

FOUNDATION FORUM FOR CHILDREN AND YOUTH DEVELOPMENT AND DIGITAL CULTURE — LINK

UIC 208867991 · public-benefit non-profit legal entity · linkforum.org

CHILD PROTECTION AND SAFE PARTICIPATION POLICY

(Политика за закрила и безопасно участие на децата)

In case of doubt — the decision is made in favour of the child

Drafted in accordance with the Keeping Children Safe International Child Safeguarding Standards (Policy · People · Procedures · Accountability) and the requirements of the EU Citizens, Equality, Rights and Values (CERV) programme

Organisation	Foundation Forum for Children and Youth Development and Digital Culture — LINK, UIC 208867991
Adopted by	The Board of Trustees
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Safeguarding focal point	Anna-Maria Agafonova
Reporting channel	signal@linkforum.org
Published at	linkforum.org — full text in Bulgarian and English

Immediate danger

The safety of the child is secured first and emergency assistance is sought on 112. An internal report to the Foundation never replaces or precedes notification of the competent authorities.

Reporting to the Foundation

Anna-Maria Agafonova · signal@linkforum.org. Where a report concerns the focal point, a member of the Board of Trustees or the Executive Director, or there is any other conflict of interest, the report is submitted to an unaffected member of the Board of Trustees and/or directly to the competent state authority — the Social Assistance Directorate, the State Agency for Child Protection or the Ministry of Interior.

SECTION I. POLICY (Standard 1)

Article 1. Purpose and statement of commitment

The Foundation Forum for Children and Youth Development and Digital Culture — LINK (hereinafter "the Foundation") is committed to creating an environment in which the rights, dignity, personal integrity and wellbeing of every child come first, and places the safety and best interests of the child at the heart of its mission and of the way it works. The purpose of this Policy is to ensure that the risk of violence, abuse, exploitation, neglect, bullying, discrimination,

degrading treatment, unlawful disclosure of information and other harm is prevented, recognised and managed in time, and that upon any concern or report the Foundation responds immediately, appropriately and in the best interests of the child. The Foundation applies zero tolerance to any form of violence, abuse or exploitation of children by its team, associates or partners.

The Policy reflects children's rights to protection as set out in the United Nations Convention on the Rights of the Child and is structured in accordance with the four Keeping Children Safe International Child Safeguarding Standards: Policy, People, Procedures and Accountability.

Article 2. Scope and binding effect

The Policy applies to all in-person and online activities, events, trainings, workshops, mentoring and one-to-one sessions, research, campaigns, travel, visits, overnight stays, transport, communication and media activities, and to the processing of information, photographs, video, audio or stories of children — in Bulgaria and abroad, independently and in partnership.

Bound by it are the members of the Foundation's bodies (Board of Trustees and Executive Director), employees under employment and civil-law contracts, volunteers, trainees and interns, mentors, jury members, trainers, consultants, photographers, contractors, subcontractors, partners and any other person who acts on behalf of the Foundation or obtains access to children or to information related to them (hereinafter jointly "obliged persons"). The Policy binds the obliged persons both within and outside the work environment: they represent the Foundation at all times.

In the event of a conflict between operational convenience, publicity, a programme result or the interest of an adult, on the one hand, and the safety or best interests of the child, on the other, the Foundation chooses the solution that protects the child. Where applicable law, a contract or a donor rule sets a higher requirement, the higher requirement applies.

Article 3. Core principles

- Best interests of the child: every decision takes into account the child's specific age, maturity, needs, opinion and vulnerability.
- Equal protection: every child is entitled to protection without discrimination and irrespective of origin, gender, identity, disability, health or social status, beliefs, family environment or any other characteristic.
- Participation and voice: children receive understandable information and a genuine opportunity to ask questions, to refuse and to be heard.
- Zero tolerance of violence and exploitation: no act, omission, pressure, punishment, manipulation or contact that causes or creates a risk of harm is permitted.
- Prevention and proportionality: risks are assessed in advance and measures are tailored to the activity and the specific children; the "do no harm" principle applies to the design of every activity.
- Personal responsibility: every obliged person bears personal responsibility for keeping children safe.

