

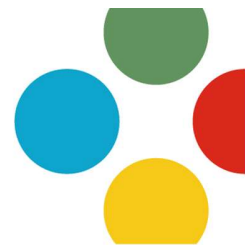


ETHICS PLAN

Project: 101252741 — FAIR GAME
CERV-2025-CHILD

Rubén García Vidal & All partners
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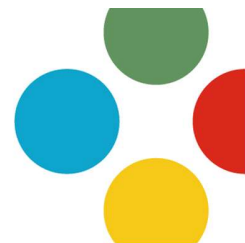


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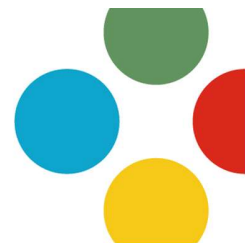
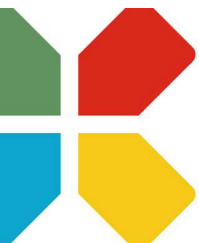
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1.0	30/04/2026	UoL & All partners	Additional information and revisions.



LIST OF PARTNERS

No	Partner	Country	Acronym
P1	UNIVERSITAT JAUME I DE CASTELLON	Spain	UJI
P2	ALL DIGITAL AISBL	Belgium	AD
P3	8D RESEARCH DESIGN IMPACT BV	Netherlands	8DG
P4	CIIM INNOVATIONS LTD	Cyprus	UoL
P5	PELASTAKAA LAPSET RY RUOTSIKSI RADDA BARNEN RF	Finland	SCF



LIST OF ABBREVIATIONS

Abbreviation	Description
Acronym	Meaning
AI	Artificial Intelligence
BIK+	Better Internet for Kids Plus
CERV	Citizens, Equality, Rights and Values Programme
D2.1	Deliverable 2.1
DMP	Data Management Plan
DSA	Digital Services Act
EEA	European Economic Area
EU	European Union
GA	Grant Agreement
GDPR	General Data Protection Regulation
UNCRC	United Nations Convention on the Rights of the Child

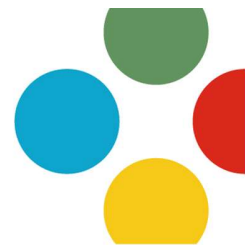
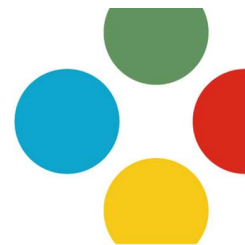


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1. INTRODUCTION

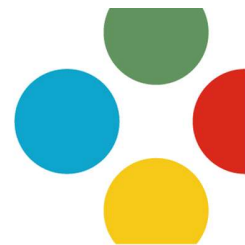
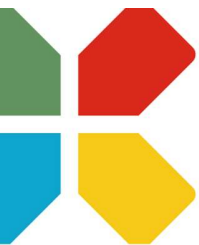
FAIR GAME is a European project (Grant Agreement No. 101252741 – CERV-2025-CHILD) aimed at advancing the protection and realisation of children’s digital rights in video game environments. The project focuses on promoting safer, more inclusive, and rights-respecting gaming spaces by combining digital literacy, child participation, awareness-raising, and dialogue with key actors in the gaming ecosystem. Through tools, co-creation activities, educational resources, and stakeholder engagement, FAIR GAME seeks to empower children as active rights-holders, support families and professionals, and encourage more responsible practices within the video game industry. Special attention is given to children aged 10 to 18, ensuring that their voices, experiences, and needs are meaningfully integrated into the project’s actions and outcomes.

1.1 Purpose and scope of the Ethics Plan

The FAIR GAME Ethics Plan constitutes a core governance instrument to ensure that all project activities are carried out in a manner that is safe, rights-based, inclusive, and fully respectful of children’s dignity, privacy, and participation. As FAIR GAME addresses children’s digital rights in video game environments and involves participatory activities with minors and multiple stakeholder groups, the Ethics Plan will function as a living document to guide the ethical implementation of the project throughout its full duration.

The Plan is a deliverable (D2.1) developed at month 3 of the project by UJI, as task 2.1 leader, and under the supervision of the Ethics Committee, which is composed of one representative from each partner organisation. This Committee, chaired by Rubén García (UJI), is responsible for monitoring compliance with ethical standards, reviewing emerging issues, and updating the Plan whenever necessary. Each partner is responsible for obtaining any ethical approvals or authorisations required at national or institutional level before implementing relevant activities.

This Ethics Plan includes a comprehensive framework for the identification, assessment, and mitigation of ethical risks. Particular attention is paid to risks associated with children’s participation in workshops, co-creation sessions, surveys, interviews, awareness activities, and dissemination actions, as well as risks linked to online engagement, digital exposure, emotional discomfort, privacy breaches, or unequal participation. For each identified risk, the Plan will define mitigation measures, responsible actors, reporting channels, and follow-up procedures.



FAIR GAME's alignment with the EU's Better Internet for Kids (BIK+) strategy and the Digital Services Act (DSA) is operationalised through this Ethics Plan. The Plan translates these European commitments into concrete ethical, organisational, and procedural measures that guide the implementation of the project. In particular, the Ethics Plan ensures that all relevant project activities reflect the principles of a digital environment where children are protected, respected, and empowered, as promoted by the Better Internet for Kids Plus (BIK+), while upholding high standards of privacy, safety, and security for minors online, as reinforced by the Digital Services Act (DSA). This includes safeguarding and child protection procedures, informed consent and assent mechanisms, privacy and data protection measures, responsible communication and dissemination involving minors, and appropriate safeguards for the use of digital and AI-based tools. As such, the Ethics Plan acts as a key instrument for ensuring that FAIR GAME's activities are not only innovative and participatory, but also fully aligned with the European child-rights and digital protection framework.

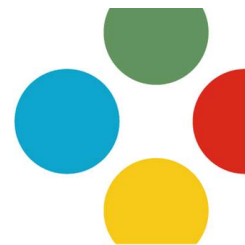
This Ethics Plan applies to all FAIR GAME partners, staff members, researchers, facilitators, volunteers, subcontractors, external experts, and any other persons acting on behalf of the project in activities involving participants, and especially in activities involving children. All persons involved in the implementation of project activities are required to comply with this Ethics Plan, the applicable national and institutional requirements, and, where relevant, the Child Protection Policy of the organisation responsible for the activity.

Where there is any difference between this Ethics Plan, a partner organisation's Child Protection Policy, institutional requirements, or national legal obligations, the more protective standard shall apply, particularly in relation to children's safety, privacy, dignity, and participation.

1.2 Ethical principles and child-rights approach

The Ethics Plan is grounded in a set of core principles that guide all FAIR GAME activities and decision-making processes. These principles include:

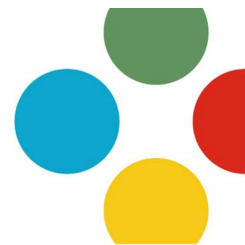
- **Respect for the dignity, rights, and best interests of the child,** recognising children as active rights-holders whose views, experiences, and needs must be heard, respected, and meaningfully considered in all project activities.



- **Protection, safety, and non-maleficence**, ensuring that all actions are designed to prevent harm, minimise risks, and provide appropriate safeguards for children in both online and offline settings.
- **Participation, inclusion, and accessibility**, promoting the meaningful involvement of children from diverse backgrounds and ensuring that project activities are inclusive, understandable, and adapted to different needs and capacities.
- **Privacy, confidentiality, and responsible data use**, guaranteeing that personal data is handled lawfully, securely, and only for clearly defined purposes, in line with applicable data protection standards.
- **Transparency, accountability, and fairness**, guiding communication, stakeholder engagement, and the use of digital or AI-based tools so that project processes remain understandable, responsible, and respectful of children's rights.
- **Safeguarding and duty of care**, ensuring that clear procedures and responsibilities are in place to prevent, identify, and respond to risks or incidents affecting children, and to provide appropriate support where needed.
- **Proportionality and data minimisation**, ensuring that any data collection, processing, or intervention is limited to what is strictly necessary for the achievement of the project's objectives and is conducted in a responsible and justified manner.

The Ethics Plan is also informed by the EU Charter of Fundamental Rights and the United Nations Convention on the Rights of the Child, particularly the principles of the best interests of the child, the right to be heard, non-discrimination, protection from harm, and respect for privacy and dignity. These principles guide the design, implementation, monitoring, and evaluation of all FAIR GAME activities involving children.

This Ethics Plan establishes safeguarding protocols for children. These protocols will set out clear rules for safe interaction with minors in both online and offline settings, including procedures for supervision, appropriate communication, confidentiality boundaries, referral pathways in case of concern, and the responsibilities of staff involved in child-facing activities. Safeguarding principles will be applied consistently across all project actions and will be aligned with child protection standards and the rights-based approach of the project.



The Ethics Plan also provides standardised informed consent and assent procedures. These Consent form templates are prepared and adapted for the different participant groups involved in the project, including children, parents or legal guardians, teachers, and video game professionals. All activities involving minors will require the prior informed consent of parents or legal representatives, together with age-appropriate assent from the child whenever applicable. For participants with special needs or in situations requiring additional protection, the relevant legal representative will also be required to sign the necessary documentation. These forms will clearly explain the purpose of participation, the voluntary nature of involvement, data use, confidentiality conditions, withdrawal rights, and contact points for questions or complaints.

Where the project involves the use of artificial intelligence or AI-related analysis, the Ethics Plan defines transparency and bias mitigation measures. The Plan also establishes precautions to identify and reduce potential bias, discrimination, or unfair treatment, especially where children's perspectives, behaviours, or digital experiences are interpreted through automated or semi-automated methods.

