# STANDARDS PROTECTION OF MINORS

# at International WR SCHOOL in Świlcza

#### Chapter I

#### **Explanation of Terms**

**§ 1** 

- 1. The School refers to International WR SCHOOL in Świlcza, operated by MPCU sp. z o.o. with its headquarters in Świlcza.
- 2. A School Employee is a person employed by the school under an employment contract or a mandate contract.
- 3. A Child is any student of the school until the age of 18.
- 4. A Child's Guardian is a person authorized to represent the child, particularly their parent or legal guardian. In the context of this document, a foster parent is also considered a guardian.
- 5. Parental Consent refers to the consent of at least one of the child's parents. However, in the absence of an agreement between the parents, they must be informed of the necessity to resolve the matter through the family court.
- 6. Child Abuse refers to the commission of a prohibited or punishable act to the detriment of the child by any person, including school employees, or the endangerment of the child's well-being, including neglect.
- 7. The Person Responsible for the Standards for the Protection of Minors is a school employee appointed by the school director to oversee the implementation of the Standards for the Protection of Minors at the institution.
- 8. A Child's Personal Data refers to any information enabling the identification of the child.
- 9. The Intervention Team is a group consisting of a pedagogue, psychologist, homeroom teacher, and selected educators cooperating to assist a child affected by abuse.

#### Chapter II

#### **Identifying and Responding to Risk Factors of Child Abuse**

§ 2

- 1. School employees possess knowledge and, as part of their duties, pay attention to risk factors and symptoms of child abuse.
- 2. Upon identifying risk factors, school employees initiate a conversation with the child's parents or legal guardians, providing information about available support options and encouraging them to seek help.
- 3. School employees monitor the child's situation and well-being.
- 4. School employees are familiar with the rules of safe interactions between school employees and children, children with other children, and children with third parties or parents, as established by the school. These rules are attached as Annex 1 to these Standards.
- 5. Recruitment of school staff follows the principles of safe personnel recruitment. These principles are outlined in Annex 2, and the declaration of no criminal record and commitment to child protection standards is provided in Annex 3 of these Standards.
- 6. When procedures involve a child with disabilities or special educational needs, the school provides support from specialists as appropriate to the child's dysfunction.

#### **Chapter III**

#### **Intervention Procedures in Cases of Child Abuse**

§ 3

When a school employee receives information indicating that a child is being abused, they must prepare an official note and forward the information to the person responsible for the Standards for the Protection of Minors, a pedagogue, psychologist, or the school director.

#### § 4

- 1. The person responsible for the Standards for the Protection of Minors, a pedagogue, psychologist, or school director, in the presence of the homeroom teacher or another educator, summons the parents or guardians of the child suspected of being abused and informs them of the suspicion.
- 2. The responsible person, pedagogue, psychologist, or director prepares a description of the child's school and family situation based on conversations with the child, teachers, homeroom teacher, and parents, as well as a plan to assist the child.
- 3. The child assistance plan should include recommendations regarding:
  a. Actions by the school to ensure the child's safety, including reporting suspected abuse to the appropriate institution if necessary;
  - b. Support to be offered by the school;
  - c. Referral of the child to a specialized facility or institution for child assistance if needed.

#### § 5

- 1. In more complex cases (e.g., sexual abuse or severe physical and psychological mistreatment), the director establishes an intervention team, including a pedagogue/psychologist, the child's homeroom teacher, the director, and other staff members aware of the abuse or the child's situation (hereinafter: intervention team).
- 2. The intervention team drafts a child assistance plan meeting the requirements of these Standards, based on the description prepared by the director and information provided by team members.
- 3. If the suspicion of abuse is reported by the child's parents or guardians, forming an intervention team is mandatory. The intervention team calls the child's guardians for an explanatory meeting and may recommend an assessment of the reported suspicion by an external, impartial institution. A protocol is prepared for this meeting.

