PROTECTION POLICY
OF CHILDHOOD AND ADOLESCENCE

Institutional safeguarding framework applicable to all projects, programmes and activities of the organization

Institutional document of a permanent nature. Compliance is mandatory for all staff, governing bodies, volunteers, external staff and partner entities.

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INNETICA EUROPEAN NETWORK

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1. Introduction and Statement of Commitment

1.1. Purpose of the document

This Child and Adolescent Protection Policy (hereinafter referred to as "the Policy") sets out the principles, standards of conduct, procedures and responsibilities that INNETICA European Network (hereinafter referred to as "the Organisation") applies to **prevent, detect, report and respond** to any form of violence, abuse, exploitation, neglect or negligent treatment that may affect a minor in the course of its activities.

The Policy has **an institutional, general and permanent character**. It is not developed for a specific project or for a specific call: it constitutes the organization's single framework and applies to all its programmes, projects, activities and contractual relationships, regardless of the source of funding and the country of implementation.

This document responds, among others, to the requirements of the European Commission in terms of the protection and safety of the participants, as well as to the obligations arising from Spanish and international legislation set out in section 2.

1.2. Declaration of commitment

INNETICA European Network assumes that the protection of children and adolescents is an **ethical and legal obligation that does not admit exceptions, nuances or considerations of opportunity**. Accordingly, the organization formally declares that:

- It maintains a position of **zero tolerance** towards any form of violence, abuse or exploitation of minors, both inside and outside the organisation.
- It places the **best interests of the minor** above any other consideration, including those of an economic, contractual, institutional or reputational nature.
- It acknowledges that **the absence of minors among the direct recipients of a project does not exempt from compliance with this Policy**, given that contact with minors may occur

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indirectly, incidentally or occasionally: events open to the public, multiplier activities, digital environments and learning platforms, dissemination materials, institutional visits, accompanying persons or participants who have not accredited their age.

- It assumes that protection is a **shared responsibility** and enforceable to all persons linked to the organization, regardless of their position, seniority or relationship regime.
- It undertakes to provide the **human, training and financial resources** necessary for the effective application of this Policy and to review it periodically.

1.3. Scope

1.3.1. Subjective scope

The Policy binds to:

- Hired **personnel**, regardless of their contractual modality, dedication or duration.
- Members **of governing bodies** and any advisory bodies.
- **Volunteers, trainees or interns**.
- External **staff**: consultants, trainers, research staff, evaluators, translators, photographers, supplier companies and their subcontractors.
- **Partner organisations and collaborating entities**, when they are involved in activities promoted or co-organised by the organisation, under the terms of section 5.8.
- Visitors: journalists, institutional representatives, funders and observers who access activities in which minors participate.

1.3.2. Objective scope

The Policy applies to all the organisation's activities, whether **face-to-face, hybrid or online**, carried out in Spain or abroad, including, but not limited to: transnational project meetings, training and learning activities, multiplier and dissemination events, mobilities, piloting and

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validations, data collection and fieldwork, production of training and communication materials, management of learning platforms and institutional social networks.

1.3.3. Temporal scope

The Policy is enforceable during the development of the professional or voluntary activity and also outside it when the conduct is related to the organization, to the people participating in its activities or may compromise the trust placed in the entity.

1.4. Binding nature

The reading, acceptance and signing of this Policy and its Code of Conduct (Annex I) are a **prerequisite and essential condition** for the incorporation of any person into the organisation or its projects, as well as for the formalisation of agreements with partner entities and suppliers.

Failure to comply with this will be considered a serious or very serious offence and will lead to the initiation of the procedure provided for in section 7.5, without prejudice to any administrative, civil or criminal liabilities that may arise.

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2. Regulatory and reference framework

This Policy is based on the legal instruments and technical standards listed below, compliance with which is mandatory in all applicable matters.

2.1. International framework

- **United Nations Convention on the Rights of the Child** (New York, 20 November 1989), in particular articles 3 (best interests), 12 (right to be heard), 19 (protection from all forms of violence), 34 (sexual exploitation) and 39 (recovery and reintegration).
- **General Comment No. 13 (2011)** of the Committee on the Rights of the Child on the right of the child to be free from any form of violence, and **General Comment No. 14 (2013**) on the best interests of the child as a primary consideration.
- **Optional Protocol** to the Convention on the sale of children, child prostitution and child pornography (2000).
- **Universal Declaration of Human Rights** and **Sustainable Development Goal 16.2** (end abuse, exploitation, trafficking and all forms of violence against children).

2.2. Council of Europe

- **Convention for the Protection of Children from Sexual Exploitation and Sexual Abuse** (Lanzarote Convention, 2007).
- **Convention on preventing and combating violence against women and domestic violence** (Istanbul Convention, 2011), with special attention to its articles 26 (protection and support of child witnesses) and 31 (custody, visitation rights and security).
- **Convention on Action against Trafficking in Human Beings** (Warsaw, 2005) and **Council of Europe Strategy for the Rights of the Child**.