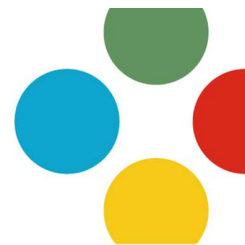
To ensure accountability and responsiveness, the Plan establishes complaint and incident reporting mechanisms. The Ethics Committee will review reported cases confidentially and ensure that appropriate corrective or preventive measures are taken. When necessary, incidents will also be escalated according to national legal requirements or institutional procedures.

The Ethics Plan further describes procedures for withdrawal from participation and for data deletion, total or partial, depending on the circumstances.

Finally, the Ethics Plan includes guidelines for communication and dissemination involving minors. These guidelines regulates the collection and use of images, videos, quotes, testimonials, and other identifiable materials, always ensuring that the dignity, safety, and best interests of the child prevail.

1.3 Reference Documents

This Ethics Plan is informed by the main legal, policy, and project documents that shape the ethical implementation of FAIR GAME, particularly in relation to children's rights, safeguarding, participation, privacy, data protection, and the responsible use of digital and AI-based tools. As reflected throughout the Plan, special relevance is given to the project's alignment with the Better Internet for Kids Plus (BIK+) strategy and the Digital Services Act (DSA), as well as to the child-rights principles drawn from the United Nations Convention on the Rights of the Child and the Charter of



Fundamental Rights of the European Union. The Plan also relies on the General Data Protection Regulation (GDPR) and is complemented by the project's Data Management Plan, which provides the technical and organisational framework for data handling, while this Ethics Plan focuses specifically on the ethical implications of data processing. In addition, the Plan is linked to the Project Management Handbook, particularly regarding the Risk Monitoring Framework, and takes into account the Child Protection Policies and the relevant national and institutional ethical requirements applicable to each partner organisation.

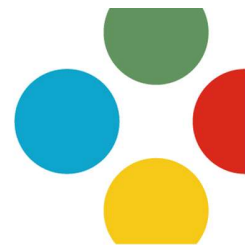
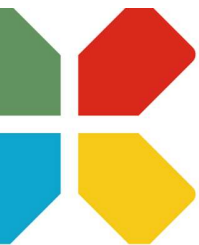
For clarity, the main reference documents considered in this Ethics Plan are the following:

- **FAIR GAME Grant Agreement** (Grant Agreement No. 101252741 – CERV-2025-CHILD)
- **Better Internet for Kids Plus (BIK+) strategy**
- **Digital Services Act (DSA)**
- **United Nations Convention on the Rights of the Child (UNCRC)**
- **Charter of Fundamental Rights of the European Union**
- **General Data Protection Regulation (GDPR)**
- **FAIR GAME Data Management Plan (DMP)**
- **FAIR GAME Project Management Handbook**, especially the **Risk Monitoring Framework**
- **Child Protection Policies of the partner organisations**
- **Relevant national and institutional ethical approval procedures and requirements** applicable in each partner country and organisation.

2. ETHICAL GOVERNANCE AND RESPONSIBILITIES

2.1 Ethics Committee

The **Ethics Committee** is the body responsible for overseeing the ethical implementation of the FAIR GAME project throughout its full duration. Its role is to ensure that all project activities are carried out in line with the ethical principles, safeguarding standards, and data protection requirements established in this Ethics Plan. The Committee supervises the correct application of consent and



assent procedures, monitors ethical risks, reviews any concerns or incidents that arise, and proposes corrective actions whenever needed. It is also responsible for reviewing and updating this Ethics Plan periodically. In addition, the Ethics Committee supports partners in addressing ethical questions related to children's participation, communication and dissemination involving minors, privacy, safeguarding, and the responsible use of digital or AI-based tools.

The Ethics Committee of FAIR GAME is composed of one representative from each partner organisation:

- **Universitat Jaume I – Rubén García (Chair)**
- **Save the Children Finland – Laura Sillanpää**
- **8D-Games – Stephan Burghout**
- **University of Limassol – Afxentis Afxentiou**
- **All Digital – Dea Kralj**

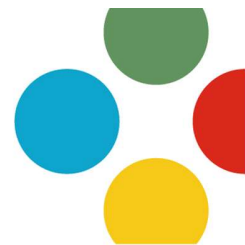
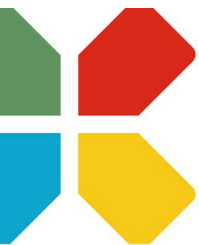
Through their nominated representative, each partner contributes to the ethical oversight of the project and to the collective review of ethical concerns, incidents, or updates needed in the implementation of the Plan.

Under the coordination of the Chair, the Ethics Committee meets periodically (every 6 months) and whenever necessary to review ethical matters related to project implementation, ensuring a consistent and rights-based approach across all partner countries and activities.

In addition to ordinary meetings, an urgent ethical review procedure may be activated where a matter requires prompt attention. This may include safeguarding concerns involving children, serious complaints, data protection incidents, risks related to communication or dissemination involving minors, or concerns linked to the use of digital or AI-supported tools. In such cases, the responsible partner informs the Chair of the Ethics Committee without unnecessary delay. The Chair may convene an extraordinary meeting or consult the relevant members of the Committee in writing, depending on the urgency and sensitivity of the matter.

Decisions and recommendations of the Ethics Committee are documented and shared with the relevant partners. Where a matter involves confidential or sensitive information, only the minimum necessary information is shared, and access is limited to those who need to know in order to ensure appropriate follow-up.

Where a member of the Ethics Committee has a direct conflict of interest in relation to a complaint, incident, or decision, that member shall not take part in the relevant



review or decision-making process. The Committee may request additional input from the project coordinator, the responsible partner organisation, a data protection officer, a safeguarding officer, or an external expert where appropriate.

2.2 Roles and responsibilities of partners

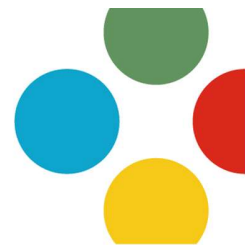
All partners share responsibility for ensuring that FAIR GAME activities are implemented in line with the ethical principles, safeguarding standards, and data protection requirements established in this Ethics Plan. Each partner is responsible for identifying any ethical issues related to the activities under its responsibility and for applying the necessary preventive and corrective measures. Partners also ensure that participation is voluntary, informed, inclusive, and safe, especially in activities involving children and other potentially vulnerable groups.

Each partner appoints one representative to the Ethics Committee, thereby contributing to the ethical oversight of the project and to the collective review of any ethical concerns, incidents, or updates needed in the implementation of the Plan. In addition, each partner is responsible for obtaining any ethical approvals, authorisations, or institutional permissions required at national or organisational level before carrying out the relevant activities.

Partners are also responsible for translating into their national languages all documents that need to be clearly understood by participants. Special attention is given to informed consent and assent forms, as these must be written in plain, accessible language, avoiding technical terms, legalistic expressions, and unnecessary jargon. This is particularly important in activities involving children, parents or legal guardians, teachers, and other participants, so that all individuals fully understand the purpose of the activity, their rights, the use of their data, and the conditions of their participation.

In addition, all partners must apply the approved consent and assent procedures, guarantee the confidentiality and secure handling of personal data, and immediately inform the Ethics Committee of any ethical concern, incident, or complaint arising during project implementation. All partners also contribute to the periodic review and updating of the Ethics Plan, helping to ensure a consistent and rights-based ethical approach across the whole project.

Partners working directly with children are responsible for ensuring compliance with their own organisational Child Protection Policy. Policies remain binding for all child-facing activities implemented under FAIR GAME. In addition



Each partner must ensure that staff, facilitators, volunteers, subcontractors, or external experts involved in activities with children are aware of and comply with the relevant Child Protection Policy, this Ethics Plan, and any applicable national or institutional safeguarding requirements.

Each partner is also responsible for ensuring that persons involved in child-facing activities have received appropriate briefing or training before the activity takes place. This includes, where relevant, training or briefing on child safeguarding, informed consent and assent, appropriate communication with minors, confidentiality boundaries, incident reporting, data protection, and safe dissemination practices.

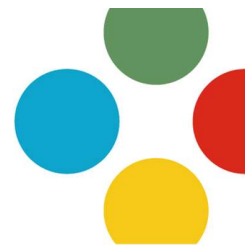
2.3 Ethical approvals and institutional requirements

Each partner is responsible for identifying and complying with the ethical approvals, authorisations, and institutional requirements applicable in its own country and organisation before implementing any project activity that requires them. No activity subject to prior ethical or institutional authorisation starts before the corresponding approval is obtained.

In practice, all partners are required to obtain approval from the relevant ethics or ethics committees at institutional and/or national level, where applicable, prior to the implementation of any activity requiring such authorisation. This may include approvals from institutional research ethics committees or national bioethics authorities, depending on the regulatory framework in each country (e.g. the Research Ethics and Integrity Committee of Universitat Jaume I or the national bioethics committee in Cyprus). All partners will follow equivalent procedures in line with the applicable legal, ethical, and institutional requirements in their respective contexts.

In addition, all partners ensure that project implementation complies not only with national regulations, but also with the relevant European legal framework, particularly in relation to children's rights, data protection, privacy, non-discrimination, and the ethical use of digital technologies. Each partner keeps appropriate records of the approvals, permissions, or authorisations obtained and informs the Ethics Committee about any relevant conditions, limitations, or changes that may affect project implementation.

The Ethics Committee monitors compliance with these requirements at project level and supports a coherent and rights-based ethical approach across the consortium.