- Need-to-know and confidentiality: information is shared only with those who need to know it, except where the protection of the child requires notification of a competent authority.
- No adverse consequences for the reporter: a report made in good faith leads to no punishment, pressure or exclusion from participation.

Article 4. Definitions

Term	Meaning for this Policy
Child	Every person under the age of 18 (UN Convention on the Rights of the Child; Article 2 of the Bulgarian Child Protection Act).
Harm	Physical, emotional or sexual abuse; sexual exploitation; neglect; bullying, including cyberbullying; discrimination; degrading treatment; commercial exploitation; dangerous conduct; digital violence, including online grooming and sexual extortion; violation of personal integrity or any other adverse consequence.
Child safeguarding	The system of preventive and responsive measures through which the Foundation ensures that its people, activities, partners, data and communications do no harm to a child and do not expose a child to risk, and that every concern is reported to the competent authorities.
Report / concern	Information, an observation, a disclosure by a child, a complaint or a suspicion that a child has been harmed, is at risk, or that the rules have been breached. Proof is not required.
Informed consent	Freely given, specific and comprehensible consent, expressed after information is provided on the purpose, manner of participation, risks, use of data and the right to refuse or withdraw, where consent is the applicable legal basis.
Child's assent	The child's age- and maturity-appropriate affirmative wish to take part. Refusal or visible discomfort is respected even where an adult has given permission.

Article 5. Legal framework

The Policy is applied in accordance with: the UN Convention on the Rights of the Child; the Bulgarian Child Protection Act, including the duty to report under Article 7 and the rules on the protection of the child's personality; the Bulgarian Non-Profit Legal Entities Act; Regulation (EU) 2016/679 (General Data Protection Regulation) and the Bulgarian Personal Data Protection Act; Regulation (EU) 2022/2065 (Digital Services Act) and Regulation (EU) 2024/1689 (Artificial Intelligence Act), insofar as relevant to the digital activities; and the Foundation's Founding Act. The Policy is an organisational document and does not replace individual legal assessment: in a specific case, the current version of the applicable law is verified.

Article 6. Adoption, publicity and accessibility

The Policy is adopted by the Board of Trustees — the supreme collective body of the Foundation. Responsibility for its overall implementation rests at the highest level of management.

The Policy is public and transparent to everyone who comes into contact with the organisation: its full text — including the rules on recruitment and vetting, the Code of Conduct, the reporting procedure and the training requirements — is published prominently on the Foundation's website (linkforum.org) in Bulgarian and in English. The Policy is provided to all obliged persons, partners and donors, and — in a form they can understand — to the children, parents and guardians (Annex 5 contains a child-friendly version). A copy of the Policy is attached to every contract and agreement whose performance involves contact with children. Only operational details whose disclosure would endanger a child or an ongoing review remain confidential.

SECTION II. PEOPLE (Standard 2)

Article 7. Responsibilities

7.1. Board of Trustees

- adopts the Policy, provides the necessary human and financial resources and oversees its application;
- arranges independent handling in the event of a conflict of interest or where a report concerns the focal point, a member of a governing body or a member of their family;
- decides on organisational measures, contractual consequences and improvements to the system;
- ensures a review of the Policy after a significant incident or a change in the activities or applicable requirements.

7.2. Safeguarding focal point

Anna-Maria Agafonova receives and registers reports at signal@linkforum.org, coordinates the initial assessment and safety actions, keeps restricted access to the documentation, maintains the registers under Article 23 and ensures notification of the Board of Trustees and of the competent authorities where necessary. Her name and contact channels are published on the website and communicated to all participants in activities involving children. Where a report concerns the focal point, a relative of hers, a member of a body of the Foundation, or there is any other conflict of interest, the report is submitted to an unaffected member of the Board of Trustees and/or directly to the competent state authority — so that reporting never depends on a single channel.

7.3. Activity leaders

- carry out and document a risk assessment before the activity starts;
- verify the consents, emergency contacts, accessibility, responsibilities and reporting channels;
- ensure sufficient supervision, a safe environment and the possibility for the child to seek help;

- suspend or modify an activity where the measures are insufficient.