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2.3. European Union

- **Charter of Fundamental Rights of the European Union**, Article 24 (rights of the child) and Article 8 (protection of personal data).
- **Directive 2011/93/EU** of the European Parliament and of the Council on combating the sexual abuse and sexual exploitation of children and child pornography.
- **Directive 2012/29/EU** on minimum standards on the rights, support and protection of victims of crime.
- **Regulation (EU) 2016/679** (General Data Protection Regulation, GDPR).
- **EU Strategy on the Rights of the Child** and **European Child Guarantee**.
- **Guide to the Erasmus+ Programme** and other regulations of the calls in which the organisation participates, in relation to the protection, safety and safeguarding of the participants.

2.4. National framework (Spain)

- **Spanish Constitution**, Article 39 (social, economic and legal protection of the family and children).
- **Organic Law 1/1996 of 15 January 1996** on the Legal Protection of Minors.
- **Organic Law 8/2021, of 4 June**, on the comprehensive protection of children and adolescents against violence (LOPIVI), with particular reference to the duty of communication, the figure **of the Protection Delegate** and the requirement of accreditation by means of a negative certificate from the Central Register of Sex Offenders and Human Trafficking for access to professions and activities that involve regular contact with minors.
- **Law 45/2015, of 14 October**, on Volunteering, regarding the requirements for volunteers who intervene with minors.

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- **Organic Law 10/1995 of 23 November 1995** on the Penal Code, in particular Titles VII bis and VIII.
- **Criminal Procedure Act**, Articles 259 and 262, relating to the duty to report known offences.
- **Organic Law 3/2018, of 5 December**, on the Protection of Personal Data and guarantee of digital rights, and **Law 4/2015, of 27 April**, on the Statute of the Victim of Crime.
- The regional regulations on child protection that are applicable by reason of the territory in which the activity is carried out.

When the activities take place outside Spain, the organization will apply this Policy and, in addition, the legislation of the host country. In the event of a discrepancy, the rule that offers the greatest protection to the minor shall always prevail.

2.5. Technical reference standards

- **International Child Safeguarding Standards**, of the Keeping Children Safe network.
- **Core Humanitarian Standard on Quality and Accountability** (CHS), in terms of accountability and complaint mechanisms.
- **Bulletin of the United Nations Secretary-General** on Special Measures for Protection from Sexual Exploitation and Sexual Abuse (ST/SGB/2003/13), as a reference in the field of prevention (PEAS).

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3. Definitions

For the purposes of this Policy, the following terms shall be construed as defined below.

Term	Definition
Underage	Any person under eighteen (18) years of age, in accordance with Article 1 of the Convention on the Rights of the Child, regardless of whether local law establishes an age of majority or a lower age of consent.
Child protection	A set of measures aimed at preventing and responding to violence, abuse, exploitation and neglect of minors.
Safeguarding	The organization's responsibility to ensure that its personnel, operations, and programs do not cause harm to or expose children to risk, and to report any concerns regarding their safety to the appropriate authorities.
Violence	Any form of physical or mental harm or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse, in accordance with article 19 of the Convention on the Rights of the Child.
Physical abuse	Non-accidental action that causes physical harm or illness, or that places the minor at serious risk of suffering them: blows, shakes, burns, poisoning, suffocation or immersion, among others. It includes the simulation or deliberate provocation of symptoms by the caregiver.
Emotional or psychological abuse	Persistent verbal or gestural hostility, contempt, humiliation, isolation, threat, or rejection that impairs emotional development. It includes repeated exposure to situations of violence in the family environment.
Sexual abuse	Any conduct consisting of forcing or inducing a minor to participate in activities of a sexual nature, whether or not they understand what is happening, with or without physical contact. It includes the exhibition,

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Term	Definition
	production or dissemination of child sexual abuse material. It is never possible to presume valid consent of a minor person in front of an adult or person of greater authority, age or knowledge.
Sexual exploitation	Abuse or attempted abuse of a situation of vulnerability, a relationship of power or trust for sexual purposes, including obtaining economic, social or political benefit. It includes the use of minors in sexual activities in exchange for money, goods, accommodation, protection or any other consideration.
Labour exploitation and other forms of exploitation	Use of a minor for the benefit of others and to the detriment of his or her physical or mental health, education or moral and socio-emotional development, including child labour and begging.
Neglect or neglect	Persistent failure to comply with the obligation to attend to basic physical, health, educational or emotional needs, resulting in serious harm or risk to development.
Peer violence and harassment	Intentionally harmful conduct, usually repeated, exercised by one or more minors on another in a disadvantaged situation: physical, verbal, relational, sexual or discriminatory.
Digital violence	Cyberbullying, online sexual deception (grooming), non-consensual dissemination of intimate images, sextortion and exposure to harmful or illicit content.
Direct contact	Physical presence or synchronous interaction – face-to-face or telematic – with minors within the framework of the organisation's activities, on a one-off or regular basis.

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Term	Definition
Indirect contact	Access to identifying information of minors (names, addresses, educational centers, images, life histories or contact details) without personal interaction.
Safeguard incident	Any fact, suspicion, disclosure, or allegation that indicates harm or risk of harm to a minor, or a violation of this Policy or its Code of Conduct.
Protection Delegate	A person designated by the organization as responsible for the implementation of this Policy and as the focal point for the receipt and management of incident communications.
Reporting person	Any person who reports a safeguarding incident in good faith, whether or not they are a member of the organization.