Evidence of required approvals, authorisations, or institutional permissions shall be retained by the responsible partner and made available to the project coordinator or Ethics Committee where necessary. No activity involving children, personal data, sensitive topics, recordings, images, or other ethically relevant elements shall begin until the responsible partner has confirmed that all required approvals, permissions, consent procedures, and safeguards are in place.

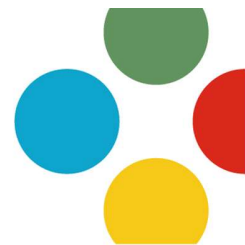
3. ETHICAL RISK ASSESSMENT AND MITIGATION

3.1 Identification of ethical risks

Given the nature of FAIR GAME, particular attention is paid to the identification of ethical risks that may arise during the implementation of project activities, especially those involving children and adolescents. Ethical risks may emerge in relation to participation in workshops, surveys, interviews, co-creation sessions, awareness activities, dissemination actions, and interactions with digital environments or video game-related content. These risks may affect participants' privacy, safety, emotional well-being, autonomy, or fair representation.

The initial ethical risks identified in the project include:

- **Insufficient understanding of participation conditions**, especially among children, if information is not presented in a clear, age-appropriate, and accessible way.
- **Inadequate consent or assent procedures**, including situations where consent is incomplete, unclear, or not properly documented.
- **Exposure of personal data or identifiable information**, particularly when collecting responses, recordings, images, or testimonies from participants.
- **Misuse of images, videos, recordings, or quotations** in communication and dissemination activities involving children or other participants.
- **Emotional discomfort or distress** when discussing personal experiences related to gaming, online risks, harmful interactions, exclusion, or digital rights violations.
- **Risks related to the participation of vulnerable children or participants with special needs**, particularly if activities are not sufficiently adapted to their capacities or circumstances.



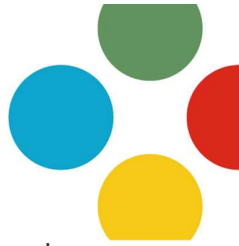
- **Unintended exclusion or unequal participation**, if project activities are not inclusive, accessible, or sensitive to different social, linguistic, or cognitive needs.
- **Safeguarding risks in online and offline interactions**, including inappropriate communication, lack of supervision, or inadequate response to concerns involving minors.
- **Lack of transparency in the use of digital or AI-based tools**, where applicable, especially if participants do not clearly understand how such tools are used.
- **Bias or unfair treatment in AI-supported or digital processes**, where applicable, including the risk of misinterpretation, discrimination, or unbalanced representation.
- **Ethical risks linked to stakeholder engagement and co-creation activities**, particularly when power imbalances exist between children and adult professionals, teachers, or industry representatives.
- **Complaint or incident underreporting**, if participants or staff do not know how to report concerns or do not feel safe doing so.

Ethical risks are identified continuously throughout the project by all partners, in coordination with the Ethics Committee. This identification process takes place before the implementation of each relevant activity and whenever new legal, technological, or contextual circumstances emerge. Once identified, risks are documented and analysed in order to define the appropriate mitigation, monitoring, and response measures.

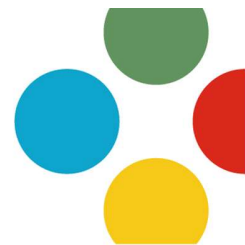
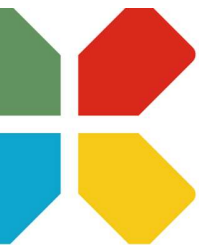
3.2 Risk prevention and mitigation measures

FAIR GAME adopts a preventive and proactive approach to ethical risk management. Once risks are identified, the consortium applies appropriate mitigation measures to reduce their likelihood and potential impact, always prioritising the rights, safety, dignity, and well-being of children and other participants. Risk prevention is integrated into the design, preparation, implementation, and monitoring of all relevant project activities.

The main prevention and mitigation measures include:



- **Use of clear and accessible information materials**, adapted to the age and profile of participants, so that children, parents, teachers, and professionals understand the purpose of the activity, their role, their rights, and the conditions of participation.
- **Application of robust consent and assent procedures**, ensuring that participation is always voluntary, informed, and properly documented before any activity starts.
- **Translation of participant-facing documents into national languages**, especially consent and assent forms, using plain language and avoiding technical, legal, or overly complex terminology.
- **Data minimisation and confidentiality measures**, ensuring that only the data strictly necessary for the activity is collected and that access is restricted to authorised personnel.
- **Secure storage and handling of personal data**, including appropriate technical and organisational measures to prevent unauthorised access, loss, or misuse of information.
- **Anonymisation or pseudonymisation of data whenever possible**, particularly in reports, internal analyses, and dissemination outputs.
- **Specific safeguards for the use of images, videos, audio recordings, and quotations**, ensuring that these materials are only collected and used when necessary and when the corresponding consent has been obtained.
- **Child safeguarding protocols for online and offline activities**, including supervision rules, appropriate conduct standards, and procedures for responding to concerns or incidents.
- **Age-appropriate and sensitive facilitation of activities**, especially when discussing potentially sensitive topics related to gaming experiences, digital harms, exclusion, or emotional well-being.
- **Adaptation of activities for vulnerable participants and those with special needs**, ensuring accessibility, inclusion, and appropriate support whenever required.



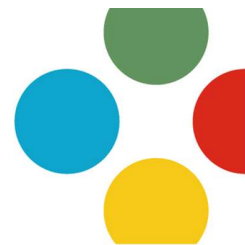
- **Measures to promote balanced and respectful participation**, particularly in co-creation and dialogue activities involving children and adult stakeholders, in order to reduce power imbalances and ensure that children's views are genuinely heard.
- **Human oversight in the use of digital or AI-based tools**, where applicable, to ensure transparency, fairness, and the possibility of identifying and correcting problematic outcomes.
- **Bias awareness and mitigation measures**, where applicable, especially in AI-supported processes or interpretative activities, in order to reduce the risk of discrimination, stereotyping, or unfair treatment.
- **Clear complaint and incident reporting channels**, so that participants, families, and staff can raise concerns safely and receive an appropriate response.
- **Regular monitoring by partners and the Ethics Committee**, allowing new risks to be identified and mitigation measures to be revised whenever necessary.

These measures are applied proportionately according to the type of activity, the profile of participants involved, and the level of ethical sensitivity identified. Risk prevention and mitigation remain an ongoing responsibility shared by all partners throughout the implementation of the project.

3.3 Monitoring and review of risks

The monitoring and review of ethical risks form part of the broader project risk management system and are carried out continuously throughout the implementation of FAIR GAME. Ethical risks are not considered static, as new issues may emerge due to changes in project activities, participant profiles, technological developments, legal requirements, or contextual circumstances. For this reason, risk monitoring is understood as an ongoing process that supports both ethical compliance and overall project quality.

All partners are responsible for monitoring the ethical risks related to the activities under their responsibility and for reporting any new risk, change in severity, incident, or concern that may require attention. Ethical risk prevention is also directly linked to the Risk Monitoring Framework described in the Project



Management Handbook. Within that framework, risk management is integrated into quality management and follows a structured assessment matrix based on:

- **Likelihood of occurrence:** Very Low / Low / Medium / High / Very High
- **Impact on the project:** Very Low / Low / Medium / High / Very High

Each identified risk is classified and recorded in the corresponding Risk Table Excel File, which serves as the project's operational tool for monitoring risks, assigning responsibilities, and defining mitigation and follow-up actions. Ethical risks are therefore managed as part of the overall project risk system, while also receiving specific attention through the Ethics Plan and the supervision of the Ethics Committee.

The monitoring and review process also includes the analysis of complaints, incidents, participant feedback, and implementation experience, as these may reveal ethical issues that were not initially foreseen. In this way, FAIR GAME maintains a responsive and adaptive ethical approach, ensuring that risk management remains active, proportionate, and aligned with the rights and protection of all participants.

4. SAFEGUARDING AND PROTECTION OF CHILDREN

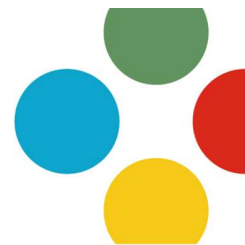
4.1 Existing Child protection policies of partner organizations

All FAIR GAME partner organisations that work directly with children have in place a Child Protection Policy, which was provided as part of the project award/acceptance process where required. These organisational policies remain binding for all child-facing activities implemented under FAIR GAME and form part of the project's safeguarding framework.

4.2 Safeguarding principles

The safeguarding approach of FAIR GAME is based on the following principles:

- **Best interests of the child** guide all decisions, actions, and procedures developed within the project.
- **Safety and protection** are prioritised in all activities involving children, both online and offline.



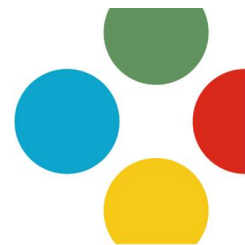
- **Respect for dignity and rights** ensures that children are treated as rights-holders whose views, privacy, and well-being must be respected.
- **Prevention of harm** underpins the design and implementation of activities, reducing exposure to physical, emotional, social, or digital risks.
- **Participation in safe conditions** promotes the meaningful involvement of children in ways that are age-appropriate, inclusive, and supported.
- **Non-discrimination and inclusion** ensure that all children, including those in vulnerable situations or with special needs, can participate safely and equitably.
- **Confidentiality and privacy** are respected in all interactions, data handling procedures, and communication practices.
- **Accountability and responsiveness** require that concerns, disclosures, or incidents are taken seriously, documented appropriately, and addressed without delay.

