



## **CHILD PROTECTION POLICY**

### **OCALENIE FOUNDATION**

#### **1. Child Protection Policy Statement**

The Ocalenie Foundation believes that every child with whom we come into contact has the right to be protected from all forms of harm, abuse, neglect, and exploitation, regardless of age, gender identity, economic and social status, ability, sexual orientation, or ethnicity. Therefore, the Foundation will not tolerate abuse and exploitation of children either by employed staff or others involved in the implementation of its activities.

The Ocalenie Foundation is committed to addressing child protection in the course of its work, through three pillars: prevention, reporting, and response. All employees and associates of the Foundation are obligated to familiarize themselves with this policy and accept it by signing a declaration. This also applies to subcontractors to whom the Foundation has outsourced any activities on its behalf. If any of them violate its guidelines the Foundation will respond appropriately to the situation, including having the right to take disciplinary action.

All children participating in the Foundation's programs and their parents are informed about the policy.

#### **2. Purpose of the Child Protection Policy**

This policy aims to protect children participating in the Foundation's activities from any harm they might suffer in the course of their cooperation with the Foundation. This includes harm resulting from:

- the conduct of those involved in activities carried out by the Foundation;
- the preparation and implementation of activities conducted by the Foundation.

The policy defines the obligations undertaken by the Foundation and informs its employees and associates about their obligations related to child protection.

### **3. Child abuse - definition**

According to D.G. Gill's definition, child abuse is any action or omission of individuals, institutions, or society as a whole, and any result of such action or failure to act that compromises the equal rights and freedoms of children and/ or interferes with their optimal development.

There are 5 types of violence against children:

Physical violence - any intentional use of physical force against a child that causes or may cause physical injury, or threatens the health, development, or dignity of the child.

Emotional violence - is a prolonged, harmful interaction not manifested in direct corporeal contact with the child, that can negatively affect the child's development. It can be in the form of action as well as an omission. It includes such behavior as verbal aggression, shouting, rejection, isolating the child, threats, developmentally inappropriate interactions with the child, etc.

Sexual abuse - any behavior that leads to a child's involvement in any activity of a sexual nature, the intention of which is to satisfy the sexual arousal of an adult. Sexual abuse includes both behavior with and without physical contact, such as exhibitionism, pornography, obscene phone calls, or verbal harassment.

Neglect - is the failure to meet a child's basic needs, both physical, such as proper nutrition, clothing, health care, and education, as well as psychological such as the sense of security, experiencing love and care.

Commercial exploitation - exploitation of a minor in work or other activities for the benefit of others and to the detriment of the child's physical or mental health, education, moral or social-emotional development.

### **4. Core policy concepts**

**Child** - any person below the age of 18 years

**Foundation** - the Ocalenie Foundation

**Foundation client** - any person, regardless of age, receiving direct assistance from the Ocalenie Foundation or participating in any of the programs conducted by it

**Person responsible for the Child Protection Policy** - a person designated by the Foundation's Board of Directors to monitor and, if necessary (with prior approval of the Board)

update the procedures and regulations contained therein. He or she constitutes the first contact for persons suspecting child abuse, and initiating individual procedures in consultation with the Board of Directors.

**Guardian of the child** - the parent or legal guardian or custodian of the child

**Foundation employee** - any person employed by the Ocalenie Foundation under an employment contract or performing tasks for it on the basis of a civil law contract or other cooperation agreements.

**Associate of the Foundation** - any person involved in the work of the Foundation: volunteer(s); intern(s); trainee(s); consultant(s); trainer(s); persons visiting the Foundation as part of exchange or cooperation programs.

**Board of Directors of the Foundation** - a team of persons listed in the National Court Register, authorized to manage the Foundation.

## **5. Prevention measures**

The Foundation takes several measures to ensure that its employees and associates do not pose a security threat to children.

All persons working or cooperating with the Foundation are checked against the Sex Offender Registry during the recruitment process. Recruited persons are also required to submit a certificate of no criminal record or pending criminal or disciplinary proceedings against them before signing a contract.

