

December 20, 2024
Child Protection Policy of
Jan Nowak-Jeziorański College of Eastern Europe Foundation
in Wrocław

Chapter I Explanation of terms

§ 1.

Glossary

1. Personnel is a person employed under an employment contract, a civil law contract, a member of the Board of Directors or the Council of the Foundation, as well as a volunteer, intern and trainee.
2. The management of the Foundation is the person, body or entity that, within the structure of the Foundation in accordance with applicable law and/or internal documents, is authorized to make decisions about the activities of the Foundation.
3. A child is any person under the age of 18, including a minor serving as a cadre.
4. The guardian of the child is the person authorized to represent the child, in particular his parent or guardian.
5. According to this document, a guardian is also a foster parent.
6. The consent of the child's parent means the consent of at least one of the child's parents/legal guardians. However, if there is a disagreement between the child's parents, the parents should be informed that the case must be settled by the family court.
7. Child abuse should be understood as the commission of a criminal act or a criminal act to the detriment of a child by any person, including a staff member, or a threat to the welfare of a child, including neglect. It is any intentional or unintentional action/inaction of an individual, institution or society as a whole, and any result of such action or inaction that violates the equal rights and freedoms of children and/or interferes with their optimal development. There are 5 basic forms of abuse:
 - a. Physical violence against a child is violence as a result of which a child suffers actual physical harm or is potentially threatened with physical harm. This harm occurs as a result of an act, or failure to act, by a parent or other person legally responsible for the child. Physical violence against a child may be a repeated or one-time act.
 - b. Emotional (psychological) violence against a child is a chronic, non-physical, harmful interaction between a child and an adult, involving both actions and inactions. It includes, but is not limited to: emotional unavailability; emotional neglect; a relationship with the child based on hostility; blame; denigration; rejection; developmentally inappropriate or inconsistent interactions with the child; failure to recognize or acknowledge the child's individuality and mental boundaries between the adult and the child.
 - c. Neglect is when no one makes the child feel important, special and loved, or cares for or supports the child. The child's caregiver is not interested in the child's health, nutrition, and living conditions. Neglect is the failure to meet a child's basic needs and/or respect his or her basic rights by parents, guardians, or other persons charged with the care, upbringing and protection of the child. It includes both isolated situations and an established way of functioning in which the caregiver fails to provide

adequate conditions for the child's physical, cognitive, social, emotional and psychosexual development and well-being.

- d. Sexual violence (child sexual abuse) is the involvement of a child by an adult and/or another child in sexual activity, without physical contact, e.g. exhibitionism; any form of verbal harassment such as having conversations with sexual content inappropriate to the child's age or making sexual comments about the child's appearance and behavior; sexualization of play and image; soliciting contact with pornographic content; grooming, including grooming on the Internet for contact and with physical contact such as touching; forcing the child to touch the perpetrator's body in a sexual manner; and sexual intercourse. Any sexual activity undertaken with a child under the age of 15 is a crime. Sexual exploitation occurs when such activity occurs between a child and an adult or a child and another child if these persons, due to their age or stage of development, are in a relationship of care, dependence or authority.
 - e. Peer violence (peer aggression, bullying) occurs when a child experiences various forms of violence from peers, either directly or through the use of communication technologies (internet and cell phones). It occurs when the action is intended to cause someone distress or harm (intentionality), is systematic (repetitive), and the victim is weaker than the perpetrator or group of perpetrators. It includes verbal, relational, physical, material and electronic violence.
8. Person in charge of child protection – a staff member appointed by the Foundation's management responsible for receiving reports of threats to the welfare of a child and intervening before the competent authorities or institutions.
 9. Person in charge of child protection policy implementing child protection standards – a staff member designated by the Foundation's management who supervises the timely and proper application of child protection standards within the entity.
 10. Personal information of a child is any information that makes it possible to identify the child, including the child's name and image.

Chapter II Recognizing and responding to risk factors for abuse

§ 2.

