

Policy for the protection of minors from abuse

Preamble

The principle applicable to all employees of the Centre is to take action to protect the dignity of the child, for the benefit of the child and in the child's best interests. Each staff member shall treat the child with respect and take into account the child's needs.

It is unacceptable for anyone to use violence against a child in any form. In pursuing these objectives, the Centre's staff shall act within the framework of the applicable law, the Centre's internal regulations and their competences.

Legal acts on the basis of which the Policy for the Protection of Minors from Abuse was developed:

- 1) Act of 13 May 2016 on Counteracting the Threat of Sexual Crime and Protection of Minors (Journal of Laws of 2023, item 1304, 1606 and 2600);
- 2) Act of 29 July 2005 on Counteracting Domestic Violence (Journal of Laws of 2021, item. 1249 and of 2023 pos. 289, 535 and 1606);
- 3) Regulation of the Council of Ministers of 6 September 2023 on the procedure 'Blue Cards' and templates of forms 'Blue Card' (Journal of Laws of 2023 pos. 1870);
- 4) Act of 25 February 1964. - Family and Guardianship Code (Journal of Laws of 2023, item 2809);
- 5) Act of 12 March 2004 on Social Assistance (Journal of Laws of 2023, item 901, 1693, 1938 and 2760);
- 6) Act of 10 May 2018 on Personal Data Protection (Journal of Laws of 2019, item 1781);
- 7) Convention on the Rights of the Child (Journal of Laws of 1991, no. 120, item 526)
- 8) Convention on the Rights of Persons with Disabilities (Journal of Laws 2012, item 1169). Glossary of terms used in the document

Objectives of the Policy for the Protection of Minors against Child Abuse

§ 1

1. The purpose of the Protection of Minors from Harm Policy is:
 - 1) to draw the attention of the Centre's employees, parents (legal guardians) and cooperating entities to the necessity to undertake increased activities for the protection of minors of the Centre's beneficiaries from abuse;
 - 2) to define the scope of the employees' responsibilities in the activities undertaken for the protection of minors of the beneficiaries from abuse;
 - 3) to develop an adequate procedure to be used during the intervention in the case of suspected abuse of minors

2. Employees shall, as part of their duties, pay attention to the risk factors of child abuse, monitor the situation and welfare of the child and apply the principles set out in the Policy.
3. It is unacceptable for staff to use any form of violence against a child.
4. All employees of the Centre, as well as beneficiaries and their parents (legal guardians), are familiarised with the Standards, in accordance with the procedures set out in the content of the Policy.
5. The Director of the Centre designates the Head of the Department for Support of Persons in Crisis as the person responsible for monitoring the implementation of the Policy and responding to signals of their violation, evaluating and modifying the provisions of the Standards and keeping a register of interventions and notifications.
6. The Head of the Administration Department is responsible for monitoring the security of ICT devices with access to the Internet.

§ 2

Whenever in the Policy for the Protection of Children from Abuse is referred to:

1. the Centre - it should be understood as the Crisis Intervention Centre in Lublin;
2. employee of the Centre - it should be understood as a person employed on the basis of an employment contract, civil law contract, as well as a volunteer, trainee or intern performing duties in the Centre;
3. the Policy - it should be understood as the Policy for the Protection of Children from Abuse;
4. Child - it should be understood as any person up to the age of eighteen years;
5. Child's guardian - it should be understood as the person authorised to represent the child, in particular the child's parent or legal guardian, as well as the foster parent;
6. Consent of the child's parent - it should be understood as the consent of at least one of the child's parents/legal guardians. However, if there is no agreement between the child's parents, the parents should be informed that the case should be resolved by the family court;
7. child's personal data - it should be understood as any information that allows the child to be identified;
8. child abuse - it should be understood as committing a criminal act to the detriment of a child by any person, including an employee of the Centre, or endangering the welfare of a child, including child neglect;
9. person in charge of the Internet - it shall be understood to mean the Centre's employee designated by the Centre's Director to supervise children's use of the Internet on the premises of the institution and children's safety on the Internet;
10. person in charge of the Child Protection from Harm Policy - it shall be understood to mean the Centre's employee designated by the Centre's Director to supervise the implementation of the Child Protection from Harm Policy at the Centre.