#### § 6

- 1. The child assistance plan is presented to the parents or guardians with a recommendation for cooperation in its implementation.
- 2. The class homeroom teacher monitors the progress of the plan's implementation and its impact on the child.
- 3. The school director (or their delegate) informs the parents or guardians about the school's obligation to report suspected child abuse to the relevant institution (prosecutor/police, family court, social welfare center, or the head of the interdisciplinary team—"Blue Card" procedure—depending on the type of abuse diagnosed and the corresponding intervention).

- 4. After informing the guardians, the school director files a report of suspected crime with the prosecutor/police or a request for family situation review with the District Court, Family and Juvenile Division, Social Welfare Center, or sends the "Blue Card A" form to the head of the interdisciplinary team.
- 5. Further proceedings fall under the competence of the institutions mentioned above.
- 6. If the abuse suspicion reported by the child's guardians is not confirmed, they must be informed of this fact in writing.

§ 7

- 1. An intervention card is prepared during the intervention process, following the template in Annex 4 of these Standards. The card is included in the child's personal records.
- 2. All school staff and others who, in the course of their duties, obtain information about child abuse or related issues are required to keep such information confidential, except when sharing it with authorized institutions during intervention actions.

#### **Chapter IV**

# Rules for the Protection of Personal Data and the Child's Image § 8

- 1. A child's personal data is protected in accordance with applicable legal provisions.
- 2. School employees are obligated to keep personal data they process confidential and to maintain the confidentiality of the methods used to secure personal data against unauthorized access.
- 3. A child's personal data may be disclosed only to individuals and entities authorized under separate regulations.
- 4. School employees are authorized to process a child's personal data and share it within an interdisciplinary team established under the Act of July 29, 2005, on Counteracting Domestic Violence, and the Act of March 9, 2023, amending the Act on Counteracting Domestic Violence and certain other acts.
- 5. School employees may use information about a child for training or educational purposes only if the child remains anonymous and in a manner that prevents identification.

§ 9

- 1. School employees do not provide information about a child or their guardian to media representatives.
- 2. In exceptional and justified cases, a school employee may contact a child's parent/guardian to request consent to share their contact information with media representatives. If consent is granted, the employee provides the media with the guardian's contact details.
- 3. School employees do not connect media representatives with children.
- 4. School employees are prohibited from discussing matters concerning a child or their parent/guardian with media representatives. This prohibition also applies when employees believe their statements are not being recorded in any way.
- 5. In exceptional and justified cases, school employees may comment on matters concerning a child or their parent/guardian, but only with the written consent of the child's parent/guardian.

- 1. To produce media content, selected school spaces may be made available to media representatives. The decision to do so is made by the school director.
- 2. Upon making such a decision, the school director instructs the school office to prepare the selected space for the purpose of producing media content.
- 3. School employees must not allow media representatives to record a child's image (e.g., filming, photographing, or recording their voice) on school premises without written consent from the child's parent or legal guardian.
- 4. Parents/guardians provide written consent for the recording of a child's image when submitting enrollment documents to the school.
- 5. If a child's image appears as an incidental part of a larger whole, such as a crowd, landscape, or public event, parental consent for recording the child's image is not required.

#### § 11

- 1. A child's image may be recorded and shared by homeroom teachers, field trip supervisors, or a teacher designated by the director responsible for the school's media image, provided the parents/guardians have given consent.
- 2. Efforts should be made to avoid identifying children in photos/videos by their full name.
- 3. It is prohibited to disclose any sensitive information about a child (e.g., health, financial situation, or legal status).
- 4. Sharing photos that are degrading, humiliating, or portray the child in a negative context is strictly forbidden.
- 5. If media representatives or other individuals wish to record an event organized by the school and publish the material, they must submit a prior request and obtain the school director's consent.
- 6. Parents/guardians may record and share the image of only their own children.
- 7. Students are prohibited from sharing the images of other students.