7.4. All obliged persons

- know and sign the Policy and the Code of Conduct before first taking part;
- recognise signs of risk, respond calmly and report immediately;
- do not investigate on their own and do not promise complete secrecy;
- cooperate in good faith and maintain confidentiality.

Article 8. Safe recruitment and vetting of staff, trainees and volunteers

The Foundation integrates child safeguarding into every stage of the recruitment of employees, trainees, interns, volunteers, mentors, trainers and consultants. Before a role is assigned, it is determined whether it involves direct contact, one-to-one contact, transport, overnight stays, digital communication or access to sensitive information about children — the higher the risk, the more thorough the measures. The following steps are mandatory:

- every job, traineeship or volunteering advertisement and every role description expressly states the Foundation's commitment to child safeguarding, the clear boundaries and responsibilities of the position and the expected contact with children;
- every interview includes a discussion of the candidate's attitudes to and understanding of child safeguarding, including specific questions on behaviour in situations of risk;
- identity is verified against an identity document, and professional experience and qualifications against documentary proof;
- at least two references are taken, with verification of the referees' identity; for roles involving direct work with children, at least one reference addresses the candidate's experience of working with children where such experience is required;
- before being admitted to any activity involving contact with children or access to children's data, the candidate submits a criminal record certificate issued no more than six months earlier, signs a declaration that no criminal or disciplinary proceedings for acts against children are pending against them, and the checks required by law for engaging persons in activities with children are carried out (including the checks arising from the transposition of Directive 2011/93/EU on combating the sexual abuse of children); persons convicted of intentional publicly prosecutable offences against the person or against children are not admitted to such activities;
- the offer of a contract, or of engagement as a volunteer or trainee, is conditional on the successful completion of the above checks; the checks apply in full to trainees and volunteers, not only to employees;
- a probationary period (for employment) or an initial period of mentoring and supervision (for volunteers and trainees) is applied, during which the person has no unsupervised access to children without the presence of another vetted obliged person;
- before first taking part, the person receives, reads and signs the Policy and the Code of Conduct (Annex 1); the signed copies are kept in the person's file.

A person is not admitted to unsupervised or unregulated contact with children where a mandatory check has not been completed, there is an incompatibility with the role, or there is an unmanageable risk. Refusal to comply with the Policy is grounds for refusing or terminating the engagement.

Article 9. Code of Conduct

9.1. Required behaviour

- treating every child with respect, patience and age-appropriate language;
- clear professional boundaries and visible, accountable and purposeful interaction;
- listening without blame, pressure or suggesting answers;
- respect for personal space; physical contact only where necessary, appropriate, wanted by the child and safe;
- obtaining prior written informed consent from a parent/legal representative for every participation of a child and for every photograph, video or audio recording;
- encouraging children to ask questions, to say "no", to end their participation and to report;
- immediately stopping dangerous or degrading behaviour and reporting under Article 17;
- using only approved, official and traceable channels, devices and materials for work.

9.2. Prohibited behaviour

- physical punishment, violence, threats, humiliation, mockery, discrimination, intimidation or isolation as punishment;
- sexualised language, insinuation, imagery, jokes, contact, relationships, exploitation or any sexualised behaviour towards a child;
- using a child for a personal, financial, political, religious, reputational or other incompatible purpose;
- personal secrets, special treatment, gifts, money or privileges that create dependency or inequality; asking or allowing a child to keep a "secret" from their parents;
- being alone with a child out of the sight of others, except in urgent necessity with immediate notification;
- communication through personal accounts, disappearing messages, secret chats or content outside the purpose of the activity;
- photographing, recording, publishing, forwarding or storing images and data outside the approved purpose and conditions;
- providing alcohol, tobacco or other substances prohibited for children; using alcohol or drugs, or conduct that reduces the ability to provide safe care;
- investigating on one's own, confronting an alleged perpetrator or requiring the child to repeat their account multiple times;

- concealing, delaying or obstructing a report.

Breach of the Code of Conduct is grounds for disciplinary liability, termination of the engagement or removal from the activity — independently of and in parallel with notification of the competent authorities where the act discloses indications of a criminal offence or of a child at risk.

