



Child Protection Policy of the Polish Robert Schuman Foundation

Polska Fundacja im. Roberta Schumana
www.schuman.pl, poczta@schuman.pl
Al. Ujazdowskie 37/5, 00-540 Warszawa
T. +48 571 487 359

The child protection policy has been prepared in line with the Child Safeguarding Standards introduced by the Act of 28 July 2023 amending the Act - Family and Guardianship Code and certain other acts (the so-called Protection of Minors Act) and based on the document "The International Child Safeguarding Standards and how to implement them" [accessed 25.06.2024], the UN Convention on the Rights of the Child, and the knowledge and materials of other civil society organisations, most notably those involved in the implementation of children's rights.



STANDARD I. POLICY

Part of the Schuman Foundation's activities are directed towards children and aim to develop them as conscious, socially and civically active Europeans. The Foundation carries out activities for children, usually in cooperation with educational institutions. The Foundation's team - staff, associates and volunteers - makes every effort to create a friendly environment for children's development, so that its activities are safe for children and do not cause them harm or expose them to harm.

The purpose of this policy is to sensitise all staff, associates and volunteers to the importance of child protection activities, to identify actions to keep children safe and to develop the Foundation's work culture based on children's rights.

§ 1.

Explanation of terms

1. The **Policy** is understood to mean the Child Protection Policy applied in the course of the activities carried out by the employees and collaborators of the Polish Robert Schuman Foundation.
2. **The Foundation** and **PFRS** shall be understood to mean the Polish Robert Schuman Foundation.
3. A **child**, under Polish law, is any person up to the age of 18.
4. An **employee** of the Foundation is a person employed by the Foundation under an employment contract.
5. An **associate** of the Foundation is a person who is employed under a civil law contract or who performs unpaid work for the Foundation as part of an internship programme on the basis of an internship agreement, a volunteer agreement, an apprenticeship agreement or another cooperation agreement.
6. The **Foundation Team** is understood to be the staff and associates of the Foundation.



7. The **Co-ordinator** is the person responsible for the Child Protection Policy, the Management Board's nominated member of staff who oversees its implementation at PFRS.
8. **Harm** is any intentional or unintentional act, or failure to act, by an individual, an institution or society as a whole, and any result of such action or inaction, which violates the equal rights and freedoms of children and/or interferes with their optimal development.

There are 4 basic forms of **harm**:

- **Physical violence** against a child is violence whereby a child suffers actual physical harm or is potentially threatened with such harm. This harm occurs as a result of an action or inaction on the part of a parent or other person responsible for the child, or on the part of someone the child trusts or has authority over. Physical violence against a child may be a repeated or one-off act.
- **Psychological child abuse** is a chronic, non-physical, harmful interaction between a child and caregiver, involving both actions and inactions. It includes, but is not limited to: emotional unavailability, emotional neglect, a relationship with the child based on hostility, blaming, denigration, rejection, developmentally inappropriate or inconsistent interactions with the child, failure to recognise or acknowledge the child's individuality and psychological boundaries between parent and child.
- **Sexual exploitation** of a child is the involvement of a child in sexual activity that the child is not capable of fully understanding and giving informed consent to, and/or to which the child is not developmentally mature and cannot consent in a legally valid manner, and/or which is incompatible with the legal or moral norms of a given society. 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, authority.



- **Child neglect** is the chronic or incidental failure to meet a child's basic physical and psychological needs and/or to respect his or her basic rights, resulting in disruption to his or her health and/or developmental difficulties. Neglect occurs in a child's relationship with a person who has a duty of care, nurture, concern and protection to the child.

STANDARD II. STAFF

§ 2.

The Foundation's organisational culture in the context of the Child Protection Policy

1. The Foundation has high ethical and moral standards which are required of the members of the Foundation Team.
2. The team's organisational culture is based on mutual respect, dialogue, shared values and belief in the Foundation's mission.
3. Members of the Foundation Team are required to know the rights of the child.
4. The entire Foundation Team works to protect children from harm.
5. Educational activities for children are prepared with the participation of people experienced in working with children and are adapted to the developmental level of children.
6. Child safety provisions are included in the contracts signed by the Foundation for child-directed activities.
7. The Foundation's partners, where there are volunteers working with the Foundation, are required to train volunteers on the safety rules for children in their establishment.