#### Chapter VI

#### **Rules for Children's Internet Access**

#### **§ 12**

- 1. The school, when providing students with Internet access, is required to take measures to protect students from exposure to content that may pose a threat to their proper development. This includes installing and updating security software.
- 2. On school premises, children may access the Internet only under the supervision of a school employee during IT classes or other activities.
- 3. When supervising children's Internet access, school employees are required to educate them on safe Internet usage. Employees must also oversee children's Internet safety during lessons.

#### § 13

1. A designated school employee must check at least once a quarter whether any harmful content is present on school computers with Internet access. If such content is found, they must determine who accessed the computer when the content was introduced.

- 2. Information about the child who accessed the harmful content is passed to the school pedagogue by the designated employee.
- 3. The pedagogue conducts a discussion with the child in question about Internet safety.
- 4. If the discussion reveals that the child is being harmed, actions described in these Standards are implemented.

#### **Chapter VII**

## Monitoring the Implementation of the Standards § 14

- 1. The school director appoints a person responsible for the Standards for the Protection of Minors at the school.
- 2. The appointed person is responsible for monitoring the implementation of the Standards, responding to violations, and suggesting amendments to the Standards.
- 3. The school director introduces necessary changes to the Standards and informs school employees of the updated version.

#### **Chapter VIII**

# Scope of Responsibilities and Training for School Employees on the Standards § 15

- 1. The person responsible for preparing employees to apply the Standards is the school director.
- 2. For employees hired after the Standards for the Protection of Minors take effect, the school director will organize internal training to inform teachers about the implementation of the Standards in the school. Separate training will be conducted for other employees.
- 3. Confirmations of training for teaching and non-teaching staff are included in the relevant meeting records.
- 4. Responsibility for preparing new employees to follow the Standards is assigned as follows: a. For teaching staff the school director;
  - b. For administrative and support staff the school secretary.
- 5. Every employee confirms their completion of training on the Standards for the Protection of Minors with a signature. The signed declaration is stored in the school's documentation.

#### **Chapter IX**

# Rules and Methods for Providing Standards to Parents, Guardians, and Children § 16

- 1. Documentation comprising the Standards for the Protection of Minors is made available to children and parents/guardians on the school's website.
- 2. Parents/guardians and children are obligated to familiarize themselves with the Standards for the Protection of Minors.
- 3. The Standards for the Protection of Minors are also available in written form at the school's office.

#### Chapter X

# Methods for Documenting and Storing Reported or Identified Incidents Threatening the Wellbeing of Minors

§ 17

- 1. Every reported or identified incident or event threatening a child's well-being, of which a school employee is aware, must be recorded in the Register of Incidents Threatening the Well-being of Minors. A template for this register is provided as Annex 5 to these procedures.
- 2. Documentation is stored in the school director's office in a locked cabinet.

#### Chapter XI

#### Final Provisions § 18

- 1. This document takes effect upon announcement.
- 2. The announcement is made in a manner accessible to school employees, particularly through posting in a designated staff announcement area, emailing the text, and publishing it on the school's website.

#### **Annex 1 - Rules for Safe Relationships**

#### I. Rules for Safe Relationships Between School Employees and Children

The guiding principle for all actions undertaken by school employees is to act in the best interests of the child. Employees treat children with respect, acknowledging their dignity and needs. Any form of violence against children is strictly prohibited. Employees act in compliance with applicable laws, internal school regulations, and within their professional competencies. These rules apply to all staff, interns, and volunteers.

School employees are required to maintain professional relationships with children.

#### Communication with Children:

- Communicate with patience and respect.
- Listen attentively to children and provide responses appropriate to their age and situation.
- Avoid shaming, belittling, ignoring, or offending a child.
- Do not disclose sensitive information about a child to unauthorized persons, including other children. This includes their image, family circumstances, economic situation, medical, caregiving, or legal matters.
- Inform the child about decisions affecting them and consider their expectations when possible.
- Respect the child's right to privacy. If confidentiality must be breached to protect the child, explain the situation to the child as soon as possible.