4. Guiding principles

Any decision, action or procedure arising from this Policy shall be interpreted and applied in accordance with the following principles:

1. **Best interests of the minor.** It is the overriding consideration and overrides any other competing legitimate interests, including those of the organization itself.
2. **Zero tolerance.** No form of violence, abuse or exploitation is permissible, justifiable or excusable for reasons of culture, context, tradition or intention.
3. **Non-discrimination and inclusion.** The Policy provides equal protection to all minors, without distinction as to national, ethnic or social origin, sex, gender identity, sexual orientation, language, religion, opinion, disability, administrative status or economic status. Reinforced attention will be paid to those who are in a situation of special vulnerability.

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4. **Participation and the right to be heard.** Minors have the right to express their views and to have their views duly taken into account in the light of their age and maturity, including information on how and to whom they can report a concern.
5. **Shared and proactive responsibility.** Protection is not delegated: it is the responsibility of all persons linked to the organization. When in doubt, it is necessary to communicate.
6. **Confidentiality and data protection.** Information relating to an incident will be processed in accordance with the need-to-know principle and data protection regulations, and this may never be invoked to omit mandatory reporting.
7. **No revictimization.** The procedures are designed and implemented in such a way as to avoid any unnecessary exposure, the repetition of stories and any adverse consequences for the minor.
8. **Transparency and accountability.** The organisation documents its actions, informs the authorities and funders when it is mandatory and submits the Policy to continuous evaluation and improvement.

5. Prevention measures

5.1. Secure selection and hiring

The organization applies a selection procedure aimed at preventing access to its activities by persons who pose a risk to children. Mandatory:

- **Job offers and descriptions** , including those for volunteering and internships, expressly mention the entity's commitment to safeguarding and the responsibilities of the position in this area.
- Screening **interviews** include at least one specific question about previous experience with minors and about the candidate's understanding of safeguarding.

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- Two professional references **are requested and verified** from people who have known the candidate for a minimum of two years, excluding family members.
- Any person who is going to maintain **direct contact with minors** provides, prior to the commencement of their activity, **a negative certificate from the Central Register of Sex Offenders and Trafficking in Human Beings** or an equivalent document issued by the competent authority of their country of origin or residence. The certification is renewed every three years or when required by applicable regulations.
- Every person signs the **declaration of responsibility** in Annex II and the **Code of Conduct** in Annex I.
- The supporting documentation is kept in the personal file, with restricted access and in accordance with data protection regulations.

Background checks are a necessary but not sufficient measure: most abusive behaviors are not recorded at all. That is why it is always combined with references, training, supervision and safe design of activities.

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5.2. Training and awareness-raising

- **Initial welcome:** any person who joins receives, within a maximum period of thirty (30) calendar days, an information session on this Policy, the Code of Conduct and the notification procedure.
- **Compulsory basic training:** aimed at all staff, governing bodies, volunteers and trainees. It includes the identification of indicators of lack of protection, the response to a disclosure, the communication procedure and the processing of data.
- **Reinforced specific training:** for those who perform functions with direct contact or access to identification data of minors.
- **Recycling:** at least every two years, and provided that the applicable regulations or the Policy itself are modified.
- **Register:** the Protection Delegate maintains a documentary record of the training actions, their content and assistance, available for verification by funders and auditors.

5.3. Code of Conduct

The Code of Conduct that appears as Annex I is an inseparable part of this Policy and develops the required and expressly prohibited conducts. Their signature is mandatory and is kept in the file of each person or entity.

5.4. Safe design of activities and risk assessment

Prior to any activity in which the participation – direct or indirect – of minors is expected, the responsible coordination completes the **risk assessment** in Annex V, which is validated by the Protection Delegate and is kept together with the documentation of the activity. The evaluation includes, at least:

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- **Presence of two adults:** no activity with minors is carried out with a single responsible adult. The "two-adult rule" shall apply whenever materially possible.
- **Visibility:** interactions occur in open, visible spaces or with unclosed doors. Any unjustified isolation situation is avoided.
- **Supervision ratios** appropriate to age, number of participants and the nature of the activity, documented in the evaluation.
- **Access control and registration** of participants, companions and staff.
- **Informed consent** of the parents or legal representatives (Annex VI), including authorisation for urgent health care.
- **Emergency and evacuation plan**, with identification of the nearest health and emergency services.
- **Valid** civil liability and accident insurance coverage for the activity.
- **Travel and accommodation:** no adult will share a room with a minor who is not a family member; individual travel is avoided and, when unavoidable, is authorised in writing and communicated in advance.

5.5. Digital environments and online security

Online activities and learning platforms managed by the organisation are subject to the following rules:

- All communication with minors is carried out through **institutional channels and accounts**, never from accounts, devices or personal profiles, and with the knowledge of the parents or legal representatives.
- Online sessions involving minors feature **two adults** connected and avoid private rooms or individual direct messages.

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- **Session recording** requires prior information and express consent; files are stored in institutional repositories with restricted access.
- Learning platforms apply **individualized access control**, forum moderation, and disabling unnecessary features.
- Accessible mechanisms are established to **communicate inappropriate content or behaviour** in the digital environment itself.
- Materials and activities incorporate, where appropriate, **digital literacy and online safety** content for participants.