Article 10. Training — induction and continuous

No obliged person begins work with children before completing induction training on this Policy, the Code of Conduct and the reporting procedure. All team members and regular associates undergo refresher child-safeguarding training at least once a year, and additionally whenever the Policy or the legislation changes or following an incident. Training is tailored to the role (direct work with children, online moderation, communications and work with images, management). The Foundation keeps a register of the training delivered and of attendees; the records serve as evidence in checks by donors and institutions. Participants, children and parents receive a short, understandable version of the rules and the help channels. The safeguarding focal point has guaranteed access to specialist advice and support in handling cases.

Article 11. Partners, contractors, visitors and public figures

- before any joint activity, it is verified that the partner has compatible rules and the capacity to ensure safety;
- the contract or written agreement defines the applicable policy, the roles, access to children and data, the reporting channels, notification and the consequences of breach; a copy of this Policy is attached to the contract;
- the Foundation does not delegate its ultimate responsibility for safety in activities it organises or controls;
- media, guests, donors and public figures receive a prior briefing, sign a declaration of compliance with the Policy and do not interact with children without appropriate supervision and consent;
- in the event of incompatible practice, the activity is suspended or the partnership terminated in accordance with the contract and applicable law.

SECTION III. PROCEDURES (Standard 3)

Article 12. Planning and risk assessment

Every activity involving children has a prior written risk assessment (Annex 2), carried out by the activity leader jointly with the safeguarding focal point and updated upon change. The assessment is not a formality: it determines whether the activity may start and under what conditions. Child safeguarding is integrated into the Foundation's existing processes — strategic planning, budgeting, recruitment, project cycle management, procurement and partnership agreements — so that it is a feature of every key aspect of operations.

Area	Minimum questions
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Participants	Age, individual needs, accessibility, language, health information only where necessary, relationships between participants.
Venue	Controlled access, sanitary conditions, evacuation, visibility, designated safe spaces, accessibility.
Team and supervision	Clear roles, enough prepared adults, a rule for avoiding isolated one-to-one situations, a substitute in case of absence.
Activity	Physical, emotional, social and digital risks; materials and equipment; sensitive topics; the possibility to opt out.
Communication and data	Approved channels, minimal data, access, storage, photographs and recordings, informing children and parents.
Travel and emergencies	Route, transport, emergency contact, medical assistance, actions in case of a lost child, delay or incident.
Partners	Compatible rules, a responsible person, contractual obligations, management of reports and data.

Where the residual risk cannot be reduced to an acceptable level, the activity does not start or is suspended.

Article 13. One-to-one work and mentoring

- one-to-one contact is planned in advance, justified and known to the activity leader and to the parent/legal representative where applicable;
- meetings take place in a professional, visible or verifiable environment; private homes and informal venues are avoided;
- where possible, a rule of presence or availability of more than one prepared adult applies; a deviation is permitted only after assessment, approval and documented measures;
- the start, end, purpose and significant circumstances are noted without unnecessary details of private life;
- the mentor does not become the sole source of support and does not create dependency, secrecy or a relationship outside the professional role.

Article 14. Online and digital activities

- pre-approved platforms, organisational accounts and privacy and access-control settings are used;
- no open forums or chats for children are maintained without moderation; all public content created by or with the participation of children passes editorial review by an adult before publication;
- children and parents/legal representatives receive information about the platform, the rules, moderation, recording and how to report;

- communication is in group format or visible to another authorised adult; private messages are used only where necessary, accountable and within the approved channel;
- no disappearing messages, secret groups, personal accounts or informal adding of children as contacts;
- recording, screenshots or sharing of content is permitted only with a predefined purpose, an appropriate legal basis, prior information and the necessary consents;
- the moderator may stop a chat, camera, microphone or participation in case of risk, without humiliating the child;
- links, files and external applications are checked in advance; no more personal data is required than necessary; geotagging of images is disabled; the Foundation's accounts and devices are periodically checked;
- in the event of digital violence, grooming, sexualised content, threats, extortion or dissemination of intimate images, the available data is preserved without further dissemination and the reporting procedure under Article 17 is triggered.