1. The Foundation's staff is knowledgeable and pays attention to risk factors and symptoms of child abuse as part of their duties.
2. When risk factors are identified, staff engage in a conversation with caregivers, providing information on available support and motivating them to seek help for themselves.
3. Staff monitor the child's situation and well-being.
4. Foundation staff members receive child protection training appropriate to their role at the Foundation and relating to their responsibility for children.
5. Every newly hired staff member, and once every two years every staff member, working with children receives training on:
 - a. the provisions of the Child Protection Policy (applicable policies and procedures);
 - b. expanding skills in recognizing symptoms of child abuse.
6. The responsibilities of the person in charge of the Child Protection Policy implementing the Child Protection Standards include:
 - a. ensuring that the Child Protection Policy is made available on the Foundation's website and premises;
 - b. preparing staff to apply the child protection policy either before they start work or after the policy is amended;

- c. keeping records of the Foundation's employees who have become familiar with the child protection policy either before they start work or after the policy has been amended;
 - d. coordinating the work of updating the policy;
7. The person in charge of child protection is responsible for, as appropriate:
- a. receiving a report on the occurrence of a risk factor of danger to the welfare of the child;
 - b. receiving a report of suspected or inappropriate sharing, dissemination or use of a child's image, or problems revealed in this regard;
 - c. initiation of intervention;
 - d. informing the relevant social welfare center of the need to initiate the "Blue Card" procedure;
 - e. notifying the guardianship court;
 - f. filing a notice of suspicion of a crime committed against a minor;
 - g. keeping records of incidents and interventions, and securing documentation.
8. Duties arising from the role of the person responsible for child protection and child protection policy are performed by a person designated by the management of the Foundation, specifically identified by name, whose personal information should be made available to both staff and children.

§ 3.

Rules for recruitment of personnel

1. Recruitment of members of the Foundation's staff is carried out in accordance with the principles of safe recruitment of personnel. The rules constitute **Appendix [No. 1]** to this Policy.
2. A person accepted for a position related to working with children must absolutely sign the following statements:
 1. (a) a statement of familiarity and commitment to comply with the Child Protection Policy and the Safe Relationship Principles - **Appendix [No. 3]**;
 2. b) statement on countries of residence in the last 20 years, other than the Republic of Poland - **Attachment [No. 4]**;
 3. (c) statement regarding no criminal record for offenses against children (if, for valid reasons, he or she cannot provide information on no criminal record from national criminal records) - **Attachment [No. 5]**.
3. Failure to agree to sign any of the documents listed in paragraph 2 above prevents the establishment of any legal relationship (conclusion of an employment or cooperation contract) with this person.

Chapter III Procedures for intervention in case of security threats

§ 4.

1. Intervention procedures are designed to support staff members in carrying out their legal and social obligation to respond to situations of suspected child abuse. Staff, because of their ability to observe the child in situations that show the effects of abuse, have an important role in the process of recognizing it in the child.
2. The purpose of intervention is to stop child abuse and keep the child safe.

§ 5.

1. If a staff member suspects that a child is being abused, or if such a circumstance is reported by the child or the child's guardian, the staff member is required to make a staff memo and report the information obtained to the Foundation's management. The note may be in writing or by email.
2. The intervention is carried out by the Foundation's management.
3. If abuse is reported from the management of the Foundation, and no person has been designated to conduct the intervention, then the actions described in this chapter are taken by the person who noticed the abuse or to whom the suspected abuse was reported.
4. An intervention card shall be drawn up from the course of each intervention, a model of which is attached as Appendix [No. 6] to this Policy. The card shall be attached to the intervention register kept by the Foundation.
5. All persons who, in connection with the performance of their duties, acquire information about the child abuse or information related to it, are obliged to maintain confidentiality, excluding information provided to authorized institutions as part of intervention activities.