5.6. Communication, images and media

- **Dignity:** minors are always represented in a respectful way, dressed appropriately and never in positions that could be interpreted as sexualized, or as passive or helpless victims.
- **Veracity:** images and stories are not manipulated, decontextualized or sensationalized.
- **Privacy:** only the **first name** is used – or a pseudonym when security advises it – and no data is disseminated that allows the location: address, educational centre, host entity or geotagging of images.
- **Double consent:** any capture or dissemination of an image, voice or testimony requires the informed and written consent of the minor **and** of the person who holds his or her legal representation (Annex VI), which may be revoked at any time.
- **Preference for general** and group shots focused on the activity over individual close-ups.
- **Third parties:** journalists, photographers and film crews receive prior instruction on this Policy, sign Annex I and remain accompanied by staff of the organization at all times.
- **Custody:** graphic archives are kept in institutional repositories with restricted access, with deletion at the end of the planned conservation period.

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5.7. Protection of personal data

The processing of data of minors is governed by the GDPR and Organic Law 3/2018, in accordance with the following rules:

- Prior identification of the **legal basis** of the processing and the purpose, which is communicated in a clear and age-appropriate manner.
- **Minimization:** only strictly necessary data is collected; data relating to health, origin or family situation only when essential for the safety of the person.
- **Restricted access** according to the need-to-know principle, with technical security measures (access control, encryption and backup copies).
- **Defined retention** periods, with subsequent deletion or anonymisation; safeguarding incident files are retained for the legally required period.
- **Security breaches:** notification to the competent supervisory authority within seventy-two (72) hours and to the affected persons where appropriate.
- In Spain, the **consent of the minor himself** is only valid from the age of fourteen (14); below that age the consent of the legal representative is required.

5.8. Partners, collaborators and suppliers

- Before entering into an agreement, the organisation **verifies** whether the partner has a child protection policy equivalent to or greater than this one.
- Where it does not have one, the partner entity **formally adheres to this Policy** and undertakes to develop its own Policy in accordance with its national legal framework.
- Agreements, grants, and contracts incorporate a **safeguard clause** that obliges you to: (i) comply with this Policy; (ii) background checks on its personnel with contact with minors to the extent permitted by law; (iii) notify the organization of any incident within a

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maximum period of **twenty-four (24) hours**; and (iv) transfer identical obligations to its subcontractors.

- Repeated non-compliance or failure to report incidents may lead to the **suspension of collaboration** and, where appropriate, to the termination of the agreement, without prejudice to the appropriate legal actions.

6. Detection: indicators and duty of vigilance

Any person linked to the organization maintains an attitude of active vigilance with respect to indicators that may suggest a situation of lack of protection. These indicators, which are listed in **Annex IV,** are indicative: their presence does not allow us to conclude the existence of violence, just as their absence does not rule it out.

It is not the responsibility of the organization's personnel to diagnose, verify or investigate. Their obligation is to observe, record objectively and communicate without delay. When in doubt, it is always appropriate to communicate.

Indicators relating to the behaviour of adults **deserve equal attention**: attempts to establish privileged or exclusive relationships with a minor, unauthorised private contact, giving gifts, requests for secrecy, repeated breaches of the Code of Conduct or deliberate search for situations of isolation.

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7. Notification and response procedure

7.1. Duty to communicate

Any person included in the scope of this Policy has the **inexcusable duty to report** any safeguarding incident of which they are aware, suspected or indigenous, regardless of who the person allegedly responsible is – their own staff, staff of a partner entity, another minor, a family member or a third party – and where the event occurred.

This duty is **personal and cannot be delegated**. The omission of communication constitutes in itself a breach of this Policy and may also entail liability in accordance with articles 259 and 262 of the Criminal Procedure Law and Organic Law 8/2021.

7.2. Communication channels

Location	Channel
Ordinary route	Child Protection Delegate (contact details in section 8.5), orally or in writing, using the form in Annex III.
If the communication affects the Protection Officer	Presidency of the organization.
If it affects the Presidency or the governing body	Directly to the competent authorities (Public Prosecutor's Office, National Police or Civil Guard) and to the social protection services of the autonomous community.
Imminent risk to life or integrity	Single emergency telephone number 112, with immediate and subsequent communication to the Protection Delegate.
Public childcare channels	European Child Helpline 116 111 · ANAR Telephone 900 20 20 10 · Child and adolescent helpline 116 111.

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The communication may be made in writing or orally and, in the latter case, it must be formalised using the form in Annex III within a maximum period of **twenty-four (24) hours**.

7.3. Immediate action

1. **Ensure safety.** Take the necessary measures without delay to put an end to the risk and, if necessary, seek medical assistance or call 112.
2. **Listen without questioning.** If the minor makes a disclosure, listen calmly, without direct or evaluative questions, without promising secrecy and without expressing any judgment.
3. **Do not investigate on your own.** The investigation of the facts corresponds to the competent authority. An unqualified inquiry compromises the evidence and exposes the minor to revictimization.
4. **Record objectively.** Record in writing, as soon as possible, what has been observed or stated, clearly distinguishing facts from opinions and using as far as possible the verbatim words of the minor.
5. **Notify the Protection Delegate on the same day**, and formalise the communication in writing within 24 hours.
6. **Preserve the evidence** that exists (messages, emails, screenshots, documents), without altering or disseminating them.