As minimum conduct rules, all child-facing activities shall also apply the following supervision and communication safeguards. Adults involved in FAIR GAME activities must behave respectfully and professionally towards children at all times. They must avoid any behaviour that could be perceived as intimidating, humiliating, discriminatory, overly familiar, or inappropriate.

Unsupervised one-to-one contact between an adult and a child should be avoided wherever possible. Where individual interaction is necessary for legitimate project purposes, it shall take place in a transparent, safe, and appropriate setting, in accordance with the responsible partner's Child Protection Policy and national requirements.

Online communication with children shall take place only through approved project, school, organisational, or parental/guardian-authorized channels. Project staff shall not use personal social media accounts, private messaging apps, or informal communication channels to contact children, unless this is explicitly authorised under the responsible partner's safeguarding procedures and appropriate safeguards are in place.

Partners shall ensure that appropriate adult supervision is provided during activities involving children. The level of supervision shall be proportionate to the age of the

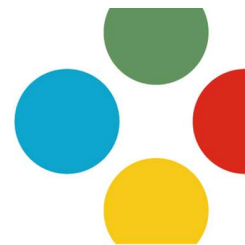


children, the format of the activity, the setting, and the level of risk identified during the activity-level ethics screening.

4.3 Protection measures in online and offline activities

To ensure the protection of children throughout the implementation of FAIR GAME, partners apply a set of concrete safeguarding measures adapted to the type of activity and context:

- **Prior risk assessment** is carried out before activities involving children, identifying any safeguarding concerns linked to the setting, format, content, or participants involved.
- **Informed consent and assent procedures** are applied before participation, ensuring that children and their parents or legal guardians understand the activity and the conditions of involvement.
- **Adult supervision and clear responsibility allocation** are ensured in all child-facing activities, whether conducted in person or online.
- **Safe and appropriate communication rules** are followed by all staff and facilitators interacting with children.
- **Age-appropriate language and facilitation methods** are used in workshops, discussions, and co-creation activities.
- **Protection of privacy and personal data** is guaranteed, particularly when children's names, images, voices, opinions, or digital experiences are involved.
- **Restricted and controlled use of images, videos, and recordings** applies to any material involving minors, and such use is only permitted with the corresponding consent.
- **Safe online environments and digital platforms** are selected for virtual activities, minimising exposure to unauthorised access, inappropriate contact, or harmful content.
- **Accessibility and inclusion measures** are adopted to ensure that children with different needs and backgrounds can participate safely and meaningfully.



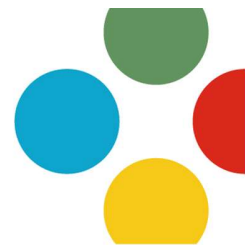
- **Balanced interaction with adult stakeholders** is promoted in activities involving teachers, professionals, families, or industry representatives, so that children's participation takes place in respectful and non-intimidating conditions.
- **Sensitive content is handled carefully**, especially where discussions may involve online harms, exclusion, problematic gaming experiences, or digital rights violations.

4.4 Procedures in case of concern or incident

If a safeguarding concern or incident arises during the implementation of FAIR GAME, partners act promptly, responsibly, and in the best interests of the child. All partners ensure that project staff know how to recognise, document, and report safeguarding concerns in accordance with the procedures established in the Ethics Plan and any applicable national or institutional requirements.

The following principles guide the response:

- **Any concern is taken seriously**, regardless of its perceived severity.
- **Immediate protection of the child** is prioritised where there is any indication of risk or harm.
- **The incident is documented appropriately**, respecting confidentiality and limiting access to those who need the information.
- **The responsible partner organisation informs the Ethics Committee without delay**, so that the situation can be reviewed and followed up appropriately.
- **National legal and institutional procedures are respected**, including any obligation to notify competent authorities or safeguarding bodies where required.
- **Supportive and proportionate follow-up measures** are adopted, depending on the nature of the concern or incident.
- **Corrective and preventive actions** are defined, when necessary, in order to reduce the risk of recurrence and improve project procedures.



Where relevant, the Ethics Committee reviews the case, provides guidance, and determines whether additional measures, updates to procedures, or revisions to the Ethics Plan are needed. In this way, FAIR GAME maintains an active safeguarding approach that not only responds to incidents but also learns from them to strengthen child protection throughout the project.

5. INFORMED CONSENT, ASSENT, AND PARTICIPATION

This section outlines the principles and procedures governing informed consent, assent, and participation within the project. It ensures that all individuals, particularly children and other vulnerable groups, are adequately informed about the nature, purpose, procedures, potential risks, and expected outcomes of their involvement, and that their participation is voluntary, explicit, and properly documented. Special attention is given to obtaining assent from minors alongside consent from their parents or legal guardians, in line with applicable legal and ethical requirements.

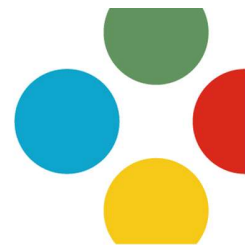
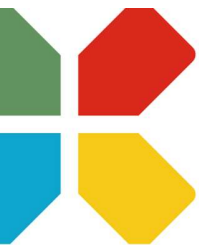
Given that legislation and institutional requirements may vary across participating countries, partners must ensure compliance with the specific national frameworks applicable in their context.

Consent may be obtained through written forms or, where appropriate, via secure online forms, provided that these meet the same standards of clarity, specificity, traceability, and data protection as traditional signed documents.

5.1 Consent procedures for adults

All adult participants involved in FAIR GAME activities, including teachers, parents, video game professionals, and other stakeholders, provide informed consent before taking part in any activity that requires it. Consent forms clearly explain the purpose of the activity, the type of participation involved, the expected duration, the use of any data collected, the confidentiality conditions, and the rights of the participant. These documents are written in clear and accessible language, avoiding unnecessary technical or legal terminology. Each partner is responsible for translating these documents into the relevant national language when necessary.

Consent must be specific, informed, freely given, documented, and withdrawable. Adult participants shall be informed that refusal to participate, or withdrawal from an activity, will not result in any negative consequences. Acceptance to participate in an event or activity does not imply consent for photography, audio or video



recording, use of quotations, or public dissemination. Where relevant, these forms of consent must be requested explicitly.

5.2 Parental/legal guardian consent for minors

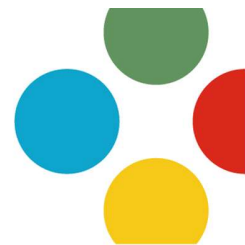
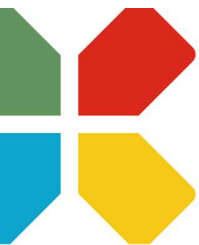
For all activities involving children, prior informed consent from parents or legal guardians is required whenever applicable under national law, institutional rules, or the nature of the activity. Parents or legal guardians receive clear information about the activity, its objectives, the type of participation expected from the child, any data collection involved, the possible use of images or recordings, and the safeguards in place to protect participants. Consent is obtained before the child takes part in the activity, and the documentation is securely stored according to the applicable data protection requirements. Consent forms shall clearly distinguish between consent for participation and consent for any additional processing or use of identifiable material, including photographs, video, audio recordings, names, quotations, testimonials, or online identifiers.

5.3 Child assent and age-appropriate information

In addition to parental or legal guardian consent, children are provided with age-appropriate information about the activity and are asked for their assent whenever relevant. This means that children are informed in a way they can understand and are given the opportunity to agree freely to participate. The project recognises that children are not passive subjects of authorisation, but active rights-holders whose willingness to participate must be respected. Information addressed to children uses plain language, avoids jargon, and is adapted to their age, maturity, and context. If a child does not wish to participate or decides to stop participating, that decision is respected.

A child's dissent or unwillingness to participate shall always be respected, even where parental or legal guardian consent has been obtained. Children shall not be pressured by adults, peers, teachers, parents, guardians, or project staff to participate or to continue participating.

Children shall be reminded, in an age-appropriate way, that they may stop participating, decline to answer a question, take a break, or withdraw from an activity without giving a reason and without negative consequences. Facilitators shall pay attention not only to verbal refusal, but also to signs of discomfort, distress, hesitation, or unwillingness to continue.



FAIR GAME recognises that children and other participants may feel pressure to participate when activities are introduced through schools, parents, teachers, youth organisations, professionals, or other authority figures. Partners shall therefore ensure that participation is presented as voluntary and that non-participation does not affect access to services, education, activities, relationships with staff, or any other benefit.

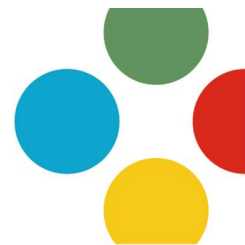
Where incentives, certificates, refreshments, reimbursement, or other forms of compensation are offered, these shall be proportionate and shall not be so significant that they could pressure or unduly influence participation. Any compensation or reimbursement shall be explained clearly and applied fairly.

5.4 Participation of vulnerable groups and accessibility considerations

FAIR GAME pays special attention to ensuring that participation is inclusive, safe, and accessible for all participants, including children in vulnerable situations and individuals with special needs. Where necessary, materials, procedures, and activities are adapted to participants' linguistic, cognitive, social, or accessibility needs in order to ensure genuine understanding and meaningful participation. In cases where additional protection is required, the involvement of legal representatives or other authorised persons is ensured in accordance with the applicable legal and institutional frameworks. Through these measures, the project promotes participation that is both ethically sound and respectful of diversity.