- If you need to speak to a child in private, leave the door ajar and ensure visibility to others. Alternatively, invite a second employee to be present.
- Do not engage in inappropriate behavior in the presence of children, including using vulgar language, gestures, jokes, offensive remarks, or references to sexual activities or attractiveness. Avoid exploiting power dynamics or physical superiority to intimidate or coerce.
- Reassure children that they can report discomfort caused by a situation, behavior, or words to you or the school pedagogue and expect appropriate action or support.

#### **Interactions with Children:**

- Appreciate and respect children's contributions to activities, actively engage them, and treat them equally regardless of gender, abilities/disabilities, social status, ethnicity, culture, or religion.
- Avoid favoritism.
- Do not establish romantic or sexual relationships with children or make inappropriate proposals. This includes sexual comments, jokes, gestures, or sharing explicit materials.
- Do not record a child's image (e.g., video, audio, photos) for personal use. Third parties should not record children's images unless the director is informed, consent is granted, and parental/legal guardian permission is obtained.
- Do not offer children alcohol, tobacco products, or illegal substances, nor consume these in their presence.
- Avoid accepting gifts or money from children or their parents/guardians. Do not engage in relationships that may create dependency or lead to accusations of unequal treatment or personal gain. This does not include occasional gifts, such as flowers or small tokens during holidays, initiated by the child or their parent/guardian.
- Any risky situations, such as infatuation by or with a child, must be reported to the administration. React firmly yet tactfully to preserve the dignity of those involved.

#### **Physical Contact with Children:**

- Any violent actions towards children are unacceptable. However, there are situations where physical contact with a child may be appropriate and align with the principles of safe interaction. Such contact must meet the child's needs at that moment, considering their age, developmental stage, gender, cultural, and situational context. It is impossible to establish universal appropriateness for every physical interaction, as what is suitable for one child may be inappropriate for another. Always rely on professional judgment, observing and noting the child's reactions, seeking their consent for physical contact (e.g., a hug), and remaining aware that even with good intentions, such interactions may be misinterpreted by the child or others.
- You must not hit, push, shove, or in any way violate a child's physical integrity.
- Never touch a child in a manner that could be deemed inappropriate or indecent.
- Always be prepared to explain your actions.
- Avoid activities such as play-fighting with children or engaging in rough physical games.
- Exercise particular caution with children who have experienced abuse or neglect, including sexual, physical, or emotional harm. Such experiences may lead children to seek

- inappropriate or excessive physical contact with adults. In these situations, respond sensitively but firmly and help the child understand the importance of personal boundaries.
- Physical contact with a child must never be covert or hidden, involve any form of reward, or stem from a power dynamic. If you witness any of the above behaviors or situations involving other adults or children, report them immediately to the designated authority or follow the intervention procedures.
- In situations requiring care or hygiene activities, limit physical contact with the child to what is strictly necessary. This applies especially to assisting with dressing, undressing, feeding, washing, or using the toilet.

#### **Interactions Outside of Work Hours**

- As a rule, contact with children should occur only during work hours and for educational or developmental purposes.
- You must not invite children to your home or meet them outside of work hours. This includes communication via private channels (personal phone, email, messaging apps, or social media profiles).
- If necessary, appropriate channels for communication with children and their parents/guardians outside work hours include official school tools (e.g., work email, official phone, LIBRUS, etc.).
- If an off-hours meeting with children is necessary, inform the administration, and ensure parents/legal guardians consent to such contact.
- Maintaining personal or familial relationships (if the child or their parents/guardians are close to the staff member) requires strict confidentiality regarding all information about other children, their parents, and guardians.