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In the face of a revelation, it DOES proceed	In the face of a revelation, it is NOT appropriate
Remain calm and convey security.	Expressing surprise, alarm or reproach.
Listen without interrupting and with mindfulness.	Interrupt, complete sentences, or suggest answers.
Use open and neutral questions if they are essential.	Asking directed, leading or repetitive questions.
To be grateful for the trust and to recognize the difficulty of the story.	Promise that we will not tell anyone.
Explain honestly and in an understandable way what will be done next.	Confront or contact the person allegedly responsible.
Register in writing immediately and communicate.	Disseminate, comment or consult the case with people outside the procedure.

7.4. Communication to the competent authorities

The Protection Delegate assesses the communication received and, when the facts could constitute a criminal offence or reveal a situation of lack of protection, he or she informs the competent authority **without delay and, in any case, within twenty-four (24) hours of** receipt. The competent authorities, as the case may be, are:

- The **112 telephone** number and the emergency services, in the event of imminent risk.
- The **National Police** (Family and Women's Unit, UFAM) or the **Civil Guard** (EMUME).
- The **Juvenile Prosecutor's Office** or the corresponding Provincial Prosecutor's Office.
- The **social services and the public entity for the protection of minors** of the Autonomous Community in which the minor resides.

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- In activities carried out **outside Spain**, the competent local authorities and, where appropriate, the Spanish consular representation, informing the host partner entity in parallel.

Communication to the authorities **is not conditional on** the outcome of any internal verification, nor on the agreement of the person concerned, nor on the existence of conclusive evidence. The existence of rational indications is sufficient.

7.5. Internal action and disciplinary regime

- **Precautionary measure:** when the communication affects a person linked to the organisation, he or she will be immediately removed from any activity that involves contact with minors, while the procedure is being carried out. This measure is **precautionary and not punitive** in nature and does not prejudge any liability.
- **Investigation:** the Protection Delegate instructs the internal file or proposes the appointment of an external investigator when complexity or impartiality so advises. The procedure is resolved within **fifteen (15) working days**, which may be extended in a reasoned manner.
- **Guarantees:** presumption of innocence, hearing of the person concerned, reasons for the decision and written notification.
- **Appeal:** the interested party may appeal to the governing body within **seven (7) calendar days** of notification. The resolution of the appeal exhausts the domestic remedies.
- **Measures:** depending on the seriousness, they may be adopted from a written warning, additional mandatory training or change of functions, to the termination of the employment, voluntary or contractual relationship, with a notation of non-reinstatement in the file.
- **Concurrence:** the internal procedure is suspended and is subordinated in any case to judicial or police action, to which the organization lends full cooperation.

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7.6. Support for minors

- The necessary measures are taken immediately to avoid any new contact with the source of the risk.
- Accompaniment is provided and, where appropriate, referral to specialized health, psychological, social or legal services is facilitated.
- Parents or legal representatives are informed, **except when there are indications that they may be the source of the risk**, in which case action is taken exclusively through the competent authorities.
- Any unnecessary repetition of the story and any public exposure, including internal communications of the project, are avoided.

7.7. Confidentiality, indemnity and bad faith communications

- The information is shared only with those who need to know it to protect the minor or to comply with a legal obligation.
- Any **retaliation** against anyone who communicates an incident in good faith or collaborates in its clarification is prohibited. Any act of retaliation is in itself a very serious violation of this Policy.
- Anyone who communicates in good faith is protected regardless of whether the communication is ultimately unfounded.
- The deliberate formulation of **false or bad faith** communications constitutes a serious infraction and will lead to the appropriate disciplinary measures.

7.8. Registration and documentation

The Protection Delegate keeps a **confidential record of incidents** in which the date, nature of the event, the actions taken, the communications made to third parties and the final result are

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recorded. The register is kept with restricted access, is kept in accordance with the applicable regulations and serves as the basis for the anonymised annual report provided for in section 9.2.

8. Governance: roles and responsibilities

8.1. Governing body and Presidency

- Approve the Policy and its revisions, and ensure its effective application.
- To appoint the Protection Delegate and guarantee their functional independence and direct access to the Presidency.
- To allocate the necessary human, training and economic resources.
- To be aware of the annual safeguarding report and to adopt the decisions derived from it.
- To resolve the appeals provided for in section 7.5.

8.2. Child Protection Delegate

He is the organisation's reference figure in terms of safeguarding. It is responsible for:

- Promote awareness and application of the Policy throughout the organization and among its partner entities.
- To receive, register and process incident reports and decide to transfer them to the competent authorities.
- Advise and accompany staff in the event of any doubts or concerns regarding protection.
- Validate risk assessments of activities and verify secure hiring documentation.
- Design and coordinate the training plan and maintain its registration.
- To safeguard the confidential record of incidents and prepare the annual report.
- To propose to the governing body the modifications to the Policy that are necessary.

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The contact details of the Protection Delegate are published at the organisation's headquarters, on its website and in the documentation of each project, and are communicated to the participants and their families at the beginning of each activity.