8. Recruitment of employees and associates of the Foundation shall be carried out in accordance with the obligations for safe recruitment of employees imposed on employers and persons with whom an employment relationship is to be established or who are to be permitted to engage in the activities specified in Article 21, paragraph 1. of the Law of July 28, 2023, amending the Family and Guardianship Code and other laws, in accordance with the provisions of Article 21, paragraphs 1-11. *ibid.*
9. The procedures listed in para. 8 are undertaken for the recruitment of employees and associates whose responsibilities fall within level 1. and level 2. according to the list of positions in Appendix 8 selected on the basis of risk analysis.
10. When recruiting members of the Foundation's Team whose responsibilities fall within level 1. according to the list of positions in Appendix 8 selected on the basis of the risk analysis, the job/volunteer advertisement includes a description of the form of work with children and the competencies required for this.
11. In the case of those referred to in para. 10, their competence in this area, as well as their attitude to children and the values on which the candidate bases cooperation with children, are analyzed - through the information contained in the recruitment form and during the interview.
12. The information obtained in accordance with the provisions of Art.21, Paragraphs 1-11. of the Law of July 28, 2023, amending the of the Family and Guardianship Code and other laws, the employer shall record it in hard copy and attach it to the employee's personnel file or documentation on the person admitted to activities related to the related to the Foundation.
13. The Management Board, in order to identify the employee, must have from the candidate the identifier of information issued from the Polish register if accessing the register online, or his/her data: name, date of birth, PESEL, family name, father's name, mother's name, contact details of the candidate.



14. New members of the Foundation Team receive this policy on commencement, including the Division of Responsibilities for Implementation of the Child Protection Policy attached as Appendix 4 of the Policy.
15. All members of the Team shall make a written declaration that they have read the Policy. The statement is attached as Appendix 3 of the Policy
16. As a supplement to the standards of the Child Protection Policy, a simplified version of the Child Protection Policy directed to children is also published. It constitutes Appendix 9 to the Policy.
17. For the purpose of updating the Child Protection Policy, a risk analysis is carried out, for review upon request by controlling entities.
18. A list of positions is developed based on the risk analysis. It constitutes Appendix 8 to the Policy.



STANDARD III. PROCEDURES

§ 3.

Responding to risk factors for child abuse

1. Staff are aware of, and apply, the Foundation Team and Child-to-Child Safe Relationship Rules and Requirements set out in the Foundation. The principles and requirements are attached as Appendix 1 and 2 to the Policy.
2. Any information about suspected child abuse is taken seriously and investigated, whether it comes from a child/carer/professional and whether it concerns suspected abuse by another child, a child's carer, a professional or a member of the Foundation Team.
3. In a situation of child abuse by a member of the Foundation Team, a witness to the incident is obliged to draw the attention of such a person and report the incident to the Management Board of the Foundation.
4. Child abuse situations observed by the Foundation Team are reported to the Management Board of the Foundation. The Foundation Board intervenes with the relevant persons/services.
5. In the event of an imminent threat to a child's life or health, the member of the Foundation Team who has obtained such information shall intervene immediately by telephoning the relevant police unit immediately to report the imminent threat or breach to the child's life and health..
6. All intervention activities are documented and communicated to the Policy Coordinator.
7. The person reporting child abuse shall prepare, in cooperation with the Coordinator, a service memo in the form of an intervention card, which is attached as Appendix 5 to the Policy.



§4.

