

## **ANNEX**

**to Resolution of the Board of the Institute KOSMOPOLIS Science, Culture and Education Foundation**

**No. Z/1/2024**

**dated 31 January 2024**

**on the approval of the Child Safeguarding Policy and Procedures**

Institute KOSMOPOLIS  
Science, Culture and Education Foundation  
Plac gen. Józefa Bema 2  
10-516 Olsztyn  
Warmian-Masurian Voivodeship

Olsztyn, 2024-01-31

# **CHILD SAFEGUARDING POLICY AND PROCEDURES**

## **Preamble**

The overriding principle of all activities undertaken by the Institute KOSMOPOLIS Science, Culture and Education Foundation addressed to minors is to act for the well-being of the child and in their best interest. Every member, employee, or associate of the Institute KOSMOPOLIS Science, Culture and Education Foundation is obliged to treat each child with respect and to take their individual needs into account. The use of any form of violence against a child by anyone is strictly prohibited. In pursuit of these objectives, the Institute KOSMOPOLIS Science, Culture and Education Foundation operates within the framework of applicable law, based on the Foundation's Statutes, resolutions of the Foundation's Management Board, internal guidelines and regulations, as well as its own competencies and organizational experience developed through years of activity in the field of cultural education.

## **Legal Basis for the Child Safeguarding Policy**

### **Glossary of Terms / Explanation of Terms Used in the Child Safeguarding Policy**

#### **§ 1.**

1. Organisation shall mean the Institute KOSMOPOLIS Science, Culture and Education Foundation, with its registered office at Plac gen. Józefa Bema 2, 10-516 Olsztyn, NIP (Tax ID): 796-296-10-19, REGON: 146515722.
2. Personnel or Staff Member shall mean any person employed under an employment contract or a civil law contract, a member of the organisation, as well as volunteers and interns.

3. Management Board shall mean the body within the organisation's structure which, in accordance with applicable law and internal documents, is authorized to make decisions regarding the organisation's activities.
4. Child shall mean any person under the age of 18.
5. Guardian of a Child shall mean a person authorised to represent the child, in particular their parent or legal guardian. For the purposes of this document, a foster parent is also considered a guardian.
6. Parental Consent shall mean the consent of at least one of the child's parents or legal guardians. However, in the event of a lack of agreement between the parents, they must be informed of the necessity to have the matter resolved by a family court.
7. Child Harm / Abuse shall mean the commission of a prohibited or punishable act to the detriment of a child by any person, including a staff member of the organisation, or any threat to the child's well-being, including neglect.
8. Person Responsible for the Internet shall mean a staff member designated by the Management Board to supervise the use of the Internet by children within the organisation and to ensure the safety of children online.
9. Person Responsible for the Child Protection Policy shall mean a staff member designated by the Management Board to supervise the implementation of the Child Protection Policy within the organisation.
10. Child's Personal Data shall mean any information that enables the identification of a child.

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

### **§ 2.**

1. Staff members possess knowledge regarding the risk factors and symptoms of child harm and shall remain vigilant of them in the course of their duties.
2. In the even that risk factors are identified, staff members shall engage in a discussion with the guardians, providing information on the available support services and motivating them to seek assistance.
3. Staff shall monitor the situation and the well-being of the child.

## **Staff Recruitment Rules (Employees / Organisation Members / Volunteers / Interns / Trainees)**

### **§ 3.**

Staff recruitment is conducted in accordance with the principles of safer recruitment. These principles are set out in **APPENDIX NO. 1** to this Policy.

## **Rules for Safe Relationships Between Staff (Employees, Organisation Members, Volunteers, Interns, Trainees) and Children**

### **§ 4.**

Staff are familiar with and shall apply the rules for safe staff–child and child–child relationships established within the organisation. These rules are set out in **APPENDIX NO. 2** to this Policy.

## **Intervention Procedures in Cases of Suspected Child Harm**

### **§ 5.**

1. Threats to children's safety may take various forms and occur through various means of contact and communication.
2. For the purposes of this document, the following classification of threats to children's safety has been adopted:
  - a. a crime has been committed to the detriment of a child (e.g., sexual abuse, physical or mental abuse),
  - b. another form of harm has occurred that does not constitute a crime (such as shouting, corporal punishment, or humiliation),
  - c. neglect of the child's basic life needs has occurred (e.g., related to nutrition, hygiene, or health).