A person working or cooperating with the Foundation must not be married to a child or allow their children to marry. It is also unacceptable for the Foundation's employees/associates to employ children in work that is unsuitable for them due to their age and in case this could interfere with their education.

All persons working or cooperating with the Foundation, as well as the children participating in the Foundation's programs, are instructed in the Foundation's Child Protection Policy and know how to report any observed suspicions of child abuse.

The person in charge of the Child Protection Policy, in cooperation with the Board of Directors, once every two years, or more often if necessary, shall review the Foundation's Child Protection Policy in force and update it to ensure that it is as effective as possible. All employees and associates are informed of any changes to the policy in each case.

## **6. Rules for safe relationship between a child (the Foundation's client) and an adult (an employee or associate of the Foundation)**

Any contact of the Foundation's employees or associates with a child who is a client of the Foundation is carried out with full respect for the child's dignity, with particular regard to the child's right to protection from harm.

An employee or associate of the Foundation should never be alone with a child without the presence of a third party. In the case of meetings outside of the Foundation, these should take place in a public place, with the consent of the guardian, or at the child's home, with the guardian, or a family member designated by the guardian, present. In the case of one-on-one meetings at the Foundation, the door to the meeting room should always remain open or semi-open. This rule does not apply to meetings with a psychologist or psychotherapist. In special cases, exceptions are allowed with the approval of the supervisor, and after consultation with the person responsible for the Child Protection Policy.

An employee or associate of the Foundation shall not host a child in his or her home as part of any Foundation program. Nor should he or she give children his or her home address. Direct telephone contact with children is permissible, with the approval of the supervisor.

During trips and excursions, no employee or associate of the Foundation may sleep in a room together with the children. If necessary, this shall be done only with the supervisor's consent and with the presence of an additional adult with access to the room.

The person planning the trip should always take into account the culture and customs of the children, including their food restrictions, ensuring their free participation in all activities while respecting their cultural distinctiveness.

In addition, it is unacceptable to:

- Establish relationships of a sexual nature with children or to behave in a provocative manner toward them;
- Use physical punishment against children;
- Give/buy children alcohol, energy drinks, cigarettes, or any psychoactive substances;
- Establish inappropriate physical contact with a child, violate the child's freedom or dignity, go beyond contact that naturally arises from play, or the need to ensure the safety of the child;
- Display any behavior that degrades, embarrasses, or humiliates children;

- Maintain private contact and relationships with the child outside of the Foundation's activities, including staying in touch with him or her through social media.

## **7. Rules for safe access to the Internet as part of the Foundation's activities**

All computers and laptops that children may use as part of the Foundation's projects, both during individual and group work, as well as public networks in the foundation's offices, have locks to prevent children from accessing harmful content.

The use of equipment belonging to the Foundation by the children is always done under the supervision of an employee or associate of the foundation.

## **8. Design of Foundation activities**

The Foundation makes every effort to ensure that all its activities are planned and implemented with respect for the dignity of children and with assurance of their safety, which is why the Foundation is committed to:

- conduct a needs survey and plan projects taking into account the the provisions of the Child Protection Policy and the need for compliance by all persons involved;
- identifying the risk of child abuse at the project planning stage and incorporating strategies to address it into the project;
- to monitor the project for compliance with the provisions of the Child Protection Policy and to respond to any abuse or threats;
- to provide a safe space for all activities in which children participate in the Foundation's projects;
- to ensure that children are supervised by a trained adult at all times for the duration of the activities covered by the Foundation's projects.

## **9. Procedures for reporting suspected abuse**

In the event of suspected child abuse, any employee or associate of the Foundation is **obliged** to immediately inform their supervisor, the Board of Directors, or the person responsible for the Child Protection Policy about the situation. Notification can be made in person, or by sending an e-mail to: [ochronadziecka@ocalenie.org.pl](mailto:ochronadziecka@ocalenie.org.pl)

The e-mail is checked by the person responsible for the Child Protection Policy on a regular basis. Every report, whether verbal or written, is taken with utmost seriousness and thoroughly checked. Depending on the situation, the person responsible for the Child Protection Policy, in consultation with the Board of Directors and the person responsible for the particular program in which the child participates, initiates the appropriate procedures. Employees and associates of the Foundation involved in interventions are required to keep information related to the Foundation's clients confidential.