Principles of staff recruitment

§ 3

1. Recruitment of staff at the Centre is carried out in accordance with the principles of safe recruitment, and the employer aims to verify the candidate's qualifications as best as possible, including an attitude to the values shared by

the Centre, such as the protection of children's rights and respect for their dignity.

2. The Centre shall ensure that persons employed (including contract workers, interns, trainees and volunteers) are suitably qualified to work with children and do not pose a risk to them. When recruiting staff, the Centre may request data (including documents) on:
 - education,
 - professional qualifications,
 - previous employment history of the applicant/candidate.
3. The Centre must be in possession of data enabling it to identify the person it employs, irrespective of the basis of that employment. The Centre should know such data as the name(s), date of birth, contact details of the person employed.
4. Pursuant to Article 21(1) of the Act of 13 May 2016 on Preventing the Risk of Sexual Offences and the Protection of Minors, before allowing an employed person to perform duties related to the care of minors, the Centre is obliged to check the employed person in the Register of Sexual Offenders - restricted access register and the Register of persons in relation to whom the State Commission for Preventing Sexual Exploitation of Minors under 15 years of age has issued a decision on entry in the Register. In order to check the person recruited in the Register, the Centre needs the following data of the candidate/candidate:
 - first and last name,
 - date of birth,
 - pesel,
 - family name,
 - father's name,
 - mother's name.
5. A check in the Register of Sexual Offenders shall be documented by a printout of the feedback generated from the Register, and the inclusion of in the Register shall exclude the possibility of employing the candidate.
6. the candidate/candidate for employment should submit information from the National Criminal Register on having no criminal record in respect of the offences specified in Chapters XIX and XXV of the Penal Code, in Articles 189a and 207 of the Penal Code and in the Act on Counteracting Drug Addiction of 29 July 2005 (Journal of Laws of 2023, item 172 and of 2022, item 2600), or for corresponding offences specified in foreign laws.
7. If a candidate has citizenship other than Polish, he/she should also submit information from the criminal record of the country of citizenship obtained for the purposes of professional or voluntary activity related to contacts with children, or information from the criminal record if the law of that country does not provide for the issuance of information for the aforementioned purposes.
8. The candidate(s) should submit a declaration about the country(ies) of residence in the last 20 years, other than the Republic of Poland and the country of citizenship, made under the pain of criminal liability. A specimen declaration is attached as Appendix No. 1 to the Policy.
9. If the law of the country from which information on no criminal record is to be submitted does not provide for the issuance of such information or does not keep a criminal record, then the candidate/candidate shall submit, under pain of criminal liability, a statement to that effect together with a declaration that he/she has not been validly convicted in that country of offences

corresponding to the offences defined in Chapters XIX and XXV of the Penal Code, in Articles 189a and 207 of the Penal Code and in the Act of 29 July 2005. on Counteracting Drug Addiction and no other judgment has been issued against him/her stating that he/she has committed such criminal offences, and that he/she is not obliged by the judgment of a court, other authorised body or the law to comply with the prohibition to occupy any or specific positions, to perform any or specific professions or activities related to upbringing, education, recreation, treatment, provision of psychological counselling, spiritual development, practising sports or pursuing other interests by minors, or with taking care of them. A model declaration is attached as Appendix 2 to the Policy.

10. The following declaration shall be made under penalty of criminal liability: I am aware of the criminal liability for making a false declaration. This statement replaces the authority's instruction on criminal liability for making a false declaration.
11. A certificate from the National Criminal Register may be requested only in cases where the law expressly indicates that employees in the professions or positions in question are required to have a clean criminal record.
12. Statements, printouts from registers and certificates from the National Criminal Register shall be attached to Part A of the employee's personal file or to the volunteer/trainee/intern's file. In the case of data from the Register of persons, in relation to whom the State Commission for the investigation of cases of acts against sexual freedom and morality against a minor under 15 years of age has issued a decision on entry in the Register, a printout of the website on which the message is displayed, that the person checked is not in the Register, is sufficient..