6. PRIVACY, DATA PROTECTION, AND CONFIDENTIALITY

Privacy, data protection, and confidentiality are essential components of the ethical framework of FAIR GAME, particularly because the project involves children, families, teachers, professionals, and other stakeholders in participatory and communication-related activities. FAIR GAME includes a dedicated Data Management Plan (DMP), which sets out in detail the procedures and technical arrangements for the collection, processing, storage, sharing, retention, and deletion of data generated throughout the project. For this reason, the present Ethics Plan does not aim to duplicate the full content of the DMP. Instead, it focuses specifically on the ethical dimensions of data handling, particularly those related to informed participation, privacy, confidentiality, minimisation of risks, protection of minors, and the responsible use of personal and potentially sensitive information. In this way, the Ethics Plan complements the Data Management Plan by ensuring that data-related practices are not only legally compliant



and technically sound, but also ethically appropriate and fully aligned with the child-rights approach of the project.

6.1 Data collection and use

FAIR GAME ensures that all personal data is processed in a lawful, fair, transparent, and secure manner, in accordance with the applicable national and European legal framework, particularly the General Data Protection Regulation (GDPR). Privacy and confidentiality are essential elements of the project's ethical approach, especially in activities involving children, families, teachers, professionals, and other stakeholders.

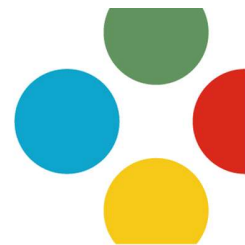
Only data that is strictly necessary for the implementation of a specific project activity shall be collected. Depending on the nature of the activity, this may include identification data, contact details, age or age range, country, participation records, consent and assent documentation, responses to questionnaires or interviews, workshop contributions, audio-visual materials, quotations, or other information voluntarily provided by participants.

The project shall avoid collecting special categories of personal data unless such collection is necessary, justified, lawful, and supported by appropriate safeguards. Where sensitive topics arise during project activities, partners shall apply data minimisation and avoid recording unnecessary personal details relating to children's private life, family situation, mental health, experiences of harm, discrimination, or other sensitive circumstances.

Participants and, where relevant, parents or legal guardians shall be informed in advance about what data is collected, for what purpose, how it is used, who has access to it, how long it is kept, whether it may be shared between partners, and how they may exercise their rights. Data shall not be used for purposes incompatible with those originally communicated to participants.

6.2 Data storage, access, and security

All partners adopt appropriate technical and organisational measures to ensure the secure storage and handling of personal data. Access to identifiable data is limited to authorised persons who need it for the implementation of the relevant activity. Personal data is stored in secure environments and protected against unauthorised access, alteration, loss, or disclosure. Each partner is responsible for ensuring that its internal data management practices comply with institutional requirements and with the broader legal framework applicable to the project.



Personal data shall be stored in secure institutional or project-approved environments. Partners shall avoid storing project personal data on unsecured personal devices, personal cloud accounts, or unauthorised platforms. Any digital platform used for collecting, storing, analysing, or transferring personal data shall be assessed by the responsible partner to ensure that it provides appropriate data protection and security safeguards.

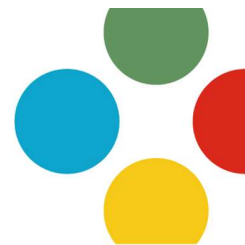
Where personal data is shared between partners, the transfer shall be limited to what is necessary and shall take place through secure channels. Any transfer of personal data outside the EU/EEA shall only take place where lawful transfer safeguards are in place and where the responsible partner has confirmed compliance with applicable data protection requirements.

6.3 Anonymisation, retention, withdrawal, and deletion procedures

Whenever possible, personal data is anonymised or pseudonymised in order to reduce risks to participants and protect confidentiality. Identifiable information is only retained for as long as necessary for the purpose for which it was collected, and always in accordance with applicable legal, ethical, and institutional requirements. Participants are informed of their right to withdraw from participation and, where applicable, to request the deletion of their personal data. Such requests are handled by the responsible partner in line with the project procedures and the legal framework in force. Where data has already been fully anonymised, deletion may no longer be technically possible, and this is explained clearly to participants in advance.

Identifiable information shall only be retained for as long as necessary for the purpose for which it was collected, and always in accordance with applicable legal, ethical, institutional, and project requirements. Each partner shall define and document the retention period applicable to the data it collects, including consent forms, contact details, raw recordings, transcripts, survey data, images, and dissemination materials.

Where raw audio or video recordings are transcribed, anonymised, or no longer needed, partners shall assess whether the original recording should be deleted in order to reduce risk. Identifiable data used only for administrative, or consent-management purposes shall be stored separately from activity data and deleted when no longer required.



7. AI TRANSPARENCY AND FAIRNESS MEASURES

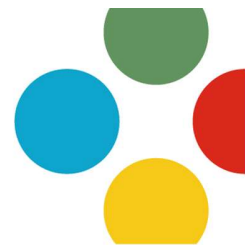
This section applies only where FAIR GAME uses AI-supported or automated tools in connection with project activities, participant-generated content, communication materials, analysis, translation, summarisation, educational tools, or other project outputs. If no AI-supported tools are used in a specific activity, this section does not create an obligation to use such tools. Any proposed use of AI shall be assessed before implementation to determine whether it is necessary, proportionate, lawful, transparent, and compatible with the rights and best interests of children.

7.1 Human oversight

Where relevant, FAIR GAME applies a cautious, transparent, and rights-based approach to the use of artificial intelligence and other digital tools. Any use of AI or AI-supported tools within FAIR GAME remains under meaningful human oversight. Final responsibility for decisions, interpretations, and outputs always lies with the project partners and not with the digital system itself. Human oversight is especially important in activities involving children's participation, analysis of contributions, communication content, or any process in which automated outputs may shape how children's views or experiences are interpreted.

To ensure appropriate oversight, the project applies the following measures:

- **AI tools are used only for clearly defined purposes** connected to the project activities.
- **Human review is required before using or sharing relevant outputs**, especially where such outputs may influence project conclusions, communication materials, or stakeholder engagement.
- **No important decision affecting participants is based solely on automated processing.**
- **Partners assess whether an AI-supported output is accurate, appropriate, and ethically acceptable** before relying on it.
- **Children's views, testimonies, and contributions are not reduced to automated interpretations without human contextual assessment.**
- **Any potentially problematic, misleading, or harmful output is corrected, discarded, or revised by the responsible partner.**



This approach ensures that technology supports project implementation without replacing professional judgement, ethical responsibility, or child-centred decision-making.

7.2 Transparency towards participants

FAIR GAME promotes transparency in relation to the use of AI and other digital tools, particularly when such tools are used in activities involving participants' data, content, or interactions. Participants have the right to understand, in an accessible way, whether AI-related tools are used in the project and what their role is.

Transparency towards participants includes, where applicable:

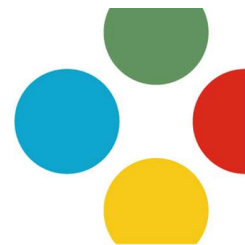
- informing participants that an AI-supported tool is being used,
- explaining the purpose of its use in clear and understandable language,
- clarifying the limits of the tool and the fact that human oversight remains in place,
- explaining whether personal data or participant-generated content is processed through such tools,
- providing information on relevant rights related to privacy, withdrawal, and data protection.

In activities involving children, this information is adapted to their age and level of understanding. Parents or legal guardians also receive clear information when consent is required. The project avoids technical descriptions that participants cannot reasonably understand and instead uses plain language that allows them to make informed choices about participation.

Transparency is particularly important in order to:

- avoid confusion about how outputs are generated,
- prevent misplaced trust in automated systems,
- support informed consent,
- reinforce accountability and ethical confidence in the project.

7.3 Bias mitigation and responsible use



FAIR GAME recognises that AI and digital tools may reproduce or amplify bias, including bias related to age, gender, language, culture, disability, social background, or patterns of digital participation. For this reason, the project adopts a responsible use approach that seeks to reduce the risk of discrimination, stereotyping, exclusion, or unfair interpretation.

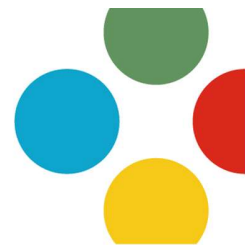
Bias mitigation and responsible use are supported through the following actions:

- **careful selection of tools**, prioritising those that are appropriate for the project context and do not create disproportionate ethical risks;
- **critical review of outputs**, especially when they relate to children's perspectives, behaviours, or contributions;
- **attention to linguistic and cultural diversity**, so that tools do not disadvantage participants from different backgrounds;
- **avoidance of over-reliance on automated categorisation or interpretation**, particularly in sensitive or participatory contexts;
- **identification of potentially unfair, stereotypical, or inaccurate outputs**, followed by human correction or non-use of such material;
- **proportionate use of AI**, ensuring that these tools are only used when they provide real added value and do not compromise participants' rights or dignity;
- **ongoing reflection within the consortium and the Ethics Committee** on the ethical appropriateness of AI-supported practices.

Where a tool is considered insufficiently transparent, potentially biased, or ethically inappropriate for the activity concerned, its use is limited, reconsidered, or discontinued. In this way, FAIR GAME ensures that innovation does not prevail over fairness, accountability, and the protection of children's rights.

7.4 AI use register and prohibited uses

FAIR GAME shall maintain an internal AI use register where AI-supported tools are used for project purposes. The register shall record the tool used, the purpose of use, the partner responsible, the type of data or content processed, whether personal data is involved, whether children's data or contributions are involved, the safeguards applied, and whether human review is required before outputs are used.



