

Protocol for the Protection of Minors

The association Link is committed to preventing all forms of abuse against minors and acts in accordance with respect and ensuring the safety of children and adolescents participating in its activities, taking actions to protect the safety of minors.

This document is based on the main instruments produced regarding the protection and safeguarding of minors: the UN Convention on the Rights of the Child and Adolescence, the Council of Europe Convention on the Protection of Children against Sexual Exploitation and Abuse (Lanzarote Convention, 2007).

"Minors" are defined as individuals who have not yet reached the age of eighteen. This document aims to ensure the safeguarding of all minors who come into contact with employees, volunteers, interns, and external collaborators during the association's activities.

Principles, Values, Actions

The association, through its employees, interns, volunteers, and collaborators, commits to respecting the following values and principles:

1. We recognize the value of each individual, not tolerating any form of discrimination based on age, race, skin color, ethnic or social origin, gender, genetic characteristics, language, religion or personal beliefs, political opinions, or any other nature, membership of a national minority, gender identity or sexual orientation, heritage, birth, or disabilities.
2. We recognize every child's right to protection from all forms of violence or abuse. We commit to taking action to prevent such violence against minors and to report any abuses.
3. Among the protective actions promoted by the cooperative, the interests of minors are considered a priority.
4. We support the right of minors to be heard and to share their point of view, promoting such an approach.
5. We commit to providing all necessary support to employees, interns, volunteers, and collaborators working closely with minors.
6. We commit to informing staff, including interns, volunteers, and collaborators, constantly informing staff of the safeguards in place to prevent potential risks of abuse and exploitation of minors.

Code of Conduct for the Protection of Minors

1. Intervene in cases where there are incidents of physical or psychological violence against a minor.
2. Do not negatively impact the harmonic and socio-relational development of the minor, especially by psychologically abusing them.
3. Do not perpetuate negative behaviors that could set an example for the minor.
4. Intervene in cases of sexual abuse of minors, whether they are under the age of 18, regardless of the legal definition of adulthood or the consent mechanisms legally recognized in different countries. Incorrect beliefs regarding a minor's age are not to be considered an acceptable defense.
5. Intervene in cases where there are interpersonal relationships with minors that may be considered exploitation, mistreatment, or abuse.

6. Do not act in ways that may be harmful or risky to the minor.
 7. Do not use offensive or harmful language, providing inappropriate advice.
 8. Avoid inappropriate or sexually provocative behaviors.
 9. Avoid establishing or maintaining interpersonal contacts online (email, chat, social media, etc.) outside approved activities and/or related to project implementation. Communication must always be professional and never harmful to the minor.
 10. Never allow one or more minors with whom you work or have worked to sleep in your domain/residence except in exceptional cases previously authorized by parental or guardian consent and following scrupulously the safety procedures for the protection of the minor.
 11. Never allow a minor with whom you work to sleep in the same room or bed.
 12. Never lend money, goods, or other benefits to a minor outside the parameters and purposes established by project activities or without the knowledge of the parent or guardian.
 13. Do not tolerate or engage in illegal, harmful, or risky behaviors towards minors.
 14. Never discriminate against or treat some minors differently or favor some over others.
- The above list is not exhaustive or exclusive. The basic principle pursued by our cooperative remains to avoid actions or behaviors that may be inappropriate or potentially abusive towards minors.

It is also essential that staff, volunteers, and external collaborators, in case of contact with minors:

1. Be vigilant in identifying situations at risk for minors and be able to adequately report them to the competent authority.
2. Report any suspicion or certainty about potential abuse or mistreatment towards a minor, as established by this Protocol.
3. Organize work and the workplace in such a way as to minimize risks.
4. Always be under control when carrying out activities with minors.
5. Ensure the dissemination and maintenance of a culture of openness that allows staff, volunteers, minors, and caregivers to easily raise and discuss any topic or concern.
6. Ensure to maintain appropriate behaviors towards the minors with whom they work.
7. Make clear the relational dynamics with minors, always protecting them and not acting against them or in a way that negatively influences them.
8. Value the abilities and competencies of minors, helping them understand their rights, acceptable behaviors, unacceptable behaviors, and what to do if a problem arises.
9. Always maintain a high profile professionally and personally.
10. Respect and protect the rights of minors, always treating them fairly, honestly, justly, and with dignity and respect.
11. Encourage minors' participation in all actions aimed at supporting the development of self-protection skills.