Chapter IV Rules for the protection of the child's image

§ 6

1. The Foundation ensures the highest standards of protection of children's personal data in accordance with applicable laws and the Foundation's RODO Policy.
2. Guidelines for the protection of the child's image containing detailed rules for recording and publicizing the child's image for business and private purposes, as well as rules for storing materials containing the child's image, are attached [No. 2] to the Policy.
3. In all cases, the welfare and dignity of the child must be taken into account.
4. It is forbidden to disclose in the course of registration any information concerning the child, including his or her health, financial situation, and legal situation related to the child's image.
5. All suspicions and problems regarding inappropriate recording and dissemination of children's images should be recorded and reported to the Foundation's management.

Chapter V Monitoring the application of the Policy

§ 7

1. The management of the Foundation shall designate a NAME as the person responsible for *the Child Protection Policy* in the entity.
2. The person referred to in the preceding paragraph shall be responsible for monitoring the implementation of the *Policy*; for responding to signals of violations of the *Policy*; maintaining and analyzing the register of reports; proposing amendments to the *Policy*; and conducting training on the *Policy*.
3. The management of the entity may make changes to the *Policy*, which it shall announce to staff, children and their guardians.

Chapter VI Final regulations

1. The *Policy* comes into force on the date of its announcement.
2. Announcements shall be made in a manner that is accessible to the Foundation's staff, children and their guardians in particular
3. Announcements will be made accessible by posting them in the staff announcement area; sending them via text electronically; posting them on the website; and displaying them in a conspicuous place on the premises, including in an abbreviated version for children.
4. Cooperating entities, where their activities involve contact with children, are required to comply with this *Policy*.

Appendix No. 1

Rules for safe recruitment of personnel at the Jan Nowak-Jezioranski College of Eastern Europe Foundation

1. Before employing a person at the Foundation or establishing cooperation in any other form and entrusting him or her with duties involving work with a child, it is necessary to establish his or her qualifications and competence to work with a child, as well as to exclude the risk of a threat to the welfare and safety of the child on his or her part.
2. In any case, regardless of the basis of employment or the establishment of cooperation, the Foundation must have data to identify the staff and verify the attitude of staff towards children, as well as the sharing of values related to respect towards them and respect for their rights. It is not permissible for a person known only by name to work with children. They cannot be accepted to carry out duties simply because of his or her good intentions.
3. During the recruitment process, it is necessary to obtain:
 - a. personal data of the candidate/s, such as name(s), date of birth, and contact information, which is confirmed, if necessary, by checking the identity document.
 - b. information on:
 - i. education of the candidate/s;
 - ii. professional qualifications of the candidate/s;
 - iii. the course of the candidate's/candidates' previous employment.
4. In order to obtain additional information about the candidate/s, the Foundation may request him/her to provide references from previous places of employment (from a previous employer) or indicate a contact to obtain references. Failure to submit the aforementioned document shall not cause negative consequences for the candidate.
5. Before establishing cooperation with a person, the Foundation is obliged to check whether the person is listed in the Register of Sexual Offenders (Register with restricted access and Register of persons in respect of whom the State Commission for the Prevention of Sexual Exploitation of Minors under 15 years of age has issued a decision on entry in the Register). A printout of the Register shall be kept in the personnel file of the staff member or in other personnel records.
6. The candidate/s shall submit to the employer or other organizer information from the National Criminal Register for the offenses specified in Chapters XIX and XXV of the Penal Code, in Articles 189a and 207 of the Penal Code, and in the Act of July 29, 2005 on Counteracting Drug Addiction (Journal of Laws of 2023, item 172, and of 2022, item 2600), or for the corresponding offenses specified in foreign laws.
7. Candidate(s), having citizenship of a country other than the Republic of Poland, shall additionally submit to the employer information from the criminal record of the country of citizenship obtained for the purposes of professional or volunteer activities related to contact with children.
8. Candidate(s) shall submit to the employer a statement of the country or countries in which he/she has resided in the last 20 years, other than the Republic of Poland and the country of citizenship (if applicable), and shall, at the same time, submit to the employer information from the criminal records of these countries obtained for the purposes of professional or volunteer activities related to contact with children.
9. If the law of the country referred to in para. 7 or 8, does not provide for the issuance of information for the purposes of professional or volunteer activities related to contact with children, information from the criminal records of that state shall be submitted.
10. Where the law of the country from which the information referred to in items 7 or 8 does not provide for its preparation or there is no criminal record in the country, the candidate/s shall