Children's personal data, identifiable quotations, images, audio recordings, video recordings, usernames, or other identifiable material shall not be entered into public or unauthorised AI tools unless this has been specifically assessed and approved under the project's ethics and data protection procedures.

AI-supported tools shall not be used to make decisions affecting children or other participants without meaningful human oversight. The project shall not use AI tools for profiling children, ranking children, predicting individual behaviour, assessing vulnerability, or making individual-level judgements about children's gaming habits, mental health, family situation, risk status, or personal characteristics.

Where AI-supported outputs are used in project deliverables, communication, analysis, or educational materials, partners shall ensure that the outputs are reviewed by a competent person before use and that inaccurate, biased, discriminatory, misleading, or inappropriate outputs are corrected, discarded, or replaced.

8. COMPLAINT AND INCIDENT REPORTING MECHANISMS

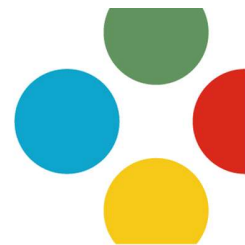
8.1 Reporting channels

FAIR GAME establishes clear procedures for reporting, handling, documenting, and following up on ethical concerns, complaints, and incidents that may arise during project implementation. These mechanisms support accountability, participant protection, and continuous improvement of project practices.

All partners ensure that participants and relevant stakeholders know how to report a concern, complaint, or incident related to the project. Reporting channels are communicated clearly in participant information materials, consent forms where relevant, and internal project guidance. Furthermore, the contact details of the designated person/bodies responsible for receiving and handling ethics-related concerns and complaints are systematically provided to all participants and, in the case of children, to their parents or legal guardians, ensuring a clear, accessible, and accountable point of contact.

Reports may be made through the following channels:

- **directly to the responsible partner organisation** carrying out the activity,
- **to the partner's representative in the Ethics Committee,**
- **to the project coordination team,** where necessary,



- **through internal institutional or safeguarding channels**, when these apply under the partner's own procedures.

Reporting channels are designed to be:

- **clear**, so participants understand where to turn;
- **accessible**, including for children and families where relevant;
- **confidential**, with information shared only with those who need to know;
- **responsive**, so that concerns are not ignored or unnecessarily delayed.

In activities involving children, partners ensure that reporting routes are explained in a way that is age-appropriate and understandable, and that children know they can raise concerns safely.

Reporting channels shall include child-friendly and parent/guardian-accessible routes where activities involve children. Children shall be informed, in age-appropriate language, whom they can speak to if they feel uncomfortable, unsafe, upset, or treated unfairly during a project activity.

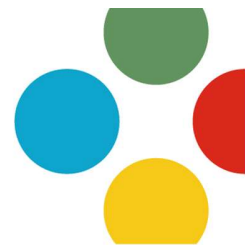
Partners shall ensure that reporting information is not only included in formal documents but also communicated clearly at the start of relevant activities. Where appropriate, facilitators shall remind participants that they may raise concerns during or after the activity.

8.2 Complaint handling and response procedures

Once a complaint or incident is reported, the responsible partner examines the matter without delay and takes the initial steps necessary to protect those involved, especially where a child may be at risk. The response given depends on the nature, seriousness, and urgency of the situation, but always follows the principles of confidentiality, proportionality, accountability, and child protection.

Complaint handling and response procedures include the following actions:

- **acknowledging the report and assessing its urgency;**
- **taking immediate protective measures if there is a possible risk to a child or another participant;**
- **informing the Ethics Committee** when the matter has ethical relevance or requires consortium-level review;



- **referring cases to the Ethics Committee for discussion and guidance** when the matter has ethical relevance or requires consortium-level review;
- **following national or institutional safeguarding, legal, or data protection procedures where applicable;**
- **ensuring that the response respects confidentiality and avoids unnecessary exposure of those involved;**
- **providing follow-up in a timely manner**, including clarification, resolution steps, or referral where appropriate.

Depending on the type of complaint or incident, the response may involve:

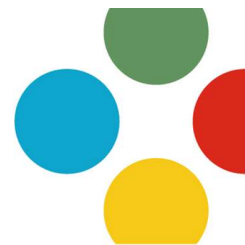
- review of the activity or material concerned,
- temporary suspension of an activity,
- revision of procedures or communication content,
- additional safeguards,
- referral to competent institutional or national authorities,
- consultation with the Ethics Committee for further guidance.

Complaints and incidents shall be handled according to their nature and urgency. Ethical concerns, safeguarding concerns, and data protection incidents may require different response routes, and partners shall apply the relevant organisational, institutional, national, and project procedures.

Where a complaint or incident involves a possible risk to a child, immediate protective action shall take priority over ordinary administrative review. Where a complaint or incident involves a possible personal data breach, the responsible partner shall follow its data breach procedure and consult the relevant Data Protection Officer or data protection contact where required.

8.3 Documentation and corrective actions

All complaints and incidents are documented appropriately by the responsible partner, in accordance with confidentiality requirements and applicable legal obligations. Documentation supports transparency, follow-up, and learning, and helps the consortium identify patterns or recurring issues that may require broader corrective action.



The documentation process includes, where relevant:

- **the date and nature of the complaint or incident,**
- **the activity or context in which it occurred,**
- **the persons or groups involved, where disclosure is appropriate and necessary,**
- **the immediate actions taken,**
- **the follow-up measures adopted,**
- **whether the Ethics Committee was informed or involved,**
- **the final outcome or status of the case.**

Based on the analysis of complaints and incidents, corrective actions may include:

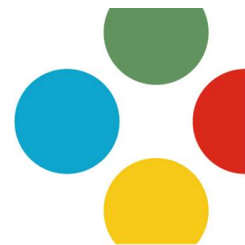
- revision of consent procedures or participant information materials,
- strengthening of safeguarding measures,
- additional guidance for staff or facilitators,
- modification of dissemination practices,
- changes in data handling procedures,
- review or discontinuation of a digital or AI-based tool,
- update of the Ethics Plan or of the project Risk Table Excel File.

In this way, complaint and incident reporting is not limited to reactive management. It also contributes to prevention, organisational learning, and the continuous strengthening of ethical practice across FAIR GAME.

9. COMMUNICATION AND DISSEMINATION INVOLVING MINORS

9.1 Use of images, videos, and quotations

FAIR GAME ensures that all communication and dissemination activities involving children are carried out in a careful, respectful, and rights-based manner. As the project gives visibility to children's perspectives and participation, special attention is paid to protecting their dignity, privacy, safety, and best interests in any public or



internal communication material.

Images, videos, audio recordings, quotations, and testimonials involving children are only collected and used when they are clearly relevant to the objectives of the project and when their use is ethically justified. Partners assess in each case whether the inclusion of identifiable material is necessary or whether the same communication objective can be achieved with less exposure of the child.

When using such materials, partners apply the following precautions:

- **Only relevant and appropriate material is collected**, avoiding unnecessary recording or documentation of children.
- **The level of identifiability is minimised whenever possible**, especially in public dissemination materials.
- **Sensitive contextual information is avoided**, particularly if it may reveal personal circumstances, vulnerabilities, or experiences that could place the child at risk.
- **Quotations and testimonials are used faithfully and responsibly**, without altering the meaning of children's words or taking them out of context.
- **Images and recordings are selected carefully**, ensuring that they do not expose children to embarrassment, negative judgement, or unwanted visibility.
- **The use of audiovisual material is limited to the purposes clearly communicated in advance**, and it is not extended to other channels or uses without proper authorisation.

Whenever possible, project communication gives preference to safer forms of representation, such as:

- group images rather than individual close-ups,
- non-identifiable visual materials,
- anonymous or pseudonymised quotations,
- illustrations or visual alternatives that reduce direct exposure.

9.2 Consent requirements for dissemination



Any use of images, videos, quotations, recordings, or other identifiable material involving minors for communication or dissemination purposes requires prior informed consent from parents or legal guardians and, where appropriate, the assent of the child. This requirement applies to all dissemination channels, including printed materials, reports, project websites, social media, newsletters, presentations, conferences, and promotional videos.

Consent procedures for dissemination ensure that participants and their families understand:

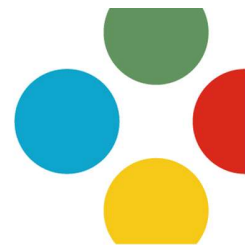
- what type of material is being collected,
- for what purpose it will be used,
- where it may be published or displayed,
- who may have access to it,
- for how long it may remain available, and
- what rights they have regarding withdrawal, modification, or deletion, where applicable.

No partner publishes or circulates material involving minors unless the corresponding consent requirements have been fully met and properly documented. In addition, if the context of use changes substantially, partners assess whether renewed consent is needed.

Where dissemination material remains available online, participants and parents/legal guardians shall be informed that complete removal may not always be possible once material has been shared publicly, downloaded, reposted, archived, or circulated by third parties. This limitation shall be explained clearly before dissemination consent is obtained.

9.3 Safe and respectful representation of children

All partners ensure that children are represented in a safe, respectful, accurate, and empowering manner in all project communication and dissemination activities. The project avoids representations that reduce children to passive subjects, exaggerate vulnerability, or use their participation in a symbolic or tokenistic way. Instead, communication materials present children as individuals with rights, perspectives, and agency, while always respecting their age, evolving capacities, and need for protection.



In practice, this means that communication involving minors avoids:

- stigmatising or stereotypical portrayals,
- sensationalist narratives,
- infantilising or patronising language,
- representation that could expose children to criticism, ridicule, or online harm,
- unnecessary references to personal difficulties, emotional vulnerabilities, or harmful experiences,
- content that may compromise the dignity or future privacy of the child.