Identifying and responding to risk factors for child abuse

§ 4

1. Child abuse is any intentional or unintentional action, or inaction of an individual, institution, or society as a whole and any result of such action, or inaction, which violates the equal rights and freedoms of a minor and/or interferes with their optimal development.
2. The following forms of abuse are distinguished:
 - physical violence - violence whereby a minor suffers actual or potential physical harm. This harm occurs as a result of an action or inaction on the part of a parent or other person responsible for the minor, or on the part of a person in whom the minor trusts or has authority over him or her. Physical violence against a minor can be a repetitive or one-off act;
 - psychological violence - is a chronic, non-physical, harmful interaction between a minor and a caregiver, involving both actions as and omissions. It includes, among others. : emotional unavailability, emotional neglect, a relationship with the minor based on hostility, blaming, denigration, rejection, developmentally inappropriate or inconsistent interactions with the minor, failure to recognise or acknowledge the individuality of the minor and the psychological boundaries between the parent and the minor;

- Sexual exploitation - involving a minor in sexual activity which he/she is not capable of fully understanding and giving informed consent to, and/or to which he/she is not developmentally mature and cannot validly consent, and/or which is incompatible with the legal or moral norms of the society in question. Sexual exploitation occurs when such activity occurs between a minor and an adult or a minor and another minor, where those persons, due to their age or stage of development, are in a relationship of care, dependence, authority;
- Neglect of a minor - chronic or incidental failure to meet his/her basic physical and psychological needs and/or to respect his/her fundamental rights, resulting in disturbances to his/her health and/or difficulties in his/her development. Neglect occurs in a minor's relationship with a person who has a duty of care, upbringing, concern and protection to the child.

Principles for safe relationships between staff (volunteers, interns, trainees) institutions and children

§ 5

1. The staff of the Centre are aware of and apply the principles of safe staff-child relationships established at the Centre.
2. The guiding principle of all actions taken by staff is to act for the good of the child and in their best interests. Staff shall treat the child with respect and take into account the child's dignity and needs.
3. It is unacceptable to use violence against a child in any form.
4. In pursuing these aims, the Centre's staff shall act within the framework of the applicable law, the organisation's internal regulations and their own competences.
5. The principles of safe relations between staff and children apply to all staff, co-workers, trainees and volunteers, members of the institution as well as any adult having contact with children in the care of the institution, if such contact is with the consent of the institution and/or on its premises.
6. Knowledge and acceptance of the rules is confirmed by signing a declaration. A model declaration is attached as Appendix 3 to the Policy.
7. Staff are required to maintain a professional relationship with children and each time consider whether their response, message or action towards a child is appropriate to the situation, safe, reasonable and fair to other children. Act in a way that is open and transparent to others to minimise the risk of misinterpreting their behaviour.
8. The worker should be patient and respectful when communicating with children.
9. The worker should listen carefully to children and give them answers appropriate to their age and the situation at hand.
10. a member of staff must not embarrass, humiliate, belittle or insult a child. Nor must a member of staff shout at a child in any situation other than those arising.
11. A member of staff must not disclose sensitive information about a child to unauthorised persons, including other children. This includes the child's image, information about his/her family, economic, medical, welfare and legal situation..

