project coordinator is informed of the existence of this policy and is the single point of contact for cross-border safeguarding matters between partners;
- BrainBugs does not share personal data of minors with consortium partners; where project evaluation requires participant-level input, it is provided in anonymised form;

- each consortium partner remains responsible for the safeguarding compliance of its own staff and activities.

15. Review, Versions and Approval

- This policy is approved by the legal representative of BrainBugs BV and reviewed **annually**, or sooner following a serious incident, a change in legislation, or the start of a new project with an elevated risk profile.
- The current version is published on the BrainBugs website (brainbugs.be) alongside a child-friendly summary (Annex C).
- All facilitators are informed of substantive changes; the changelog below tracks versions.

Changelog

Version	Date	Author	Changes
1.0	28-10-2026	BrainBugs (with Lumo AI drafting support)	Initial version