submit to the employer or other organizer a statement to that effect, together with a declaration that he/she has not been validly convicted in that country of criminal acts corresponding to the offenses specified in Chapters XIX and XXV of the Penal Code; in Articles 189a and 207 of the Penal Code; and in the Law of July 29, 2005 on Counteracting Drug Addiction. The candidate/s will also declare that no other judgment has been issued against him or her stating that he or she has committed such criminal acts and that he or she is not obligated by a court judgment, other authorized body or the law to comply with a prohibition on holding any or certain positions, and practicing any or certain professions or activities, related to upbringing, education, recreation, treatment, provision of psychological counseling, spiritual development, practicing sports or pursuing other interests involving minors, or caring for them.

11. The statements referred to in items 8 and 10 are made under penalty of criminal liability for making a false statement. The person making the statement is obliged to include the following clause: "I am aware of the criminal liability for making a false statement." This clause replaces the authority's instruction on criminal liability for making a false statement.
12. In addition, a person accepted for a position related to working with children must absolutely sign a statement that he or she has read the Child Protection Policy and is committed to complying with it.
13. The statement shall be included in the employee's personnel file, and in the absence thereof, attached to the civil contract.
14. Failure to agree to sign the documents listed in para. 11 and 12 prevents the establishment of any legal relationship with this person (conclusion of an employment/cooperation contract).

Appendix No. 2

Rules of protection of the child's image at the Jan Nowak-Jeziorański College of Eastern Europe Foundation

Rules of recording the image of the child by the Foundation

1. Recording of the child's image is possible only if the management of the Foundation has been informed and consented to it. The consent of the parents/legal guardians and the verbal consent of the children themselves must also be obtained.
2. If the child's image is only a detail of a whole such as a gathering, landscape, or public event, the consent of the child's parents/legal guardians is not required.
3. Consent to capture the image should be separated from consent regarding making the image public. If the children's parents/legal guardians have not consented to the recording of the child's image, their decision should be respected and it should be agreed with them in advance how the person recording the event will be able to identify the child, so that the child's image is not recorded in individual and group photos. The solution adopted must not be exclusionary for the child whose image should not be recorded.
4. If the registration of the event will be outsourced to an external person (hired photographer or videographer) or children participate in competitions and/or games recorded by media, care should be taken for the safety of children by:
 - a. requiring the person/company recording the event to comply with these guidelines;
 - b. requiring the person/company recording the event to wear an ID badge during the event;
 - c. not allowing the person/company registering the event to be with the children without supervision by Foundation staff;
 - d. informing parents/legal guardians and children that the person/company recording the event will be present during the event, and making sure that parents/legal guardians have given written permission for their children's image to be recorded.
5. If media representatives or any other person wish to record an event organized by the Foundation and publish the material collected, they must make such a request in advance and obtain permission from the Foundation's management. In such a situation, the management will make sure that the parents/legal guardians have given written permission to record the image of their children. Information should be collected on:
 - a. the name, surname and address of the person or editorial office requesting permission;
 - b. justification for the need to record the event and information on how and in what context the collected material will be used;
 - c. a signed declaration that the information provided is factually correct.
6. Foundation staff shall not allow media representatives and unauthorized persons to record the image of a child in the care of the Foundation without the written consent of the child's parent/legal guardian and without the consent of the Foundation's management.
7. The Foundation's staff shall not put media representatives in contact with children; shall not provide the media with contact to the children's parents/legal guardians; and shall not make statements to media representatives about the child or the child's parent/legal guardian. This prohibition also applies if the staff member is convinced that his/her statement is not recorded in any way. In special and justified cases, the Foundation's management may decide to contact the child's parents/legal guardians to determine the procedure for their consent to media contact.
8. For the purpose of the realization of the media material, the Foundation's management may decide to make available selected premises at the Foundation's headquarters for the purpose

of the recording. The management of the Foundation, when making such a decision, shall instruct the preparation of the room in such a way as to prevent the recording of the children present on the premises of the entity.