12. When making decisions about a child, the worker should inform and try to take the child's expectations into account.
13. the worker should respect the child's right to privacy. If it is necessary to waive confidentiality to protect the child, this should be explained to the child as soon as possible.
14. The member of staff must not behave in an inappropriate manner in the presence of children. This includes the use of vulgar words, gestures and jokes, making offensive remarks, making references to sexual activity or attraction, and using a relationship of power or physical superiority (intimidation, coercion, threats) towards a child).
15. The worker should reassure children that if they feel uncomfortable about a situation, about a particular behaviour or words, they can tell him or the designated person (depending on the intervention procedures the institution has adopted) and can expect an appropriate response and/or assistance.
16. The staff member should value and respect children's contribution to the activities undertaken, actively involve them and treat them equally regardless of their gender, sexual orientation, ability/disability, social, ethnic, cultural, religious status and world view.
17. the employee shall avoid favouritism towards children.
18. The employee must not:
 - establish any romantic or sexual relationship with the child or make any inappropriate proposals to the child. This also includes sexual comments, jokes, gestures and sharing erotic and pornographic content with children regardless of their form.
 - record the image of the child (filming, voice recording, photographing) for private purposes. This also applies to allowing third parties to record images of children if the Director has not been informed of this, has not given consent and has not obtained the consent of the parents/legal guardians and the children themselves.
 - offer alcohol, tobacco products or illegal substances to children, or use them in the presence of children.
 - accept money or gifts from the child or the child's parents/legal guardians, enter into any relationship of dependence towards the child or the child's parents/guardians that could lead to accusations of unequal treatment or deriving financial benefits and others.
19. All risky situations involving a crush on a child by an employee or a crush on an employee by a child must be reported to management.
20. Any violent action against a child is unacceptable. However, there are situations in which physical contact with a child may be appropriate and meets the principles of safe contact: it is a response to the child's needs at a given moment, takes into account the child's age, developmental stage, gender, cultural and situational context. However, there is no universally applicable appropriateness of all such physical contact, as what is appropriate for one child may not be appropriate for another. Staff should always exercise their professional judgement, listening, observing and recording the child's reactions, asking for consent to physical contact (e.g. hugging) and being aware that even with good intentions, such contact may be misinterpreted by the child or third parties.
21. An employee must not hit, poke, push or in any way violate the physical integrity of a child

22. An employee may not touch a child in a way that may be considered indecent or inappropriate.
23. An employee should always be prepared to explain his or her actions.
24. The employee should not engage in activities such as tickling, pretend fighting with children or rough physical play.
25. The employee should be particularly careful with children who have experienced abuse and harm, including sexual, physical or neglect. Such experiences can sometimes lead to a child seeking to engage in inappropriate or inappropriate physical contact with adults. In such situations, you should respond sensitively but firmly and help the child understand the importance of personal boundaries.
26. Physical contact with a child must never be secret or hidden, involve any form of gratification or arise from a power relationship. If a worker witnesses any of the above behaviours and/or situations from other adults or children, they should always inform the person responsible and/or follow the intervention procedure.
27. In situations requiring childcare and hygiene activities, avoid any physical contact with the child other than necessary. This applies in particular to helping the child dress and undress, eat, wash, change diapers and use the toilet. It is necessary to ensure that the employee is assisted in each of the care and hygiene activities by a different person from the institution.
28. As a rule, contact with children should take place only during working hours and for purposes that fall within the scope of the employee's duties.
29. An employee may not invite children to his/her place of residence or meet with them outside of working hours. This also includes contact with children through private communication channels (private telephone, e-mail, instant messaging, social media profiles).
30. If necessary, the appropriate form of communication with children and their parents/guardians outside working hours is via work channels (e-mail, work telephone).
31. Maintaining social or family relationships (where children and their parents/guardians are close to the staff member) requires that all information relating to other children and their parents/guardians be kept confidential.

Procedures for intervention in the event of suspected child abuse

§ 6

1. Threats to children's safety can take many forms, using different methods of contact and communication.
2. For the purposes of the Policy, the following classification of threats to children's safety was adopted:
 - a. a crime was committed to the detriment of a child (e.g. sexual abuse, child abuse),
 - b. there was another form of harm that was not a crime, such as shouting, physical punishment, humiliation,
 - c. the child's vital needs (e.g. those related to nutrition, hygiene or health) were neglected.
3. For the purposes of the Policy, procedures for intervention in the event of suspicion of acting to the detriment of a child have been distinguished:
 - a. adults (staff, other third parties, parents/legal guardians),

b. another child.