3. For the purposes of this document, intervention procedures have been distinguished for cases of suspected actions to the detriment of a child by:
  - a. adults (staff, other third parties, parents/legal guardians),
  - b. another child.

#### § 6.

1. In the event that a staff member suspects a child is being harmed, or if such a circumstance is reported by a child or their guardian, the staff member is obliged to prepare an official internal note and convey this information to the Management Board. The note must be in writing – either in paper or electronic form.
2. The intervention is conducted by the Management Board, which may permanently appoint another person for this task. Should such a person be appointed, their details (full name, e-mail, telephone number) shall be made known to staff, children, and guardians.
3. In the event that another person is appointed to lead the intervention, the term "Management Board" shall be understood to mean the person responsible for conducting the intervention.
4. If harm is reported on the part of the person appointed to lead the intervention, then the intervention shall be conducted by the Management Board.
5. If harm is reported on the part of the Management Board, and no other person has been appointed to lead the intervention, then the actions described in this chapter shall be undertaken by the Boards of Founders of the Institute KOSMOPOLIS Science, Culture and Education Foundation or by the individual who identified the harm or to whom the suspected harm was reported.
6. Specialists, particularly psychologists and pedagogues, may be invited to participate in the intervention to provide assistance when speaking with the child about difficult experiences.
7. The Management Board shall inform the guardians of the obligation to report suspected child harm to the appropriate authorities (prosecutor's office, police, family and guardianship court, or the nearest social welfare centre).
8. After informing the guardians in accordance with the preceding point, the Management Board shall submit a notification of suspected criminal activity to the prosecutor's office/police, or a request to review the family situation to the district court (family and juvenile department) or the social welfare centre.
9. Any further proceedings fall within the competence of the institutions indicated in the preceding point.
10. An intervention record sheet shall be prepared for each intervention, a template of which is provided in **APPENDIX NO. 3** to this Policy. The record sheet shall be added to the intervention register maintained by the organisation.

#### § 7.

In the event of a suspicion that a child's life is at risk or that they are facing a threat of grievous bodily harm, the relevant emergency services (police, ambulance) must be informed immediately by calling **112** or **999** (ambulance). The services shall be notified by the staff member who first became aware of the threat, who shall then complete the intervention record sheet.

### Abuse by an Adult

#### § 8.

1. In the event that child harm has been reported, the Management Board shall conduct an interview with the child and other persons who have, or may have, knowledge of the incident and the child's personal situation (family, health), in particular their guardians. The Management Board shall endeavour to establish the course of events, as well as the impact of the incident on the child's mental and physical health. The findings shall be documented on the intervention record sheet.

2. The Management Board shall organise a meeting (or meetings) with the child's guardians to provide information about the incident and the need for, or possibility of, obtaining specialist support, including from other organisations or services.
3. In the event that a crime has been committed against the child, the Management Board shall prepare a notification of a suspected criminal offence and submit it to the locally competent police or prosecutor's office.
4. In the event that the discussion with the guardians indicates that they are not interested in assisting the child, are ignoring the incident, or are otherwise failing to support the child who has experienced harm, the Management Board shall prepare a request to review the family situation, which shall be addressed to the competent family court.
5. In the event that the findings indicate a guardian is neglecting the child's psychophysical needs, or the family is failing to provide adequate care (e.g., the child wears clothing inappropriate for the weather, or leaves the place of residence without adult supervision), or the family is using violence against the child (a parent/other household member shouts at the child or uses corporal punishment), the relevant social welfare centre must be informed of the need to assist the family if the failure to meet needs results from poverty, or – in cases of violence and neglect – of the necessity to initiate the "Blue Card" procedure.
6. In the event that a staff member is reported for child harm, that individual shall be removed from all forms of contact with children (not only the victimised child) until the matter is resolved.
7. In the event that a staff member has committed a form of harm against a child other than a criminal offence, the Management Board shall investigate all circumstances of the case, in particular by hearing the person suspected of harm, the child, and other witnesses to the incident. In situations where the breach of the child's well-being is significant, especially in cases of discrimination or violation of the child's dignity, termination of the legal relationship with the person who committed the harm should be considered, or such termination should be recommended to that person's superiors. If the person who committed the harm is not directly employed by the organisation but by a third party, a recommendation shall be made to ban that person from the organisation's premises (and/or the facilities where the organisation carries out its statutory activities) and, if necessary, the contract with the partner institution shall be terminated.
8. All persons who, in the course of their professional duties, have obtained information regarding child harm or related information, are obliged to maintain the confidentiality of such information, excluding information provided to authorised institutions as part of intervention activities.
9. In the event that a suspicion regarding a child's safety was reported by the child's guardians and such suspicion has not been confirmed, the child's guardians shall be informed of this fact in writing.