Article 15. Events, travel, transport and overnight stays

15.1. Events

- there is registration, access control, a clear procedure for handing over and collecting a child, and identified persons the child can approach;
- the activity and rest areas are safe, accessible and age-appropriate; risk zones are restricted;
- external visitors, media and photographers have no uncontrolled access to children.

15.2. Travel and transport

- there is a written programme, route, emergency contacts, the necessary consents and information on specific needs;
- licensed drivers, roadworthy vehicles and the applicable safety equipment are used;
- solo travel of one adult with one child is avoided; in case of exceptional necessity, the circumstances are notified and documented.

15.3. Overnight stays

- accommodation conditions, room allocation, personal space, night supervision and access by external persons are assessed in advance;
- an adult does not share a room or bed with a child, except where the adult is the child's parent/legal representative or in a case of expressly justified necessity, permitted by law and supported by safety measures;
- sanitary facilities and procedures for changing and personal care ensure dignity, privacy and appropriate support.

Article 16. Informed consent, images and children's personal data

16.1. Informed consent and the child's participation

Before participation, the Foundation provides the child and the parent/legal representative with clear information on the purpose, activities, duration, venue or platform, responsible persons, expected risks and measures, necessary data, photographing/recording, the channels for questions and reports, and the right to refuse. Consent to participation and consent to photographs, video, audio, interviews or publicity are collected separately (Annex 4); consent is never presumed from silence, presence, a pre-ticked box or participation in another activity; the forms state specific purposes and channels — blanket permissions without clarity of use are not used. Alongside the required parental consent, the child's age-appropriate assent is sought (Annex 5); where the child refuses or shows discomfort, participation is stopped or adapted. Where processing rests on another legal basis, the Foundation does not present consent as mandatory, but informs about the actual basis and the rights. Withdrawal of consent applies to future processing; the Foundation explains what can and cannot be reversed or erased due to lawful use already made or another obligation.

16.2. Photographs, video, audio, interviews and stories

A photograph, video, voice, name, story and other identifying elements may constitute personal data. The Foundation creates and uses them only with a defined purpose, an appropriate legal basis, minimal scope, prior information and security measures. Before any shoot, the purpose, the responsible person, the publication channels, the retention period and the persons with access are defined. The necessary consents are obtained; for the disclosure of information and data about a child, the special rules of the Bulgarian Child Protection Act are observed, including the requirement for the consent of the child as well, where the child has reached the age of 14. The child is also asked at the moment of recording and may refuse, switch off the camera or leave the frame without any negative attitude. Images are dignified and the context accurate; no footage is published that is degrading, sexualised, compromising, medically sensitive or allows the identification of an address, school, route, location or vulnerability. Where possible, group shots, first name only or anonymisation are used, and location metadata is removed. Personal devices and personal cloud accounts are not used, except in a pre-approved necessity with immediate transfer to the Foundation's secure storage. A partner, media outlet, photographer or donor receives material only under agreed restrictions compatible with the initial information and legal basis. A request to stop future use or to remove material is considered without undue delay and documented. Engaged photographers, camera operators and journalists are subject to the vetting under Article 8.

No consent to publicity

A child for whom there is no appropriate basis and the necessary consents for recording and publication participates on equal terms. The organiser provides a practical solution: a no-photo zone, a neutral distinguishing sign, framing out of shot or subsequent blurring.

16.3. Personal data, confidentiality and documentation

- only the data necessary for the specific activity, for safety or for a legal obligation is collected;

- children receive short and understandable information; parents/legal representatives receive the applicable privacy notice;
- access is role-based and restricted; documents on reports, health needs and other sensitive circumstances are kept separately from general lists;
- retention periods or criteria are defined in advance; data is erased or anonymised when no longer necessary, unless a legal or evidentiary obligation requires otherwise;
- reports are shared only on a need-to-know basis; confidentiality is never used to prevent mandatory notification of a competent authority;
- in the event of loss, unauthorised access, misdirected sending or publication, the consequences are contained, the information about the incident is preserved and the applicable data-breach procedure is triggered.

Article 17. Reporting and immediate response

17.1. Who may report

A report may be made by a child, a parent, a legal representative, a team member, a volunteer, a partner, a witness or any other person. A report may contain a fact, an observation, a disclosure by a child, online content or a reasonable concern. The principle is "if in doubt, speak out": the reporter is not required to prove a breach.