8.3. Coordination of projects and activities

- Complete the risk assessment before the start of each activity and apply the resulting measures.
- Verify that all personnel involved have signed the Code of Conduct and, where applicable, accredited the background.
- Inform participants and their families about the existence of this Policy and about the communication channel.
- Collect and safeguard informed consents.
- To report any incident to the Protection Delegate without delay.

8.4. All persons included in the scope of the Policy

- Know, accept and comply with the Policy and Code of Conduct.
- Immediately report any suspicion, disclosure or non-compliance.
- Participate in mandatory training actions.
- To collaborate with the internal actions and with the investigations of the authorities.
- Refrain from any conduct that may compromise the safety or dignity of a minor.

8.5. Contact details

Child Protection Officer	Mr. Arturo J. González Ascaso

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Phone	(+34) 677 259 117
Email	ajgonzalez@innetica.org
Presidency	Ms. Cristina Díaz Dobarro
Phone	(+34) 662 464 530
Email	cdiazdobarro@gmail.com
Emergencies	112 · European Child Helpline: 116 111 · ANAR Foundation: 900 20 20 10

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9. Monitoring, evaluation and review

9.1. Self-assessment

On an annual basis, the organisation carries out a self-assessment of its safeguarding system based on the *International Child Safeguarding Standards* of Keeping Children Safe. The self-assessment identifies existing gaps and results in an improvement plan with actions, responsibilities and deadlines.

9.2. Indicators and annual report

The Protection Delegate submits an annual report to the governing body that includes, at least, the following indicators:

Indicator	Reference value
Percentage of staff, volunteers, and governing bodies with current safeguarding training	100 %
Percentage of people with direct contact who can prove current background certification	100 %
Percentage of activities with previously validated risk assessment	100 %
Percentage of partners with their own policy or accredited formal membership	100 %
Number of reported incidents and average response time	24-hour response ≤
Number of improvement actions executed over those planned	≥ 90%

The report is presented in aggregated and anonymized format, without any data that would allow the identification of the people affected.

9.3. Revision

- **Ordinary review:** on an annual basis.

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- **Extraordinary review:** when the applicable regulations are modified, when a serious incident occurs, when required by a funder or when the monitoring shows deficiencies.
- Any modification is approved by the governing body, communicated to all staff and partners, and results in a new signature of Annex I when it affects the Code of Conduct.

9.4. Learning after an incident

Once any incident is concluded, an internal review is carried out to determine which organisational failures made it possible and what preventive measures should be reinforced. Their findings are incorporated into the improvement plan.

10. Dissemination, approval and entry into force

- The Policy is published on the organization's website and in the digital spaces of the projects, and is made available to anyone who requests it.
- It is disseminated to all staff, volunteers, governing bodies, partner entities and suppliers.
- An accessible language version is **being prepared and disseminated** for children and adolescents (Annex VII).
- The Policy enters into force on the date of its approval by the governing body and remains in force until its express modification or repeal.

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Approved by the governing body	Child Protection Officer
73014512T CRISTINA DIAZ (R: G99252512) Firmado digitalmente por 73014512T CRISTINA DIAZ (R: G99252512) Fecha: 2026.10.18 11:58:22 +02'00'	GONZALEZ ASCASO ARTURO JOSE - 17725511D Firmado digitalmente por GONZALEZ ASCASO ARTURO JOSE - 17725511D Fecha: 2026.10.18 11:58:46 +02'00'
Signed: Mrs. Cristina Díaz Dobarro	Signed: Mr. Arturo J. González Ascaso
President	Protection Officer
In Navas del Rey, on July 20th, 2026	In Zaragoza, July 21st, 2026

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Annex I. Code of Conduct and Declaration of Commitment

This Code develops the standards of behaviour required of any person within the scope of the Policy. Its interpretation will be carried out in accordance with the principle of the best interests of the minor and in accordance with criteria of transparency and common sense.

A. Enforceable conduct

- Treat all minors with respect, dignity and kindness, valuing their opinions and decision-making capacity in accordance with their age and maturity.
- Always act in visible spaces and, whenever possible, in the presence of another adult.
- Listen to minors and pay attention to any signs of discomfort, fear or withdrawal.
- Use positive, inclusive and non-discriminatory language, and constitute a role model in treatment, language and personal presentation.
- Maintain clear professional boundaries at all times.
- Obtain the consent of the minor and his or her legal representative before any individual interaction, and maintain such meetings in conditions of transparency.
- Promptly report any suspicion, disclosure or non-compliance in accordance with established procedure.
- Meet background check requirements and participate in mandatory training.
- To preserve the confidentiality of all information relating to minors.
- Consult the Protection Delegate if you have any questions.