## **Peer-on-Peer Abuse**

### **§ 9.**

1. In the event of suspected harm caused to a child by another child present within the organisation (e.g., during group activities), an interview shall be conducted with the child suspected of causing harm and their guardians, as well as separately with the child subjected to harm and their guardians. Furthermore, discussions shall be held with other persons having knowledge of the incident. During these interviews, efforts shall be made to establish the course of events, as well as the impact of the incident on the mental and physical health of the victimised child. The findings shall be documented on the intervention record sheet. Separate intervention record sheets shall be prepared for both the child causing harm and the child subjected to harm.
2. A corrective action plan shall be developed in cooperation with the guardians of the child causing harm, aimed at changing undesirable behaviours.
3. A safety plan shall be developed with the guardians of the child subjected to harm, incorporating methods to isolate the child from sources of danger.

4. During the interviews, it must be ensured that the child suspected of harming another child is not themselves being harmed by guardians, other adults, or other children. Should such circumstances be confirmed, an intervention must also be undertaken in relation to that child.
5. In the event that the child causing harm does not participate in the organisation's activities, an interview shall be conducted with the child subjected to harm, other persons with knowledge of the incident, and the guardians of the victimised child to establish the course of events and the impact of the incident on the child's mental and physical health. The Management Board shall organise a meeting (or meetings) with the child's guardians to provide information about the incident, the need for or possibility of obtaining specialist support (including from other organisations or services), and potential ways to respond to the incident (e.g., informing the family court, the school, or the guardians of the child causing harm).
6. If the person suspected of causing harm is a child aged between 13 and 17 and their behaviour constitutes a punishable act, the locally competent family court or the police must also be informed via a written notification.
7. If the person suspected of causing harm is a child over the age of 17 and their behaviour constitutes a criminal offence, the locally competent police unit or prosecutor's office must be informed via a written notification.

## Principles of Personal Data and Child Image Protection within the Organisation

### § 10.

1. The Organisation ensures the highest standards of protection for children's personal data in accordance with applicable legal regulations.
2. The Organisation, recognising the child's right to privacy and the protection of personal rights, ensures the protection of the child's image, while taking into account the specific nature of the Organisation's activities in the fields of cultural, audiovisual, and media education. An essential element of these activities is practical work with image and sound recording devices, which serve as educational tools within the Organisation.
3. Guidelines regarding the principles of publishing a child's image are set out in **APPENDIX NO. 4** to this Policy.

### § 11.

1. Staff members are prohibited from allowing media representatives to record a child's image (filming, photography, voice recording) on the Organisation's premises without the written consent of the child's guardian.
2. In order to obtain the consent referred to above, staff members may contact the child's guardian to establish the procedure for obtaining such consent. It is unacceptable to provide a media representative with the contact details of a child's guardian without the prior knowledge and consent of said guardian.
3. If the child's image constitutes only a detail of a larger whole, such as a gathering, a landscape, or a public event, the guardian's consent for recording the child's image is not required.

### § 12.

1. The public disclosure by a staff member 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 regarding where the recorded image will be published and the context in which it will be used (e.g., that it will be placed on the website for promotional purposes).

## Principles for the Safe Use of the Internet and Electronic Media

### § 13.

1. The Organisation, in 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 kept up to date.

2. A child's access to the Internet is possible:
  - a. under the supervision of a staff member – on the Organisation's devices,
  - b. without supervision – on computers designated for this purpose (open access),
  - c. via the Organisation's Wi-Fi network, upon entering a password.
3. In the case of access provided under the supervision of a staff member, that individual is obliged to inform the children of the principles of safe Internet use. The staff member shall also oversee the safety of children's Internet use during activities.
4. The Organisation ensures constant access to educational materials regarding safe Internet use near the computers where open access to the network is available.