17.2. Channels

- to the Foundation: Anna-Maria Agafonova — signal@linkforum.org, orally on the same day and in writing within 24 hours;
- in the event of a conflict of interest (including where the report concerns the focal point, a relative of hers or a member of a governing body): to an unaffected member of the Board of Trustees and, where necessary, directly to the competent state authority;
- in case of immediate risk to life, health or safety: telephone 112;
- for advice and help for children: National Children's Helpline 116 111;
- where there is information that a child needs protection: the Social Assistance Directorate / Child Protection Unit for the child's place of residence, the State Agency for Child Protection or the Ministry of Interior — in fulfilment of the duty under Article 7 of the Bulgarian Child Protection Act; the legal duty of immediate notification does not depend on internal approval, and the internal review never replaces or precedes it.

17.3. How to respond to a disclosure by a child

- stay calm, ensure a safe place and listen;
- tell the child they did the right thing, that they are not to blame and that you will seek help;
- do not promise complete secrecy; explain that the information will be shared only with the people who need to help;
- do not ask leading or repeated questions; clarify only what is necessary for immediate safety;

- write down the child's words, the visible facts, the time and the place as precisely as possible; separate observations from assumptions;
- report immediately and follow the instructions of the competent authorities.

17.4. Action matrix

Situation	Immediate action	Next step
Immediate danger, serious injury or urgent medical need	Ensure safety; 112; first aid only by a competent person.	Notify the focal point; preserve facts and documents.
Disclosure, observation or suspicion of violence/exploitation	Calm listening; no investigation; immediate report.	Notify the competent authority where a child needs protection; measures to prevent further risk.
Report against a person connected with the Foundation	Suspend access to children where necessary for safety, without prejudging guilt.	Independent handling; cooperation with the authorities; contractual/disciplinary measures as established.
Report against the focal point or a member of a governing body	Direct notification of an unaffected member of the Board of Trustees and of an external authority where necessary.	The Board of Trustees designates a person independent of the case.
Digital incident or unlawful disclosure of data	Restrict access and dissemination; preserve the evidence without forwarding.	Assess the risk to the child and the notification obligations; technical and organisational measures.

Article 18. Internal handling of a report

- the report is registered with restricted access; receipt is confirmed to the reporter where possible and safe;
- an initial assessment is made of the immediate risk, the need for medical assistance, external notification, conflicts of interest and separation measures, including the temporary removal of the person concerned from contact with children until the case is clarified, without this prejudging the outcome;
- the Foundation takes no action that could obstruct a competent authority; the internal review is limited to what is necessary for safety, management and contractual decisions;
- the child concerned receives appropriate information and support; a parent/legal representative is notified, except where this could increase the risk or contradict the instructions of a competent authority;
- the good-faith reporter and the person against whom the report is directed receive appropriate care and protection until the review is concluded;

- the decisions, grounds, notifications, protective measures and follow-up actions are documented; serious cases and reports against team members are reported to the Board of Trustees;
- lessons learned are used to improve training, procedures and risk assessments, without unnecessary disclosure of identity.

A good-faith report is considered without prejudice and leads to no adverse consequences for the reporter, even if it is not confirmed. Knowingly false allegations may be dealt with under the applicable procedure, but an unconfirmed report is not in itself considered to be in bad faith.

SECTION IV. ACCOUNTABILITY (Standard 4)

Article 19. Monitoring, annual report and review

The application of the Policy is monitored on an ongoing basis by the safeguarding focal point and the Executive Director; activity leaders monitor practical application and remedy non-conformities. At least once a year, the Board of Trustees considers a report on the application of the Policy, covering: the number and nature of reports received and the action taken (without data allowing children to be identified); the training delivered; the risk assessments carried out; and the weaknesses identified and lessons learned from practice. The Policy is reviewed at least every two years, and additionally after every significant incident, change in legislation, activities or technologies, or an identified pattern of risk; every three years its application is subject to external evaluation by an independent evaluator. Lessons from individual cases feed into amendments of the Policy and the procedures.