Any intervention begins with informing the child's guardian of the suspicion of the child's abuse, as long as it does not threaten the welfare of the child

### **10. Procedures for undertaking intervention (internal and external)**

Every report of suspected child abuse is treated by the staff of the Foundation with the utmost seriousness and is carefully reviewed to assess the threat. Depending on the reported case, the Foundation undertakes an internal intervention only or both, internal as well as external interventions.

**Internal intervention** is undertaken internally by the Foundation and occurs when:

- The child discloses an experience of abuse by an employee or associate of the Foundation;
- a suspicion of child abuse by an employee or associate of the Foundation is reported;

If the internal intervention proves to be insufficient, or the case involves a legal obligation to notify the external authorities, the Foundation undertakes an **external intervention**, which involves taking legal steps related to the notification of relevant institutions.

The Board of Directors should be immediately informed of the decision to intervene either externally or internally.

#### **I. Intervention procedures**

##### Internal intervention

Immediately upon receipt of a report of suspected child abuse, the person in charge of the Child Protection Policy, together with the manager of the program in which the child participates, and if the situation requires it with a psychologist, takes steps aimed at assessing the situation.

Depending on the assessment of the situation, a conversation with the child only, or with the child and his or her guardian, takes place in a space that is safe for him or her, in order to determine the further course of action and a plan to help and support the child adequately. A conversation is then undertaken with a staff member or associate and, if possible, with witnesses to the incident to assess the events. Each report is treated with seriousness and is investigated with due diligence.

In situations involving negative behavior that is not a crime against the child - discrimination, exclusion, ridicule, etc., upon a conversation with the employee, a memorandum of understanding is drawn up with arrangements aimed at stopping further harm. In the case of a recurring situation, the Foundation will take disciplinary measures appropriate to the situation, including termination of the contract with the employee/associate.

### External intervention

Intervention is launched mandatorily in the event of confirmed suspicion of violence or suspicion of committing a crime to the detriment of the child.

In the case of suspicion of a crime against the child, the police or prosecutor's office is immediately notified. This is a legal obligation that stems from Art. 304 of the Code of Criminal Procedure.

The child's guardians are immediately notified of the situation. A plan for the child's assistance and support adequate to his or her needs is jointly established.

## **11. Principles on personal data and image of the child protection**

The child's personal data shall be protected under the Act of May 10, 2019, on the Protection of Personal Data and the Regulation of the European Parliament and of the Council (EU) 2016/679 of April 27, 2016, on the protection of natural persons concerning the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation, "GDPR"). Details of the purposes and means of processing personal data are provided separately, in the context of each separate activity of the Ocalenie Foundation. Each employee and associate of the Foundation is obliged to maintain the secrecy of personal data and comply with the measures of protecting personal data from unauthorized access.

Recognizing the child's right to privacy and protection of personal property, the Foundation ensures the protection of the child's image by not publishing the child's image without the written consent of the child's guardian and the verbal consent of the child himself. Before

recording the child's image, the child and guardian must be informed of where the recorded image will be placed and in what context it will be used.

Any photographs taken by employees or associates of the Foundation should not include images of children in provocative poses or incomplete clothing, always showing the child as a subject never as a victim, preserving the child's right to dignity and respect. An employee or associate of the Foundation should make sure that any image or recorded story of a child does not make the child vulnerable to any form of abuse or violence.

An employee/associate of the Foundation must not allow media representatives to capture the child's image (filming, photographing) in spaces owned or rented by the Foundation without the permission of the Board of Directors and the written consent of the child's guardian.

The Foundation shall ensure that its employees and associates are trained in the principles of children's image protection.

## **12. Declaration of Acceptance of the Child Protection Policy**

I, the undersigned \_\_\_\_\_

acknowledge having read the principles of the Child Protection Policy of the Ocalenie Foundation and I hereby agree to comply with its provisions.

\_\_\_\_\_

Date

\_\_\_\_\_

Signature