§ 7

1. If an employee suspects that a child is being harmed, or if a child or child's guardian reports such circumstances, the employee is required to prepare a memo and forward the information obtained to the Director/designated person. The memo may be in writing or by email.
2. If there is a suspicion that a child's life is in danger or that they are at risk of serious harm to their health, the appropriate services (police, ambulance) should be immediately notified by calling 112 or 998 (ambulance). The services are notified by the staff member who first received information about the threat and then fills in the intervention card.
3. The person designated to carry out the intervention is the Head of the Crisis Support Department.
4. If abuse is reported by a person designated to conduct the intervention, then the intervention is conducted by the Director of the Centre.
5. If abuse is reported by the management of the institution, but no person has been designated to conduct the intervention, then the actions describe in this chapter are taken by the person who noticed the abuse or to whom the suspicion of abuse was reported.
6. Specialists, in particular psychologists and pedagogues, may be invited to participate in the intervention in order to use their help in talking to the child about difficult experiences.
7. The management of the institution/designated person informs the guardians of the obligation to report the suspicion of child abuse to the appropriate institution (prosecutor's office/police or family and guardianship court, or the nearest social welfare centre).
8. After informing the guardians in accordance with the preceding point, the management of the institution/designated person submits a notification of the suspicion of a crime to the prosecutor's office/police or a request for insight into the family's situation to the district court, family and juvenile department, social welfare centre.
9. An intervention card is prepared for each intervention, the template of which is attached as Appendix 4 to this Policy. The card is attached to the intervention register kept by the institution. The template of the register is attached as Appendix 5 to the Policy.

§ 8

Abuse by an adult

1. In the event that child abuse has been reported, the institution's management/designated person conducts a conversation with the child and other persons who have or may have knowledge of the event and the child's personal situation (family, health), in particular their guardians. The institution's management/designated person tries to determine the course of the event, but also the impact of the event on the child's mental and physical health. The findings are recorded on the intervention card.
2. The institution's management organizes a meeting with the child's guardians, to whom it provides information about the event and the need/possibility of using specialist support, including from other organizations or services.
3. In the event that a crime has been committed against the child, the institution's management/designated person prepares a notification of the possibility of committing a crime and forwards it to the appropriate local police or prosecutor's office.
4. In the event that the conversation with the guardians shows that they are not interested in helping the child, are ignoring the event or in any other way do not support the child who has experienced abuse, the institution's management prepares an application for insight into the family's situation, which it forwards to the appropriate family court.
5. If the findings indicate that the child's guardian neglects the child's psychophysical needs or the family is inefficient in terms of upbringing (e.g. the child wears clothes that are inappropriate for the weather, leaves the place of residence without adult supervision), the family uses violence against the child (the parent/other household member shouts at the child, uses slaps or similar types of physical punishment), the appropriate social welfare centre should be informed about the need to help the family, if the failure to meet the needs results from a situation of poverty, or - in the case of violence and neglect - the need to initiate the "Blue Cards" procedure.
6. If an employee has reported harming a child, then this person is removed from all forms of contact with children (not only the injured child) until the matter is clarified.
7. If a member of the institution's staff has committed a form of harm to the child other than committing a crime to their detriment, the institution's management should investigate all the circumstances of the case, in particular listen to the person suspected of harming, the child and other witnesses to the event. In a situation where the violation of the child's welfare is significant, in particular when discrimination or violation of the child's dignity has occurred, it is necessary to consider terminating the legal relationship with the person who has committed the harm, or recommend such a solution to the superiors of that person. If the person who has committed the harm is not directly employed by the institution, but by a third party, then it is necessary to recommend banning that person from entering the institution, and if necessary, terminating the contract with the cooperating institution.
8. All persons who, in connection with the performance of their official duties, have received information about the harm to the child or information related to it, are obliged to keep this information confidential, excluding information provided to authorized institutions as part of intervention activities.

9. In the event that the suspicion of a threat to the child's safety has been reported by the child's guardians, and this suspicion has not been confirmed, the child's guardians should be informed of this fact in writing.