Article 20. Transparency towards the public

Information on the child-safeguarding measures and their application is included in the Foundation's annual activity report, which is filed for publication in the Bulgarian register of non-profit legal entities and published on the website. Upon request, the Foundation provides donors, partners and institutions with evidence of application: signed declarations, training registers, risk assessments and anonymised data on the handling of reports.

Article 21. Breaches and consequences

A breach of the Policy may lead to removal from an activity, temporary restriction of access, termination of volunteer, civil-law, employment or partnership relations, contractual action and notification of the competent authorities. The measure is determined according to the safety of the child, the seriousness, the available information and applicable law; protective measures may be taken before the final clarification.

Article 22. Resources

The Board of Trustees and the Executive Director make available the human and financial resources necessary for the application of the Policy, including time and training for the

safeguarding focal point, funds for team training, and access to specialist external advice in handling cases.

Article 23. Registers and documentation

The Foundation maintains, under conditions of confidentiality: a register of the signed declarations of acceptance of the Policy and the Code of Conduct; a register of training delivered; a register of risk assessments; and a confidential register of reports and of the action taken. Retention periods are determined in accordance with the applicable data protection legislation.

Article 24. Legal framework and verified sources

- Bulgarian Child Protection Act — current text (Ministry of Justice, justice.government.bg) — including the duty of immediate notification under Article 7, the protection of the child's personality and the applicable checks for professional work with children;
- Regulation (EU) 2016/679 — EUR-Lex — principles, legal bases and special conditions for children's data;
- Bulgarian Personal Data Protection Act — Commission for Personal Data Protection (cpdp.bg);
- State Agency for Child Protection — "Who protects your rights" (sacp.government.bg) — competent authorities, reporting and the National Children's Helpline 116 111;
- Social Assistance Agency — territorial structures (asp.government.bg) — contacts of the Social Assistance Directorates and Child Protection Units;
- Keeping Children Safe — International Child Safeguarding Standards (keepingchildrensafe.global);
- UNICEF — Child safeguarding framework and tools — practical templates for codes, online sessions, consent and incident reporting.

Article 25. Entry into force

This Policy was adopted by decision of the Board of Trustees of 28.09.2026, enters into force on the date of its adoption and is published in full at linkforum.org in Bulgarian and English. Annexes 1–6 form an integral part of it.

Annex 1. Declaration of compliance with the Policy and the Code of Conduct

I, the undersigned, confirm that I have received, read and understood the Child Protection and Safe Participation Policy of the Foundation Forum for Children and Youth Development and Digital Culture — LINK.

I undertake:

- to put the safety, dignity and best interests of the child before personal or organisational convenience;
- to observe the professional boundaries and the rules for in-person, one-to-one, online, travelling and media activities;
- not to commit, encourage, conceal or tolerate violence, exploitation, bullying, discrimination or unlawful use of data and images;
- to report immediately upon any concern and not to investigate on my own;
- to cooperate with safety measures and to maintain confidentiality within the limits permitted by law;
- to disclose any conflict of interest or circumstance that may make my role incompatible with work with children.

Name and role

Date

Signature

Annex 2. Activity risk assessment form

Field	To be completed by the activity leader
Title and purpose	
Date/period and venue/platform	
Leader and team	
Children involved — age groups and specific needs, without unnecessary data	
Type: in-person / online / one-to-one / travel / overnight / media activity	
Necessary consents and notifications	
Emergency contact and local competent services	

Hazard	Who may be affected	Existing measures	Additional measures and owner	Residual risk

Checklist and approval

- ☐ venue, access, evacuation and accessibility
- ☐ sufficient supervision and clear roles
- ☐ one-to-one and online contacts
- ☐ transport and overnight stays
- ☐ health and emergency needs
- ☐ data, photographs, video and publications
- ☐ partners, guests, media and contractors
- ☐ a reporting channel understandable to the children

Prepared by

Approved by

Date

Annex 3. Confidential report/incident form

Completing the form

Record facts and exact words. Do not make diagnoses, do not conclude on guilt and do not question the child. In immediate danger, act for safety first and call 112.