Publicizing the image of a child by the Foundation

1. Publicizing by a staff member of the image of a child recorded in any form (photography, audio-video recording) requires written consent of the child's guardian and verbal consent of the child to use his/her image in a specific context.
2. The written consent referred to in paragraph 1. should include information on where the recorded image will be placed and in what context it will be used (e.g. that it will be placed on www.youtube.com for promotional purposes) and by whom.
3. Avoid signing images/recordings with information identifying the child by name. If it is necessary to sign for the child we use only the first name, except when the parent/legal guardian agrees.
4. Publication of photographs is allowed under the rules mentioned above only during the period when the child is a ward of the Foundation, unless the child's parent, foster parent, legal guardian or a child who has reached the age of majority has consented to publication after that time.

Storage of materials containing the child's image by the Foundation

1. Materials containing the child's image must be stored in a manner that is lawful and ensures the protection of children.
2. Analog media containing photos and recordings should be stored in a locked cabinet, and electronic media in a protected folder. Only persons authorized to do so by the Foundation's management may access the secured photos and recordings.
3. Analog and electronic media must be kept for the period required by the law on archiving and/or the period established by the Foundation in its data protection policy.
4. It is forbidden to store electronic materials containing images of children on unencrypted and mobile media, such as cell phones and portable memory devices.
5. Children's images must be recorded using company recording devices (i.e. cell phones, cameras, camcorders). Where the Foundation does not have official devices, it is permissible for staff to use private devices. Such material should be removed every time from the private device as soon as it is placed in the designated analog or electronic media by the entity.

Appendix No. 3

Statement of familiarization with the Child Protection Policy and commitment to comply with it

Statement of familiarization with the Child Protection Policy and commitment to comply with it

(sample)

.....

place, date

I,, PESEL number
..... declare that I have read and understand the child protection policy of
..... and agree to abide by it.

.....

Signature

Appendix No. 4

Statement on countries of residence

STATEMENT ON COUNTRIES OF RESIDENCE

I declare that during the last 20 years I have resided in the following countries, other than the Republic of Poland and/or the country of citizenship:

1.

2.

and at the same time I submit information from criminal records of these countries obtained for the purposes of professional or volunteer activities related to contact with children/information from criminal records/statement of no criminal record.

I am aware of the criminal liability for making a false statement.

.....

Signature and date

Appendix No. 5

Statement of no criminal record

STATEMENT OF NO CRIMINAL RECORD

..... Place and
date

I,, PESEL number
...../

passport number, declare that in the country
..... no criminal record is kept/no criminal record information is
issued.

I declare that I have not been validly convicted in the country
..... of criminal acts corresponding to the offenses
specified in Chapters XIX and XXV of the Criminal Code; in Articles 189a and 207 of the Criminal
Code; and in the Law of July 29, 2005 on Counteracting Drug Addiction, and that no other judgment
has been issued against me stating that I have committed such criminal acts, and that no obligation has
been imposed on me under the judgment of a court, other authorized body or the law, to comply with
the prohibition to hold any or certain positions, and practice any or certain professions or activities,
related to upbringing, education, recreation, treatment, provision of psychological counseling, spiritual
development, sports or the pursuit of other interests by minors, or to the care of minors.

I am aware of the criminal liability for making a false statement.

.....

Signature

Appendix 6

Intervention card

1. Child's name and surname		
2. The cause of intervention (form of harm)		
3. Person notifying of suspected abuse		
4. Description of actions taken other than intervention	Date	Action
5. Meetings with parents	Date	Description of the meeting

/ legal guardians of the child		
6. Form of intervention undertaken (circle appropriate)	<ul style="list-style-type: none"> • notice of suspected crime • request for insight into the situation of the child / family • other type of intervention - 	
7. Intervention data (name of the authority to which the intervention was reported) and date of intervention		
8. Intervention results: actions of judicial authorities, if the organization has obtained information on the results of its own action / action of parents / legal guardians	Date	Action