§ 9

Peer bullying

1. In the event of suspicion of harm to a child by another child staying in the institution (e.g. during group classes), a conversation should be held with the child suspected of harm and their guardians, and separately with the child being harmed and their guardians. In addition, it is necessary to talk to other people who have knowledge of the incident. During the conversations, an attempt should be made to determine the course of the incident, as well as the impact of the incident on the mental and physical health of the harmed child. The findings are recorded on an intervention card. Separate intervention cards are prepared for the child who is harming and the child who is being harmed.
2. A corrective plan should be developed together with the guardians of the harming child in order to change the undesirable behaviours.
3. A plan should be developed with the guardians of the child being harmed to ensure their safety, including ways of isolating them from sources of danger.
4. During the conversations, it should be ensured that the child suspected of harming another child is not being harmed by their guardians, other adults or other children. If such circumstances are confirmed, intervention should also be undertaken in relation to this child.
5. If the child who is harming does not participate in the activities of the institution, it is necessary to talk to the child who is being harmed, other people who have knowledge of the incident, and the guardians of the harmed child in order to determine the course of the incident, as well as the impact of the incident on the child's mental and physical health. The management of the institution organizes a meeting with the child's guardians, who are provided with information about the incident and the need/possibility of using specialist support, including from other organizations or services, and about ways to respond to the incident (informing the family court, informing the school, informing the guardians of the harming child).
6. If the person suspected of harming is a child between 13 and 17 years of age, and their behavior constitutes a criminal act, the local family court or police should also be informed by means of a written notification.
7. If the person suspected of harming is a child over 17 years of age, and their behavior constitutes a crime, then the local police or prosecutor's office should be informed by means of a written notification.

Principles of protection of personal data and image of children in the institution

§ 10

1. The institution ensures the highest standards of protection of children's personal data in accordance with applicable legal regulations.

2. The institution, recognizing the child's right to privacy and protection of personal rights, ensures protection of the child's image.
3. Employees are not allowed to allow media representatives to record the child's image (filming, photographing, recording the child's voice) on the premises of the institution without the written consent of the child's guardian.
4. In order to obtain the consent referred to above, the employee may contact the child's guardian and establish a procedure for obtaining consent. It is not permissible to provide the media representative with the contact details of the child's guardian - without the knowledge and consent of that guardian.
5. If the child's image is only a detail of a whole, such as: a gathering, landscape, public event, the guardian's consent to record the child's image is not required.
6. Sharing photos and videos from the Center's activities serves to document the Center's activities and always takes into account the safety of children. We use photos/videos showing a wide range of children – boys and girls, children of different ages, abilities, levels of ability and representing different ethnic groups.
7. Children have the right to decide whether their image will be recorded and how it will be used by us.
8. The consent of parents/legal guardians to use their child's image is only binding if the children and parents/legal guardians have been informed about the use of the photos/videos and the risks associated with publishing the image.
9. We ensure the safety of children's images by:
 - a) Asking for written consent from parents/guardians and children before taking and publishing a photo/video.
 - b) Providing explanations about what we will use the photos/videos for and in what context, how we will store this data and what potential risks are associated with publishing photos/videos online.
 - c) Avoiding signing photos/videos with information identifying the child by name. If it is necessary to sign the child, we only use the first name.
10. Refraining from disclosing any sensitive information about the child, including health, financial situation, legal situation and related to the child's image (e.g. in the case of individual collections organized by our institution).
11. Reducing the risk of copying and inappropriate use of children's photos/recordings by adopting the principles:
 - a) all children in the photo/video must be dressed, and the situation of the photo/video is not degrading, embarrassing or negatively related to the child,
 - b) photos/videos of children should focus on the activities performed by the children and, if possible, depict children in a group rather than individuals..
12. The Centre refrains from publishing photos of children who are no longer under its care if they or their parents/legal guardians have not given their consent to use the photos after the end of cooperation with the institution.

The Centre adopts the principle that all suspicions and problems regarding the inappropriate dissemination of images of children should be registered and reported to the management of the institution, as well as other disturbing signals regarding a threat to the safety of children.