Rules on the protection of the child's image

1. The Foundation ensures standards for the protection of children's personal data in accordance with current data protection legislation.
2. Materials must not show children in an unfavourable light.
3. Recording and sharing of the image of a child who is under 16 years of age in any form (photography, audio-video recording) by a member of the Foundation Team or any other person may not take place against the child's will and requires the prior written consent of the child's legal guardian.
4. A child who is 16 years of age or older has the right to independently consent to the recording and sharing of his/her image. The consent is given in writing.
5. In order to obtain the consent referred to in paragraph 3, the Foundation Team must contact the child's guardian and agree how to obtain consent.
6. If the image of the child is only a detail of a whole, such as a gathering, a landscape, a public event, the consent of the parent or legal guardian is not required for the recording of the child's image.
7. The written consent referred to in paragraph 3 and 4 should include information on where the registered image will be placed and for what purpose it will be used. The template of the consent form for the use of the image is attached as Appendix 6 to the Policy.



STANDARD IV. MONITORING

§ 5.

Policy implementation and monitoring

1. The Child Protection Policy of the Polish Robert Schuman Foundation enters into force upon publication of its full version by the Management Board of PFRS in a manner accessible to all employees/co-workers of PFRS and upon posting on the Foundation's website: www.schuman.pl in a manner accessible to parents or legal or actual guardians and their children.
2. The PFRS Board appoints a Coordinator responsible for coordinating the implementation of and compliance with the provisions of the Child Protection Policy.
A list of the Coordinator's responsibilities in this regard is available in Appendix 4 of the Policy.
3. The Coordinator of the Child Protection Policy conducts monitoring of the application of the provisions of the Policy in the form of a survey and consultation at least once every 2 years. The monitoring survey is attached as Appendix 7 to the Policy.
4. Whenever changes to the Policy are made, they must be announced to all employees, associates and volunteers of PFRS.
5. Reports of incidents that violate the Policy, including those that put the child at risk, should be directed to the Management Board of the Foundation and the Coordinator.
6. All employees, associates and volunteers shall make a written declaration that they have read the Policy. The statement is attached as Appendix 3 of the Policy.
7. The policy is approved and signed by the Management Board or the Legal Representative of PFRS.



Appendix 1

PRINCIPLES AND REQUIREMENTS FOR A SAFE RELATIONSHIP FOUNDATION TEAM – CHILD

I. Activities with children

1. Children's contributions to activities should be valued and respected, actively involved and treated equally regardless of their gender, sexual orientation, ability/disability, social, ethnic, cultural, religious status and worldview.
2. Favouritism towards children must be avoided.
3. It is forbidden to enter into a relationship of an inappropriate nature with a child. This includes sexual comments, jokes, gestures and sharing erotic and pornographic content with children in whatever form
4. It is not permitted to capture a child's image (filming, voice recording, photographing) for private use
5. Alcohol, tobacco products or illegal substances must not be offered to children or used in the presence of children.
6. It is not allowed to accept money or gifts from the child or the child's guardians expressing some kind of dependence or financial benefit. This does not apply to voluntary, traditional, occasional gifts related, for example, to holidays.
7. It is forbidden to establish relationships with children beyond the scope of the implementation of activities under the job description.



II. Physical contact with children

1. Under the terms of this chapter, only persons whose responsibilities fall within level 1 according to the list of positions in Appendix 8 selected on the basis of risk analysis may have physical contact with children.
2. Acceptable physical contact must be naturally related to play, helping the child with hygiene activities, the need to keep the child safe, the need to reassure the child: it responds to the child's needs at the time, takes into account the child's age, developmental stage, gender, cultural and situational context.
3. Physical contact (e.g., hugging, assisting with the toilet) is always done with the child's consent. However, it is not possible to determine the universal appropriateness of any such physical contact, as behavior appropriate to one child may be inappropriate to another. Professional judgment should always be used, listening, observing and noting the child's reaction, remaining aware that even with good intentions, such contact may be misinterpreted by the child or third parties.
4. Physical contact with the child must never be implicit or hidden, involve any gratification or be the result of a power relationship.
5. In situations involving grooming and hygiene activities with the child, non-essential physical contact with the child must be avoided.
6. Any violent action against a child is unacceptable.
7. It is not permitted to hit, poke, push or in any way violate the physical integrity of a child.
8. A child must not be touched in a way that may be considered indecent or inappropriate.
9. Do not engage in activities such as pretend fighting with children or violent physical play.
10. You should always be prepared to explain your actions.