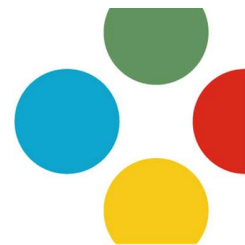
Particular care is taken when communication refers to children's experiences related to:

- online harms,
- digital exclusion,
- problematic gaming experiences,
- discrimination,
- emotional well-being,
- rights violations in digital environments.

In these cases, the project ensures that communication remains informative and respectful without exposing any child to embarrassment, judgement, or further harm.

To promote safe and respectful representation, partners apply the following actions:

- **review dissemination materials before publication**, especially when minors are involved;
- **check that the selected content matches the scope of the consent obtained**;



- **avoid including unnecessary identifying details**, such as full names, locations, schools, or personal histories, unless specifically justified and authorised;
- **use balanced and empowering language** that reflects children’s participation without overexposing them;
- **prioritise the best interests of the child** over communication or visibility objectives;
- **consult the Ethics Committee when doubts arise** regarding the appropriateness of specific dissemination content.

Through these measures, FAIR GAME promotes communication that gives visibility to children’s voices and contributions while fully respecting their rights, dignity, privacy, and protection. In this way, dissemination becomes not only a project requirement, but also an ethical responsibility aligned with the overall child-rights approach of the project.

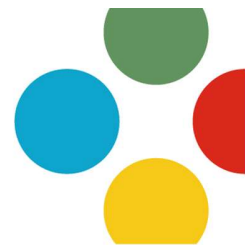
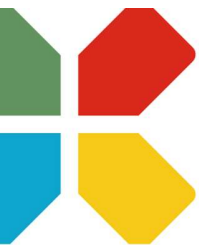
10. MONITORING AND UPDATING OF THE ETHICS PLAN

The FAIR GAME Ethics Plan is conceived as a living document that supports the ethical implementation of the project throughout its full duration. As project activities evolve and new legal, technological, organisational, or contextual circumstances emerge, the Plan needs to remain responsive and up to date. For this reason, its monitoring and revision form part of the overall ethical governance of the project and are closely linked to the work of the Ethics Committee, the project coordination process, and the broader risk monitoring framework described in the Project Management Handbook.

The purpose of this monitoring process is not only to verify compliance with the principles and procedures already established, but also to identify areas that may require clarification, strengthening, or adaptation. This is particularly important in a project such as FAIR GAME, which involves children, digital environments, participatory activities, communication actions, and, where relevant, the use of AI-related tools.

10.1 Periodic review

The Ethics Plan is reviewed periodically during the lifetime of the project in order to ensure that it remains relevant, applicable, and aligned with the actual implementation of FAIR GAME activities. This review process will take place at least



every 6 months, during Ethics Committee meeting, and it will take into account the experience gained through project implementation, the monitoring of ethical risks, any complaints or incidents reported, the evolution of dissemination activities involving minors, and any changes in the legal or institutional framework that may affect the project.

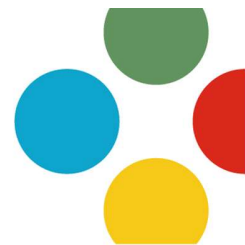
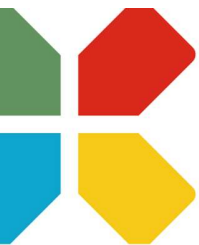
The periodic review focuses in particular on:

- **the adequacy of the ethical principles and procedures** established in the Plan;
- **the correct application of consent, assent, safeguarding, and data protection measures;**
- **the emergence of new ethical risks or changes in previously identified risks;**
- **the functioning of complaint and incident reporting mechanisms;**
- **the appropriateness of communication and dissemination practices involving minors;**
- **the ethical implications of any digital or AI-based tools used within the project;**
- **the consistency of the Plan with national, institutional, and European requirements.**

This review is carried out with the involvement of the Ethics Committee and the project partners, who contribute information from the activities under their responsibility. In this way, the review process reflects both consortium-level oversight and the practical realities of project implementation in each partner country.

In addition to the periodic review, the Ethics Plan may be reviewed earlier where a significant ethical concern, safeguarding incident, data protection issue, change in project methodology, new type of activity, new use of AI-supported tools, or change in legal or institutional requirements arises. This ensures that the Plan remains responsive to the actual risks and needs of the project.

10.2 Procedures for updates and revisions



When the periodic review process, risk monitoring, or project implementation experience reveals the need for changes, the Ethics Plan is updated accordingly. Updates may also be necessary in response to:

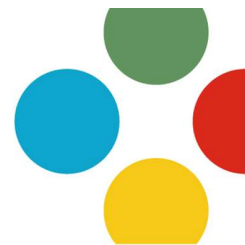
- new ethical risks or safeguarding concerns,
- complaints, incidents, or lessons learned from implementation,
- changes in national or European legal requirements,
- new institutional requirements or ethical approvals,
- changes in project activities, methodologies, or target group involvement,
- the introduction or modified use of digital or AI-based tools.

The procedure for updates and revisions follows a structured approach:

- **partners identify and communicate the need for a revision** when an issue, gap, or new circumstance is detected;
- **the matter is examined by the Ethics Committee**, which assesses the relevance and scope of the proposed change;
- **the revised content is discussed and agreed within the consortium when necessary**, especially if the update affects several partners or core project procedures;
- **the updated version of the Ethics Plan is recorded and shared with all partners**;
- **partners implement the revised provisions in their activities and documentation**, including participant-facing materials where relevant.

Where an update affects consent forms, safeguarding procedures, communication rules, or other operational documents, the corresponding templates and guidance materials are also revised. Each partner is responsible for ensuring that updated participant-facing documents are translated into the relevant national language when needed and remain written in clear, accessible, and plain language.

Through this monitoring and revision process, FAIR GAME ensures that the Ethics Plan remains an active and practical tool, capable of guiding the project in a consistent, responsible, and rights-based way from beginning to end.



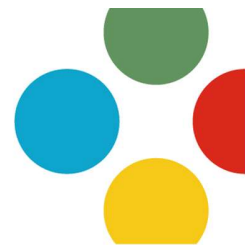
11. ANNEXES

11.1 Consent and assent template for minors

11.2 Consent and assent template for adults

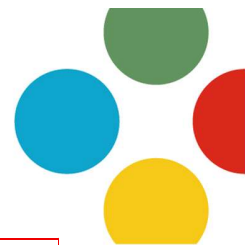
11.3 Complaint/incident reporting form

The annexes included in this Ethics Plan provide common templates and practical supporting documents to facilitate the ethical implementation of FAIR GAME activities across the consortium. These templates are intended to serve as a shared basis for project use, but they are not applied automatically or identically in all cases. Each partner is responsible for adapting the relevant template to the specific type of activity to be carried out, taking into account its purpose, format, participant profile, ethical sensitivities, and national or institutional requirements. In particular, each document shall include the relevant information about the activity concerned, the type of data to be collected or processed, the purpose of such data processing, and the identification and contact details of the person or organisation responsible for the activity. In addition, all participant-facing templates, especially those related to informed consent, assent, complaints, or data-related rights, shall be translated into the relevant national language and written in clear, accessible, and plain language so that participants can understand them properly.

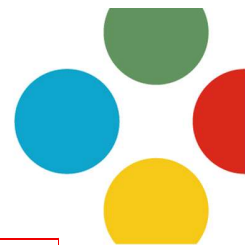


CONSENT FORM for minors (parent/legal guardian consent and child assent)

Project title	FAIR GAME: Advancing Children’s Rights in Online Gaming Environments
Activity covered by this consent form	Participation of a minor in FAIR GAME activities such as workshops, co-design or co-creation sessions, focus groups, interviews, questionnaires, awareness sessions, pilot actions, or similar participatory activities related to children’s rights in online gaming environments.
Project purpose and brief description	FAIR GAME aims to advance the protection and realisation of children’s rights in online gaming environments. The project promotes digital literacy, mental well-being, safe participation, and rights-based practices across the gaming ecosystem. Children and young people may be invited to share their views and experiences in structured and age-appropriate activities so that project materials, recommendations, and other outputs reflect their lived realities.
Duration of the project	24 months [01/02/2026 – 31/01/2028].
Possible risks or inconvenience	No significant physical risks are expected. Participation involves only voluntary contribution through discussion, feedback, or short data collection activities. Some topics may relate to online gaming experiences and may cause mild discomfort or embarrassment. Participants may skip any question, pause participation, or



	<p>withdraw at any time without negative consequences. Activities will be conducted in a safe, respectful, and age-appropriate environment.</p>
Data that may be collected	<p>Only the data necessary for the relevant activity will be collected. This may include the participant's age group, country, role in the activity, responses to questionnaires, opinions shared during discussions, and notes produced during participatory sessions. Photographs, audio, and/or video recordings will only be collected if separately authorised below. Special category data will not be intentionally collected unless strictly necessary, ethically approved, and accompanied by specific safeguards and explicit consent.</p>
Who will access the data and for how long	<p>Access will be limited to authorised members of the FAIR GAME consortium and, where necessary, authorised evaluators, auditors, or public authorities acting under legal obligations. Data will be handled confidentially and in accordance with the GDPR and applicable national legislation. Personal data will be kept only for as long as necessary for the purposes of the project and any mandatory retention obligations, and will then be securely deleted or irreversibly anonymised.</p>
Benefits for participants	<p>Participants may benefit from taking part in a meaningful process that gives children and young people a voice in shaping safer and more rights-respecting gaming environments. They</p>

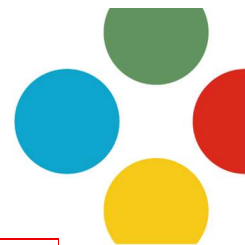


	may also increase their awareness of digital rights, online safety, participation, and well-being in gaming contexts.
Right to withdraw	Participation is entirely voluntary. The participant and/or their parent or legal guardian may withdraw consent at any time, without giving a reason and without any negative consequences. Upon withdrawal, any identifiable personal data not yet anonymised will be deleted where feasible, unless retention is required by law or the data have already been irreversibly anonymised.
Contact for information	Dr. Inmaculada Remolar Quintana Assistant Professor at the Universitat Jaume I remolar@uji.es
Contact for complaints or ethical concerns	Rubén García Vidal Project Manager, Universitat Jaume I vidalr@uji.es

Declarations and specific consents

Please tick YES or NO for each statement below.