§ 11

Recording images of children for use by the Centre

1. In situations where the Centre records images of children for its own use, it declares that:
 - a) children and parents/legal guardians will always be informed that a given event will be recorded.
 - b) the consent of parents/legal guardians to record the event will be accepted by us in writing.
2. If the event recording is commissioned to an external person (a hired photographer or cameraman), the Centre will ensure the safety of children by:
 - a) the obligation of the person/company registering the event to comply with these guidelines,
 - b) the obligation of the person/company registering the event to wear an ID badge during the event,
 - c) preventing a situation in which the person/company registering the event will be with children without the supervision of employees,
- d) informing parents/legal guardians and children that the person/company registering the event will be present during the event and ensuring that the parents/legal guardians have given written consent to the recording of their children's image.
3. If the image of the child is only a detail of a whole such as a gathering, landscape, public event, the consent of the child's parents/legal guardians is not required.

§ 12

Recording images of children for private use

In situations where parents/guardians or participants in events organised by us record images of children for private use, we inform them at the beginning of each event that:

- a) The use, processing and publication of photos/recordings containing images of children and adults requires the consent of these persons, in the case of children – by their parents/legal guardians.
- b) Photos or recordings containing images of children should not be shared on social media or open services unless the parents/legal guardians of those children consent.
- c) Before posting a photo/video online, it is always a good idea to check your privacy settings to make sure who will be able to access your child's image.

§ 13

Recording of children's images by third parties and the media

1. If media representatives or any other person wish to record an event organized by the Center and publish the collected material, they must make such a request in advance and obtain the consent of the management. In such a situation, the Center will ensure that the parents/legal guardians have given written consent to record the image of their children. The Center obtains information about:
 - a) the name, surname and address of the person or editorial office requesting consent,
 - 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 of the compliance of the information provided with the actual state of affairs.
2. Employees are not allowed to allow media representatives and unauthorized persons to record the image of a child under their care without the written consent of the child's parent/legal guardian and without the consent of the management.
3. The Center's employees do not contact media representatives with children, do not provide the media with contact details of the children's parents/legal guardians and do not speak out in contact with media representatives about the child's or their parent/legal guardian's case. This prohibition also applies to situations when the employee is convinced that his or her statement is not being recorded in any way. In special and justified cases, the management of the institution may decide to contact the child's parents/legal guardians in order to establish a procedure for their consent to contact with the media.

§ 14

Rules in case of refusal to consent to recording the child's image

If children, parents/legal guardians have not given their consent to record their image, the Center will respect their decision. It will establish in advance with the parents/legal guardians and children how the person recording the event will be able to identify the child so as not to record their image in individual and group photos. The solution it adopts will not be exclusive for the child whose image should not be recorded.

§ 15

Storing photos and videos

We store materials containing images of children in a manner that is compliant with the law and safe for children:

1. Analogue media containing photographs and recordings are stored in a locked cabinet, and electronic media containing photographs and recordings are stored in a protected folder with access limited to persons authorized by the institution. The media will be stored for the period required by the provisions of the law on archiving and/or the period established by the institution in the personal data protection policy.
2. The Center does not store electronic materials containing images of children on unencrypted or mobile media, such as mobile phones and devices with portable memory (e.g. pendrives).
3. The Center does not consent to the use by staff members of personal recording devices (i.e. mobile phones, cameras, camcorders) to record images of children. The only equipment it uses as an institution is recording devices belonging to the institution or used on the principles approved in writing by the management..

§ 16

1. Publication by an employee of a child's image recorded in any form (photograph, audio-video recording) requires the written consent of the child's guardian. 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 the website www.youtube.com for promotional purposes).

Rules for safe use of the Internet and electronic media

§ 17

1. The Centre, providing children with access to the Internet, is obliged to take measures to protect children from accessing content that may pose a threat to their proper development; in particular, security software must be installed and updated.
2. On the premises of the Centre, children can access the Internet on designated computers located on the premises of the institution (free access), under the supervision of an employee.
3. In the case of access carried out under the supervision of an employee, this person is obliged to inform children about the principles of safe use of the Internet. The employee also ensures that children use the Internet safely during classes.