Code of Conduct for Minors' Privacy Protection

The code of conduct for the protection of minors' privacy illustrates the procedures to be followed for the collection and processing of minors' personal data in accordance with the main European regulations. For the collection of minors' data and for communication activities related to the association's projects, written consent from their parents or guardians is necessary.

The association commits to:

1. Not share the information provided by the beneficiaries of its activities and services with third parties.
2. Maintain confidentiality through the employees responsible for managing the personal data of the subjects involved in the cooperative's research activities. Declarations are specifically drawn up for each project and cannot be used for further purposes.
3. Ensure that every publication is compliant with guidelines on the protection and safeguarding of minors' rights.
4. The dissemination of information containing minors who have participated in cooperative activities will be authorized only with the written consent of parents or their guardians. The principle applied in this case will follow what is established by Article 3 of the UN Convention on the Rights of the Child and Adolescence. The principle remains valid for both paper and digital publications, as well as for information or images concerning minors with whom the organization has come into contact.
5. The collection of data and/or images of minors may be authorized only if provided for and/or strictly necessary for the implementation of the organization's activities or projects. Such information can only be used for the purposes for which it was provided and for a limited period of time for the duration of the project. It is the responsibility of the organization's employees to obtain permission from the parents or guardians of the minor, as well as the minor's consent, as provided for by current regulations. The images and data acquired will be stored on the organization's internal servers accessible only to staff members with appropriate credentials who have already subscribed to the ethical code and code of conduct. Data saved on internal servers are protected by passwords and secure from external attacks.
6. The association provides specific informed consent forms for parents and minors. For the publication of photos and images, authorization is always necessary and must be provided by parents through a release that remains revocable at any time pursuant to Article 7 of Legislative Decree no. 196/2003. The reference legislation on consent for the privacy of minors is the General Data Protection Regulation, GDPR, approved by the European Union, with specific reference to Italian legislation.

Staff Training

The staff, interns, and volunteers of the cooperative must be supported in developing skills, knowledge, and experiences in child protection appropriate to their role within the organization. Within the first 12 months from the date of employment, workers must participate in online training seminars on the rights of children and adolescents and on measures to prevent abuses against minors. These educational activities will be aimed at personnel working directly or indirectly with minors and will focus on the following topics: legislation on children's rights, techniques for effective communication with children, measures for prevention, identification, documentation, and reporting of sexual abuses against minors, procedures for protecting privacy. Additionally, periodic supervision will be provided to support staff involved in actions with minors, ensuring the psychophysical well-being of workers.

Procedure for the Protection of Minors

It is established that there should be a designated person for the implementation of this Protocol always present in the association. The designated person, supported by the pedagogical manager and the human resources manager, ensures that a mapping of structures and services for the protection of minors in specific locations where the association operates is carried out and disseminated among the workers (information regarding policies, procedures, and practices, contacts, and services). Based on the information provided by the mapping, the designated person drafts and ensures the dissemination of

procedures among the workers for managing the reporting of possible cases of abuse and the subsequent actions to be taken. Violations of the Protocol must all be reported to the designated person, in their capacity as guarantor of the implementation of this document.

The safe recruitment procedure includes the request of a criminal record certificate (specifically concerning sexual offences) for all volunteers, trainees, and employees involved in activities with minors.

The person responsible for child protection and designated reporting authority is Birgit Atzl, legal representative

The documents will be reviewed once a year..

Relationships with Third Parties

The association Link guarantees collaboration and partnership with third parties that can respect and pursue the norms adopted by this Protocol regarding the protection of minors. The association reserves the right to conduct research on plans for the protection of minors and initiatives promoted in this regard by partner organizations. It will not tolerate the dissemination of potentially inappropriate content intended for minors. All agreements between the association and third parties such as partner organizations and third sector entities must include clauses of this Protocol. Consequently, all partners will review this Protocol through the association's official channels and in written agreements. Agreements with parties identified as partners must clearly highlight the agreed procedures for reporting and investigating cases of Protocol violations.

Partners commit to:

1. Respect this Protocol in all its forms and know how to proceed in case of need to report a suspected abuse of children;
2. Respect the Code of Conduct included in this Protocol.

Altamura, September 20, 2025

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