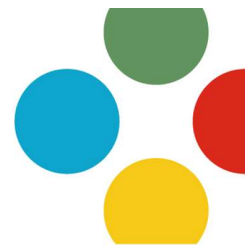
Consent statement	YES	NO
I confirm that I have read and understood the information provided in this form.	<input type="checkbox"/>	<input type="checkbox"/>
I understand the purpose of the FAIR GAME activity and what participation involves.	<input type="checkbox"/>	<input type="checkbox"/>
I understand that participation is voluntary	<input type="checkbox"/>	<input type="checkbox"/>



Consent statement	YES	NO
and that the minor may stop participating at any time without negative consequences.		
I understand how the participant's personal data will be handled.	<input type="checkbox"/>	<input type="checkbox"/>
I give permission for the minor named below to participate in the FAIR GAME activity.	<input type="checkbox"/>	<input type="checkbox"/>
I authorise the use of photographs of the minor for project communication and dissemination purposes.	<input type="checkbox"/>	<input type="checkbox"/>
I authorise audio recording of the minor for research and project implementation purposes only.	<input type="checkbox"/>	<input type="checkbox"/>
I authorise video recording of the minor for research and project implementation purposes only.	<input type="checkbox"/>	<input type="checkbox"/>

Child assent (to be completed by the minor, where age and maturity make this appropriate)

- I have had the activity explained to me in a way I can understand.
- I know that taking part is my choice.
- I know that I can stop at any time or skip any question.
- I want to take part in this activity.



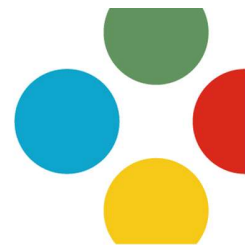
Parent / legal guardian

Surname(s):		Name:	
Signature:		Date:	

Minor participant

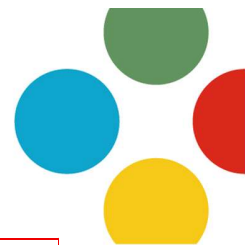
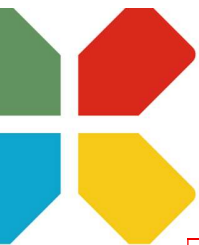
Surname(s):		Name:	
Signature:		Date:	

Note: This template should be reviewed and, where necessary, adapted by each partner organisation to comply with applicable national requirements, ethics approvals, safeguarding procedures, and institutional data protection rules.

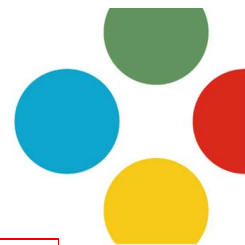


CONSENT FORM For adults

Project title	FAIR GAME: Advancing Children's Rights in Online Gaming Environments
Activity covered by this consent form	Participation of an adult in FAIR GAME activities such as workshops, co-design or co-creation sessions, focus groups, interviews, questionnaires, roundtables, awareness sessions, pilot actions, or similar project activities related to children's rights in online gaming environments.
Project purpose and brief description	FAIR GAME aims to advance the protection and realisation of children's rights in online gaming environments. The project promotes digital literacy, mental well-being, meaningful participation, and rights-based practices across the gaming ecosystem. Adults participating in the project may contribute professional, parental, educational, community, industry, or personal perspectives to help improve project outputs and recommendations.
Duration of the project	24 months [01/02/2026 – 31/01/2028].
Possible risks or inconvenience	No significant risks are expected. Participation is limited to voluntary contribution through discussion, feedback, or short data collection activities. Some questions may relate to online safety, gaming practices, or experiences involving children and may cause minor discomfort. Participants may skip any question or withdraw at



	any time without any negative consequences.
Data that may be collected	Only the data necessary for the relevant activity will be collected. This may include name and contact details where needed for organisational purposes, professional role or stakeholder category, country, and the participant's responses, views, or feedback gathered through project activities. Photographs, audio, and/or video recordings will only be collected if separately authorised below. Special category data will not be intentionally collected unless strictly necessary, ethically approved, and accompanied by appropriate safeguards.
Who will access the data and for how long	Access will be limited to authorised members of the FAIR GAME consortium and, where necessary, authorised evaluators, auditors, or public authorities acting under legal obligations. Data will be handled confidentially and in accordance with the GDPR and applicable national legislation. Personal data will be kept only for as long as necessary for the purposes of the project and any mandatory retention obligations, and will then be securely deleted or irreversibly anonymised.
Benefits for participants	Participants may contribute to a European project with social relevance and help shape safer, more inclusive, and more rights-respecting gaming environments for children. They may also gain insights into children's digital

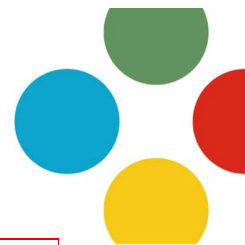


	rights, participation, and well-being in gaming contexts.
Right to withdraw	Participation is entirely voluntary. You may withdraw your consent at any time, without giving a reason and without any negative consequences. Upon withdrawal, any identifiable personal data not yet anonymised will be deleted where feasible, unless retention is required by law or the data have already been irreversibly anonymised.
Contact for information	Dr. Inmaculada Remolar Quintana Assistant Professor at the Universitat Jaume I remolar@uji.es
Contact for complaints or ethical concerns	Rubén García Vidal Project Manager, Universitat Jaume I vidalr@uji.es

Declarations and specific consents

Please tick YES or NO for each statement below.

Consent statement	YES	NO
I confirm that I have read and understood the information provided in this form.	<input type="checkbox"/>	<input type="checkbox"/>
I understand the purpose of the FAIR GAME activity and what participation involves.	<input type="checkbox"/>	<input type="checkbox"/>
I understand that participation is voluntary and that I may withdraw at any time without negative consequences.	<input type="checkbox"/>	<input type="checkbox"/>

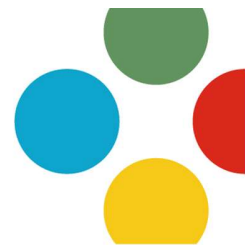


Consent statement	YES	NO
I understand how my personal data will be handled.	<input type="checkbox"/>	<input type="checkbox"/>
I consent to participate in the FAIR GAME activity.	<input type="checkbox"/>	<input type="checkbox"/>
I authorise the use of photographs of me for project communication and dissemination purposes.	<input type="checkbox"/>	<input type="checkbox"/>
I authorise audio recording of me for research and project implementation purposes only.	<input type="checkbox"/>	<input type="checkbox"/>
I authorise video recording of me for research and project implementation purposes only.	<input type="checkbox"/>	<input type="checkbox"/>

Participant

Surname(s):		Name:	
Signature:		Date:	

Note: This template should be reviewed and, where necessary, adapted by each partner organisation to comply with applicable national requirements, ethics approvals, safeguarding procedures, and institutional data protection rules.



Complaint and Incident Reporting Form

This form is used to report any ethical concern, complaint, or incident related to the FAIR GAME project, including issues related to safeguarding, consent, privacy, dissemination involving minors, inappropriate conduct, or the use of digital or AI-based tools. All reports are handled confidentially and in accordance with the FAIR GAME Ethics Plan.

1. BASIC INFORMATION

Date: _____
Partner organisation: _____
Name of person reporting: _____
Role: _____
Contact details: _____

2. TYPE OF REPORT

Please mark the relevant category:

- Ethical concern
- Complaint
- Safeguarding concern involving a child
- Data protection or privacy issue
- Consent or assent issue
- Inappropriate conduct
- Misuse of image, video, audio, or quotation
- Issue related to digital or AI-based tools
- Other: _____

3. DESCRIPTION OF THE ISSUE

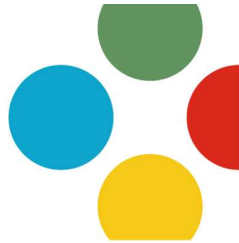
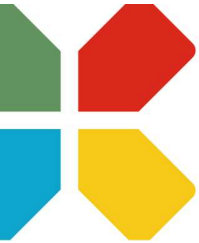
Date of incident/concern (if different from reporting date): _____

Activity or context in which it occurred:

Brief description of the issue:

4. PERSONS INVOLVED

Who is involved?



Does the issue involve a minor? Yes No

5. IMMEDIATE ACTIONS TAKEN

Indicate any action already taken:

6. FOLLOW-UP NEEDED

What action or response is needed?

7. ADDITIONAL INFORMATION

Please use this space to explain any relevant detail not covered in the previous sections:

8. SIGNATURE

Name: _____

Signature: _____

Date: _____

Internal Follow-up (to be completed by partner / Ethics Committee)

Received by: _____

Date received: _____

Action taken:

Ethics Committee informed: Yes No

Case closed on: _____