4. The institution provides constant access to educational materials regarding safe use of the Internet, on computers from which free access to the network is possible.

§ 18

1. The person responsible for the internet ensures that the institution's internet network is protected against dangerous content by installing and updating appropriate, modern software.
2. The person responsible for the internet checks at least once a month whether there is no dangerous content on computers with free access connected to the internet. If dangerous content is found, the designated person tries to determine who was using the computer at the time of its introduction.
3. The person responsible for the internet forwards information about the child who was using the computer at the time of the introduction of dangerous content to the management of the institution, which notifies the child's guardians about the incident.

§ 19

1. The network infrastructure at the institution's headquarters or on the premises of the institution where the institution operates provides access to the Internet, both for staff and children, during classes and outside of them.
2. The network is monitored so that it is possible to identify perpetrators of potential abuse.
3. Organizational solutions at the institution level are based on current security standards.
4. A person is designated to be responsible for network security in the institution. The responsibilities of this person include:
 - a) Securing the Internet network at the institution's headquarters or on the premises of the institution where the institution operates against dangerous content by installing and updating appropriate, modern software.
 - b) Updating software as needed, at least once a month.
 - c) At least once a month, checking whether there is no dangerous content on computers with free access connected to the Internet. If dangerous content is found, the designated employee tries to determine who was using the computer at the time it was introduced. The designated employee passes on information about the child who was using the computer at the time the dangerous content was introduced to the institution's management, who then organizes a meeting with the child's guardians to provide information about the incident and about the need/possibility of using specialist support, including from other organizations or services, and about ways to respond to the incident..
5. There are regulations for children using the Internet and a procedure specifying the actions to be taken when dangerous content is found on the computer.
6. In the case of access carried out under the supervision of an employee of the institution, he is obliged to inform children about the principles of safe use of the

Internet. The employee of the institution also watches over the safety of children's use of the Internet during classes.

7. Whenever possible, the person responsible for the Internet conducts regular workshops with children on safe use of the Internet.
8. The institution provides constant access to educational materials on safe use of the Internet, on computers from which free access to the network is possible.

§ 20

Online Security

1. The Centre employee must be aware of digital threats and risks resulting from applications and algorithms recording their private online activity, as well as their own online activities. This applies to liking certain sites, using dating apps where you can meet children with whom you conduct professional activities, following certain people/sites on social media and the privacy settings of the accounts they use. If the employee's profile is publicly available, children and their parents/guardians will have insight into their digital activity.
2. The employee may not establish contact with children under the Centre's care by accepting or sending invitations on social media.
3. During classes or other activities conducted by the Centre, personal electronic devices should be turned off or muted, and Bluetooth functionality should be turned off.

Monitoring

§ 21

1. The management of the institution appoints the Head of the Crisis Support Department as the person responsible for the Child Protection Policy in the institution.
2. The person referred to in the preceding point is responsible for monitoring the implementation of the Policy, for responding to signals of violations of the Policy and for proposing changes to the Policy.
3. The person referred to in the preceding point conducts a survey among the institution's staff once every 12 months to monitor the level of implementation of the Policy. The survey template is provided in Annex No. 6 to this Policy.
4. In the survey, the staff may propose changes to the Policy and indicate violations of the Policy in the institution.
5. The person referred to in paragraph 1 of this section develops the surveys completed by the staff members. On this basis, they prepare a monitoring report and determine the risk assessment and analysis Annex No. 7 and Annex No. 8 to this Policy, which they then forward to the management of the institution.
6. The management of the institution introduces the necessary changes to the Policy and announces the new wording of the Policy to the staff.

Final provisions

§22

1. The policy enters into force on the date of its announcement.
2. The announcement is made in a manner accessible to the institution's staff, in particular by posting it in a place of announcements for staff or by sending its text electronically.