III. Principles for organising support for children with disabilities and special needs

1. The Foundation makes every effort to ensure that children with disabilities and special needs are able to participate fully in the Foundation's activities.
2. The Foundation team ensures that these children are not discriminated against in any form by anyone.

IV. Safety online

1. It is forbidden to make contact with children through electronic communications beyond the scope of the performance of activities arising from official duties.
2. When the Foundation Team organises activities involving children's use of the Internet, the Team is obliged to take measures to protect children from accessing content that may pose a risk to their proper development.



Appendix 2

PRINCIPLES FOR SAFE CHILD-CHILD RELATIONSHIPS

1. PFRS respects the law as well as the obligations under the UN Universal Declaration of Human Rights and the Convention on the Rights of the Child adopted by the UN General Assembly.
2. A properly organised educational process involves the formation of mutual relationships between children.
3. Relationships between children are formed in a way that is adapted to the child's needs and perceptual abilities.
4. Behaviour that is not allowed in relations between children is in particular: physical violence, verbal aggression, destruction of other people's property, extortion, blackmail.



Appendix 3

Warsaw, on.....

Name:

place of work:

position:

STATEMENT

I, the undersigned, declare that I have read the "Child Protection Policy" of the Polish Robert Schuman Foundation and undertake to abide by it.

.....

signature



Appendix 4

Division of responsibilities for implementation Child Protection Policy

PFRS Board:

- Approves and publishes the Policy, approves amendments.
- Resolves bindingly any doubts regarding the interpretation of the provisions of the Policy.
- Appoints Policy Coordinator.
- Initiates proceedings in the event of suspected child abuse by a PFRS employee/co-worker.

Child Protection Policy Coordinator:

- Coordinates the preparation and delivery of initial and refresher training on the Policy.
- Keeps a list of frequently asked questions.
- Conducts monitoring of the application of the provisions of the Policy in the form of a survey and consultation at least once every 2 years by:
 - a) Conduct a survey once every 2 years to check the operation and relevance of the provisions of the Child Protection Policy and the level of awareness of these among members of the Foundation Team;
 - b) Carry out an internal audit once every 2 years of the level of development of the standards introduced by the Policy using tools developed by Keeping Children Safe (e.g. Keeping Children Safe self-assessment tool and the self-assessment web),



- Once every two years, or more often, if necessary, make proposals to the Board for changes to the Policy based on the results of the surveys. - Clarifies, in consultation with the Board, any doubts regarding the application of the Policy.
- Explains, in consultation with the Management Board, violations of the provisions of the Policy.
- Stores intervention cards.

Human Resources Department:

- Provides each new employee with the Child Protection Policy for familiarisation and collects in the employee file, in addition to other documents indicated by law, statements of familiarity with the aforementioned documents.

Foundation team:

- They are familiar with and comply with the provisions of this Policy.
- Before working with children, they shall make the appropriate declarations to the employer in accordance with the applicable legislation.
- When child abuse is suspected, they report the matter to the Policy Coordinator.
- Raise concerns about the interpretation of the provisions of this Policy with the Policy Coordinator.
- Report violations of the Policy to the Policy Coordinator.



Appendix 5

INTERVENTION CARD/SERVICE MEMO

Name and surname of the child		
Notifying person		
I hereby give notice of: (circle appropriate)		
suspected abuse		abuse
Cause of intervention (form of abuse)		
Description of actions taken by:		
1. Notifying person		
2. Policy Coordinator		
3. Board		
Form of intervention undertaken (circle appropriate)		
1. notification of suspected crime, 2. informing the teacher/guardian, 3. informing the parent, 4. other type of intervention (what type?)		
Intervention data	Date	Name of the authority to which the intervention was reported
Signature of the notifying person		Signature of the person receiving the notice



Appendix 6

CONSENT TO USE THE CHILD'S IMAGE

.....
(name and surname of parent/legal guardian/child over 16 years old)

I hereby declare that, pursuant to Article 81 (1) of the Act of February 4, 1994 on Copyright and Related Rights (i.e. Journal of Laws of 2019, item 1231) I authorise the registration of my image/the image of my child

.....
(name and surname of the child)

during organized by the Polish Robert Schuman Foundation and the use of this image by posting photos or videos on the Foundation's website, as well as on social media profiles for informational and promotional purposes of the Foundation and the aforementioned event.