Field	Information
Date and manner of receipt	
Name and contact of the reporter, if known	
Child — only the necessary identifying data	
Venue/platform and related activity	
What was seen, heard or disclosed — exact words and facts	

Immediate risk and action taken	
Other persons who may have information	
Documents/files/messages — where preserved	
Whom I notified and when	
Conflict of interest	
Subsequent instructions and measures	

Completed by

Date

Signature

Annex 4. Informed consent of a parent/legal representative

This template is adapted to the specific activity and provided together with the applicable privacy notice.

Activity: _____

Organiser/leader: _____

Venue/platform and period: _____

Child: _____

Parent/legal representative: _____

Information I received

- purpose, programme, manner of participation and the possibility to refuse;
- main risks, safety measures and emergency actions;
- necessary personal data, purpose, access, storage and rights;
- channel for questions and reports: signal@linkforum.org;
- the separate choices for photographs, video, audio, interviews and publication.

Consent to participation

☐ I give my informed consent for the child to take part in the described activity under the stated conditions.

☐ I do not consent to participation.

Separate choices on images and publicity

Refusal under these fields does not cancel the consent to participation and does not lead to less favourable treatment. Each choice applies only to the described activity and the stated channels.

- ☐ Photographs for the internal documentation of the activity.
- ☐ Photographs on the Foundation's website and official profiles.
- ☐ Video/audio recording and publication in the expressly described channels: _____
- ☐ Interview/story indicating only: _____
- ☐ Provision to the following partners/media for the specific purpose: _____
- ☐ I do not consent to photographs, video, audio, interviews or publicity.

Specific needs important for safe participation

Emergency contact: _____

I confirm that I had the opportunity to ask questions and that I may request a change or withdrawal of consent through the Foundation, under the conditions of applicable law.

Name

Date

Signature

Annex 5. Child's assent — child-friendly version

For the child

You have the right to know what we will do, to ask questions, to say "no", to ask for a break or to stop taking part. If something worries you, you can tell an adult you trust or write to signal@linkforum.org.

Activity: _____

I understand:

- ☐ what we will do and why;
- ☐ who will be with me and whom I can turn to;
- ☐ that I may not answer a question or may stop;
- ☐ what photographs/recordings are planned and where they may be shown;
- ☐ that I can say I do not want to be photographed or recorded;
- ☐ how to report or ask for help.

My choice

- ☐ I want to take part. ☐ I do not want to take part.

☐ I agree to be photographed under the explained conditions. ☐ I do not want to be photographed or recorded.

A question or condition that matters to me: _____

Child's name

Date

Signature/mark

Annex 6. Quick action card

1. Ensure safety

In immediate danger — 112. Do not leave the child alone with a person about whom there is a concern.

2. Listen

Calmly, without promising complete secrecy, without leading questions and without investigating on your own.

3. Record

The exact words, the visible facts, the place, the time and the action taken. Separate facts from assumptions.

4. Report immediately

Anna-Maria Agafonova — signal@linkforum.org. Where a child needs protection — the Social Assistance Directorate / Child Protection Unit, the State Agency for Child Protection or the Ministry of Interior. For help and advice: 116 111. In a conflict of interest — an unaffected member of the Board of Trustees or directly the competent authority.

In case of doubt — the decision is made in favour of the child.

Annex 7: Таблица за съответствие с изискванията на CERV / CERV compliance matrix

The table maps each CERV programme requirement and each Keeping Children Safe standard to the corresponding provisions of this Policy.

CERV requirement / KCS standard	Provisions
Standard 1 Policy: written policy, approved by the management body, applicable to all staff and associates, grounded in the UNCRC	Articles 1–6
CPP available online and transparent to everyone who comes in contact with the organisation	Articles 6, 25
Standard 2 People: clear responsibilities, focal points, code of conduct	Articles 7, 9, 11
Clear information on recruitment of staff (including trainees and volunteers), with background checks (vetting)	Article 8
Continuous training of staff	Article 10
Standard 3 Procedures: risk assessment, integration into processes, clear reporting rules for staff	Articles 12–18, Annexes 2, 3, 6
Standard 4 Accountability: monitoring, periodic review, external evaluation, reporting to stakeholders	Articles 19–23