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B. Expressly prohibited conduct

- Maintaining any form of contact or relationship of a sexual nature with a minor, regardless of the age of consent set by local legislation, as well as any conduct that may be interpreted as preparatory to such a relationship.
- Exercising physical violence, corporal punishment, humiliation, threat, isolation or any form of degrading or discriminatory treatment.
- To remain alone with a minor out of sight of third parties, unless justified need, with prior authorization and communication.
- Staying in the same room or sharing a bed with a minor who is not a relative.
- Transporting a minor in a private vehicle without written authorization and without the accompaniment of another adult.
- Establish private contact by phone, messaging or social networks through personal accounts, or request the maintenance of secrets.
- Giving money or gifts individually, or accepting them from minors or their families.
- Capture, store or disseminate images, videos or personal data without the required double consent. It is absolutely forbidden to access, possess or distribute child sexual abuse material.
- Using sexual, obscene, degrading or discriminatory language in the presence of minors.
- Consuming alcohol or narcotic substances, or being under the influence of them, during the exercise of functions with minors, as well as facilitating them.
- Performing tasks for the minor that he or she can perform on his or her own, especially those related to grooming or dressing.
- Ignore, minimize, or cover up a disclosure, suspicion, or violation of this Code, or dissuade another person from reporting it.
- To exercise any form of retaliation against anyone who communicates in good faith.

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C. Declaration of commitment

D./Mrs. ....., with identity document No. ....., in her capacity as ..... in INNETICA European Network, **states**:

- That they have read and understood the Policy for the Protection of Children and Adolescents and this Code of Conduct.
- That it accepts and undertakes to fully comply with its principles, rules and procedures.
- That it assumes the duty to immediately report any suspicion or knowledge of a safeguarding incident.
- That it is aware that failure to comply with this Code may lead to disciplinary measures, the termination of its relationship with the organization and, where appropriate, criminal liability.

Date: ..... Signature:

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Annex II. Responsible declaration and background check

To be completed by any person who is going to maintain direct or indirect contact with minors within the framework of the organization's activities.

Name and surname:

Identity document no.:

Position, function or relationship:

Expected Joining Date:

Statement

The undersigned person **declares under his or her responsibility**:

9. That she has not been convicted by a final judgment for any crime against sexual freedom and indemnity, trafficking in human beings or exploitation of minors.
10. That she is not involved in any criminal or disciplinary proceedings for acts of this nature.
11. That it undertakes to immediately notify the organization of any supervening circumstance that alters what has been declared.
12. Which authorizes the organization to verify the information provided and to request the legally required certifications.

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Documentation provided

Document	Contributed	Date
Negative certification from the Central Register of Sex Offenders and Human Trafficking (or equivalent from the country of origin/residence)	Yes ☐ No ☐	
Professional reference 1 (name, entity and contact)	Yes ☐ No ☐	
Professional reference 2 (name, entity and contact)	Yes ☐ No ☐	
Signed Code of Conduct (Annex I)	Yes ☐ No ☐	
Safeguarding Training Accreditation	Yes ☐ No ☐	

Date: ..... Signature of the declarant:

Verified by (Protection Delegate): Date:

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Annex III. Incident Report Form

This form is **sent exclusively** to the Child Protection Delegate, who will guard it with restricted access. It is completed as accurately as possible, always distinguishing **facts** from **personal impressions**. Its presentation is not a substitute for immediate verbal communication.

1. Data of the reporting person

Name and surname:

Position or relationship with the organization:

Phone and email:

Relationship or type of contact with the minor:

2. Data of the minor

Name (or initials, if unknown):

Approximate age/date of birth: Gender:

Parent(s) or legal representative(s) and contact, if known:

Centre, entity or activity in which you participate:

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3. Description of the incident

Source of information: ☐ Directly ☐ observed Suspicion based on evidence ☐ Disclosureof the minor ☐ himself Communicationof a third party

Date of Incident: Time: Place:

Description of the facts (what, when, where, who was present):

Verbatim words of the minor, if any, and answer given:

Person(s) allegedly responsible, if known:

Other persons present or witnesses:

Are there other minors at risk? Yes ☐ No ☐ Detail:

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4. Actions already carried out

Measures taken to ensure safety:

Has health care been provided? Yes ☐ No ☐ Detail:

Have you contacted any authority? Yes ☐ No ☐ What, whenand with whom?

Date and time of completion: Signature:

5. Space reserved for the Protection Delegate

Date and time received: Registration number:

Initial assessment and decision adopted:

Communication to authorities: Yes ☐ No ☐ Authority, date and time:

Precautionary measures adopted:

Support provided to minors:

Follow-up and closure:

Signature of the Protection Delegate: Date:

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Annex IV. Indicators of possible lack of protection

Indicative and non-exhaustive list. The presence of one or more indicators does not allow us to conclude the existence of violence; Her absence does not rule her out either. If in doubt, it is necessary to inform the Protection Delegate.

Possible physical abuse	Possible neglect or neglect
Bruises, burns, bites, fractures, or injuries with no coherent explanation. Improbable, changing explanations or refusal to talk about the injuries. Rejection of physical contact or startle at sudden movements. Use of clothing inappropriate to the season to cover the body. Refusal to participate in activities that involve changing clothes. Fear of returning home or of being notified of the family. Behaviors of extreme aggressiveness or excessive passivity and submission.	Frequent hunger or hoarding of food. Clearly deficient personal hygiene. Persistent tiredness or drowsiness. Clothing inappropriate to weather conditions. Repeated absenteeism or unpunctuality. Unattended health problems. Prolonged lack of adult supervision.