I have been informed that the provision of data is voluntary, and I have the right to access and correct my data, including withdrawal of consent.

.....
(city, date)

.....
(legible signature of person giving consent)



Appendix 7

Survey monitoring the standards of the Child Protection Policy for employees and associates of the Foundation

<i>Question</i>	<i>YES</i>	<i>NO</i>
1. Did you know that the foundation has a child protection policy?		
2. Do you know the content of the foundation's child protection policy?		
3. Do you know the division of responsibilities for implementing the foundation's child protection policy?		
4. Do you know what your responsibilities are under the content of the child protection policy?		
5. Do you know how to respond to symptoms of child abuse and child abuse?		
6. Have you ever observed a violation of the child protection policy by another employee or associate?		
6a. If yes - what rules were violated? (descriptive answer)		
6b. Have you taken any action? If so, which ones?		



<p>6c. If not - why not?</p> <p>.....</p> <p>.....</p> <p>.....</p>		
<p>7. Is the current policy sufficient in protecting children?</p>		
<p>8. Do you have any comments/improvements/suggestions regarding child protection standards? (descriptive answer)</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p>		



Appendix 8

List of positions developed on the basis of risk analysis

The list of positions was developed on the basis of the risk analysis and corresponds to the content of Article 21. 1. of the Law of July 28, 2023, amending the Law - Family and Guardianship Code and some other laws: “Before entering into an employment relationship with a person or before allowing a person to engage in any other activity related to the 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, the employer or other organizer of such activity and the person with whom the employment relationship is to be established or who is to be allowed to engage in such activity shall have the obligations set forth in paragraphs 2-8.”

There are persons in the Foundation Team who perform the above-described activities: 1. regularly, 2. occasionally, 3. never. The positions have been divided on the basis of actual and potential responsibilities.

To group 1. belong associates of the Foundation bound by a volunteer contract within the framework of the European Solidarity Corps.

Group 2. includes employees and associates of the Foundation holding expert, coordinating, coaching, administrative positions, as well as the Management Board of the Foundation.

Group 3. includes employees and associates of the Foundation holding positions in the IT department, accounting.



Appendix 9

Child Protection Policy for Children

1. What is the Child Protection Policy?

It's a policy that helps keep children safe during the activities organized by our Foundation. We want all children to feel comfortable and protected from harm.

2. What are our policies?

Equal treatment: Every child is important, no matter where they come from, what they look like or what they like.

Safety: No one can beat, insult, threaten or force children to do things they don't want to do.

Respect: We treat children the way we want to be treated ourselves - with respect and kindness.

3. How do we keep you safe?

- The adults who work with you are trained in how to support you.
- Photos and recordings of you can only be used with the permission of your parents or guardians.
- If something is worrying you, you can tell someone at the Foundation. Your concerns will be taken seriously.

4. What to do if something is wrong?

If you feel threatened or someone is hurting you, you can, among other things:

- Talk to an adult you trust.
- Tell a person from the Foundation, such as a Supervisor, coordinator, volunteer.
- Call the Children and Youth Helpline number: 116 111.

5. Your rights

You have the right to be safe, have your say and be treated with respect.

6. Important contacts

If you have questions or something is going on, you can contact the Foundation at: +48 571 487 359 or e-mail: pocza@schuman.pl. Also remember such phones as the Child and Youth Helpline (116 111) and the emergency number (112).



*Child Protection Policy adopted by the Resolution of the
Board of the Polish Robert Schuman Foundation on
23.12.2024*