#### **Online Safety:**

- Be aware of digital risks and the potential consequences of your private online activity being tracked by applications, algorithms, or others. This includes "liking" certain pages, using dating apps where you might encounter students, following specific accounts or pages on social media, and adjusting privacy settings on your profiles. If your profile is publicly accessible, students and their parents/guardians may have visibility into your digital activity.
- Do not initiate contact with students through social media by sending friend requests or messages.

#### II. Rules for Safe Relationships Between Children

- 1. Children have the right to live and learn in a safe environment.
- 2. Teachers and school staff protect children and ensure their safety.
- 3. Children must follow the rules and behavioral norms established in the school's Statute.
- 4. Children must respect the rights of others, regardless of differences in ethnicity, geography, nationality, religion, economic status, family characteristics, age, physical attributes, or disabilities. Discrimination based on any differences is not permitted.
- 5. Children's behavior and actions towards others must not violate their sense of dignity or self-worth.

- 6. Interactions between children must reflect high standards of personal culture, such as using polite phrases like "please," "thank you," and "sorry," showing courtesy, kindness, and refraining from vulgar language.
- 7. Children must accept and respect one another.
- 8. Children should demonstrate understanding for the difficulties and problems of their peers and offer help. They must not mock, ridicule, or criticize their weaknesses.
- 9. Aggression and violence—whether physical, verbal, or psychological—must not be accepted or justified under any circumstances. Children must not use any form of aggression or violence against their peers.
- 10. If a child witnesses another child exhibiting any form of aggression or violence, they must respond by helping the victim, seeking help from an adult, or reporting the incident.
- 11. All children must know how to behave in situations that threaten their safety or the safety of others. Teachers provide this information during lessons.
- 12. If a child becomes a victim of aggression or violence, they can seek help at school under the procedures outlined in these Standards.

#### **Prohibited Behaviors in School:**

- 1. Aggression and Violence Against Others:
  - a. Physical aggression and violence, such as:
    - Hitting, pushing, shoving, kicking, spitting, pinching, or extortion.
    - Exploiting dominance over others.
    - Physical harassment.
    - Forcing another person to engage in inappropriate actions.
    - Throwing objects at someone.
      - b. Verbal aggression and violence, such as:
    - Insults or name-calling.
    - Mocking, teasing, or ridiculing the victim.
    - Directly offending the victim.
    - Spreading rumors or offensive jokes, mimicking the victim.
    - Threatening the victim.
      - c. Psychological aggression and violence, such as:
    - Humiliation.
    - Exclusion, isolation, or silent treatment.
    - Writing or drawing offensive content.
    - Making vulgar gestures.
    - Destroying or taking the victim's belongings, threatening or blackmailing them.
- 2. Creating dangerous situations at school, such as bringing sharp tools or other hazardous items.
- 3. Leaving the classroom without permission or leaving school grounds unauthorized.
- 4. Deliberately disregarding safety rules during school activities.
- 5. Misbehavior during field trips or excursions outside school grounds.
- 6. Deliberately endangering health or life.

- 7. Using inappropriate language towards peers or others at school.
- 8. Using vulgarities.
- 9. Deliberately damaging or disrespecting the property of others or the school.
- 10. Theft or appropriation of belongings from peers, others, or the school.
- 11. Extorting belongings from peers.
- 12. Exploiting peers in exchange for material benefits.
- 13. Resolving conflicts with violence or participating in fights.
- 14. Failing to address inappropriate behavior among peers (e.g., hitting, name-calling, teasing).
- 15. Arrogant or rude behavior towards peers or others, including the use of vulgarities.
- 16. Lying or deceiving peers or others.
  - 17. Using private or school telecommunication devices to engage in any form of aggression or violence.