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Possible emotional abuse	Possible sexual abuse or exploitation
Delayed physical, cognitive, or emotional development. High anxiety, fear of new situations. Low self-esteem and persistent self-worth. Disproportionate emotional responses. Sudden onset language disturbances. Extreme passivity or aggressiveness. Repeated escapes or risky behaviors.	Sexualized knowledge or behavior inappropriate for age. Sudden onset enuresis or encopresis. Discomfort or injuries in the genital or anal area. Sleep disorders, recurring nightmares. Fear or rejection of a specific adult. Sudden changes in performance or behavior. Possession of money, gifts, or devices without explanation. Extreme risk behaviors in adolescence.

Indicators related to adult behaviour
Deliberate search for situations of isolation or private contact with a specific minor.
Establishment of exclusive or "special" relationships, delivery of gifts or unique attention.
Contact through personal channels or outside the hours and framework of the activity.
Requests for secrecy or concealment from the family or the team.
Repeated breaches of the Code of Conduct or resistance to supervisory measures.
Significant change in the behavior of a minor in the presence of a specific adult.

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Annex V. Risk assessment of the activity

Name of the activity:

Project or program: Date(s):

Place and modality (face-to-face / online / hybrid):

Expected number of minors and age group:

Person responsible for the activity:

Identified risk	Preventive measures	Residual risk	Responsible
Unsupervised contact between an adult and a minor	Two-person adult rule; visible spaces; Unlocked doors	Low ☐ Medium ☐ High ☐	
Staff without background checks	Prior check; Prohibition of access without accreditation	Low ☐ Medium ☐ High ☐	
Improper capture or dissemination of images	Dual consent; prohibition of personal devices; Institutional custody	Low ☐ Medium ☐ High ☐	

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Identified risk	Preventive measures	Residual risk	Responsible
Risks of the digital environment	Institutional accounts; moderation; Two adults connected	Low ☐ Medium ☐ High ☐	
Violence between peers	Supervision; rules of coexistence; Accessible communication channel	Low ☐ Medium ☐ High ☐	
Accident, health emergency or evacuation	Emergency plan; first aid kit; current insurance; Emergency contacts	Low ☐ Medium ☐ High ☐	
Travel and accommodation	Written authorization; prohibition of shared rooms; Control Listing	Low ☐ Medium ☐ High ☐	
Processing of personal data	Minimization; restricted access; Deletion deadlines	Low ☐ Medium ☐ High ☐	
Other (specify)		Low ☐ Medium ☐ High ☐	

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Prepared by: Date:

Validated by the Protection Delegate: Date:

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Annex VI. Informed consent

A. Participation in the activity

D./Mrs. ....., with identity document No. ....., in their capacity as parent or legal representative of ....., of ..... years of age, **authorizes** his/her participation in the activity ....., organized by INNETICA European Network, and **declares** that he/she has been informed of:

- The purpose, content, place and dates of the activity.
- The **voluntary** nature of participation and the right to withdraw at any time without any consequences.
- The existence of a Child Protection Policy and a channel for reporting incidents, whose contact details have been provided to you.
- The processing of personal data, in accordance with the GDPR.

Relevant health information (allergies, medication, support needs, dietary requirements):

Contact telephone number during the activity:

It also **authorises** that, in the event of an emergency and impossibility of contact, the minor is provided with the health care that is necessary by medical personnel: **Yes** ☐ **No** ☐

Date: ..... Signature of the parent or legal representative:

B. Image, Voice, and Testimony

Check an option in each section. Refusal **does not prevent** participation in the activity.

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Authorization requested	Reply
Capture images, video or audio during the activity	Yes ☐ No ☐
Dissemination on the website and on the institutional social networks of the organization and the project	Yes ☐ No ☐
Use in publications, reports and dissemination materials, including those addressed to the European Union	Yes ☐ No ☐
Mention of the first name next to the material disseminated	Yes ☐ No ☐
Participation in interviews or statements to the media	Yes ☐ No ☐

Consent may **be revoked at any time** by written communication addressed to the organization, although the revocation does not extend to materials already disseminated on platforms outside the control of the entity.

Signature of the parent or legal representative: Date:

Consent of the minor (from 14 years old): Date:

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Annex VII. Accessible language version

Text addressed to children and adolescents participating in the organization's activities.

You have the right to be safe with us

- No one can hurt you, hit you, insult you, humiliate you, or touch you in a way you don't like.
- No one can ask you to keep a secret about something that makes you feel bad.
- Your opinion matters. You can ask, give your opinion and say no.
- No one can treat you worse because of your background, your religion, your language, your appearance, your disability, or who you are.
- No one can take photos or record you without you and your family knowing and giving permission.
- If something worries you, even if you are not sure if it is important, you can tell it.

Who can you tell?

- Any adult on the team you trust.
- To our person responsible for protection: Arturo J. González Ascaso · **677 259 117** · ajgonzalez**@innetica.org**
- To the telephone number for help for children and adolescents: **116 111** (it is free and does not appear on the telephone bill).
- To the ANAR Foundation: **900 20 20 10**.
- If it is urgent and there is danger: **112**.

We are going to listen to you, we are going to believe you and we are going to help you. Telling it is never a problem: it is the right thing to do.