#### III. Rules for Safe Relationships Between Children and Third Parties/Parents on School Premises

- 1. While on school grounds, children must treat everyone with respect, use polite language, and behave courteously.
- 2. A third party/parent on school premises (e.g., playground, hallway, classroom, or surrounding area) must not engage in conversations with children, yell at them, insult them, invade their personal space or dignity, or take any vigilante actions against the child.
- 3. A third party/parent who needs clarification about a conflict that occurred on school grounds should report the issue to the school director or pedagogue, who will schedule a meeting with the child's parent/guardian, potentially in the presence of the child, with the legal guardian's consent.
- 4. Any concerning interactions with third parties/parents must be reported immediately to the homeroom teacher or another adult school employee.

#### **Annex 2 – Principles of Safe Recruitment of Personnel**

#### Safe Recruitment Principles at International WR SCHOOL in Świlcza

- 1. Get to know the candidate's personal data that will allow you to best assess their qualifications, including their attitude toward the values shared by the school.
- 2. The school must ensure that the individuals it employs (including those working under mandate agreements, as well as volunteers/interns) have the necessary qualifications to work with children and are safe for them. To verify this, and to assess the individual's attitude towards children and their commitment to respecting children's rights, the institution may require data (including documents) regarding:
  - a. Education;
  - b. Professional qualifications;
  - c. The candidate's employment history;
  - d. A certificate regarding criminal records.
- 3. In every case, the school must have data that allows for the identification of the individual being employed, regardless of the type of employment. Therefore, the institution should know:
  - a. Full name;
  - b. Date of birth;
  - c. Contact details of the person being employed.
- 4. The institution may request that the candidate provide references from previous employers or contact details of someone who can provide references. The provision of references or contact details of former employers must be done with the candidate's consent. The failure to provide such information should not result in negative consequences, such as denial of employment, solely based on this reason, in accordance with applicable laws.
- 5. The school is required to demand a certificate from the National Criminal Register (KRK) from the person being employed. The KRK certificate can only be requested if the law explicitly requires that employees in certain professions or positions must have a clean criminal record. The requirement for a clean criminal record applies, among others, to local government employees and teachers, including teachers working in both public and non-public institutions.
- 6. If it is impossible to provide the certificate, the candidate should be asked to submit a declaration regarding their criminal record and any ongoing preparatory, judicial, or disciplinary proceedings.
- 7. If the individual holds citizenship other than Polish, they should also provide information from the criminal register of their country of citizenship for professional purposes related to contact with children, or information from their country's criminal register, if that country's law does not allow issuing such information for the above-mentioned purposes.

#### **Annex 3 – Declaration of No Criminal Record**

# Declaration of No Criminal Record and Commitment to Comply with the Standards

I,
[Full Name, PESEL Number]
hereby declare that I have not been convicted of any crime related to sexual freedom, morality, or crimes involving violence against minors, and that no criminal or disciplinary proceedings are currently being conducted against me in this regard.
I acknowledge my criminal liability for providing false information in this declaration.
Furthermore, I declare that I have read and understood the <b>Standards for the Protection of Minors</b> at <b>International WR SCHOOL in Świlcza</b> and I commit to adhering to them.
Świlcza, (Employee's Signature)

#### **INTERVENTION CARD**

2.	Reason for Intervention (Form of Abuse)			
3.	Person Reporting the Suspected Abuse			
4.	Description of Actions Taken by the Pedagogue	Date:	Action:	
5.	Meetings with the Child's Guardians	Date:	Meeting describtion:	
6.	Form of Intervention (please underline the appropriate one):	[ ] Referral for family situation review [ ] Report of suspected criminal activity [ ] Other intervention (please specify):		
7.	Details of Intervention (Name of the authority to which the intervention was reported) and Date of Intervention			
8.	Results of the Intervention (Actions taken by the justice authorities if information was received; actions taken by the institution; actions taken by the parents)	Date:	Action:	

### Register of Incidents Threatening the Well-being of a Minor

No.	Description of Incident	Date of Incident	Action s Taken	Was there External Intervention ?	Description of Actions Taken by External Authorities	Signature of the Person Accepting the Report