#### **§ 14.**

1. The Person Responsible for the Internet shall ensure that the Organisation's network is protected against harmful content by installing and updating appropriate, modern software.
2. Before providing a child with a device that has Internet access (e.g. a computer or tablet), the Person Responsible for the Internet shall check whether any harmful content is present on the device designated for open access. Should any harmful content be found, the designated person shall endeavour to determine who was using the device at the time the content was introduced.
3. The Person Responsible for the Internet shall provide information regarding the child who used the device at the time the harmful content was introduced to the Management Board, which shall then notify the child's guardians of the incident.

### **Monitoring**

#### **§ 15.**

1. The Management Board shall designate the Person Responsible for the Child Protection Policy within the organisation by way of a board resolution.
2. The person referred to in the preceding point is responsible for monitoring the implementation of the Policy, responding to reports of Policy violations, and proposing amendments to the Policy.
3. Once every 12 months, the person referred to in the preceding point shall conduct a monitoring survey among staff members to assess the level of Policy implementation. A template of the survey is provided in **APPENDIX NO. 5** to this Policy.
4. In the survey, staff members may propose amendments to the Policy and indicate any violations of the Policy within the organisation.
5. The person referred to in paragraph 1 of this section shall analyse the surveys completed by staff members. Based on this, they shall prepare a monitoring report, which is then submitted to the Management Board.
6. The Management Board shall introduce the necessary amendments to the Policy and announce the new version of the Policy to the staff.

### **Final Provisions**

#### **§ 16.**

1. The Policy shall enter into force on the date of its adoption by the Management Board.
2. The announcement shall be made in a manner accessible to the organisation's staff, in particular by sending the text via electronic means.

#### **Signatures of the Management Board**

## Principles of Safer Staff Recruitment

1. Obtain information regarding the candidate that will allow you to best assess their qualifications, including their alignment with the values shared by the organisation, such as the protection of children's rights and respect for their dignity. The Organisation must ensure that persons employed by it (including those working under civil law contracts, interns, trainees, and volunteers) possess appropriate qualifications for working with children and that their actions and behaviours are safe for children. To verify the above, including the candidate's attitude towards children and their commitment to values related to respect for children and the observance of their rights, the Organisation may request data (including documents) concerning:

- a. education,
- b. professional qualifications,
- c. the candidate's previous employment history.

In every case, the Organisation must possess data allowing for the identification of the person it employs, regardless of the basis of employment. Therefore, the Organisation should know the individual's:

- a. name(s) and surname,
- b. date of birth,
- c. contact details.

2. Request references from the candidate's previous places of employment. The Organisation may ask the candidate to provide references from a previous employer or to provide contact details for a person who can issue such references. The provision of references or contact details for former employers is based on the candidate's consent. Under applicable regulations, the failure to provide such data should not result in negative consequences for the individual, such as a refusal of employment based solely on these grounds. The Organisation may not independently conduct so-called "screening" of job applicants, as it is restricted in this regard by the provisions of the General Data Protection Regulation (GDPR) and the Labour Code.

3. Obtain the candidate's personal data, including the information required to check their details in the Register of Sexual Offences. Before allowing an employed person to perform duties related to the care of minors, the Organisation is obliged to check the individual in the Register of Sexual Offences – restricted access register, and the Register of persons against whom the State Commission for Counteracting Sexual Abuse of Minors under the Age of 15 has issued a decision for entry in the Register. The Register is available at: [rps.ms.gov.pl](https://rps.ms.gov.pl). To obtain information from the restricted access register, it is first necessary to create an organisational profile. To check a person in the Register, the Organisation requires the following candidate data.

To check a person in the Register, the Organisation requires the following candidate data:

- a. name and surname,
- b. date of birth,
- c. PESEL (National Identification Number),
- d. maiden name / family name at birth,
- e. father's name,
- f. mother's name.

A printout from the Register must be kept in the employee's personnel file or in analogous documentation concerning a volunteer or a person employed under a civil law contract.

4. Obtain from the candidate information from the National Criminal Register (KRK) regarding the absence of a criminal record for offences defined in Chapters XIX and XXV of the Penal Code, in Art. 189a and Art. 207 of the Penal Code, and in the Act of 29 July 2005 on Counteracting Drug Addiction, or for prohibited acts under foreign law corresponding to these offences. If the person holds citizenship other than Polish, they should also provide information from the criminal register of their country of citizenship, obtained for the purposes of professional or voluntary activities involving contact with children, or general information from the criminal register if the law of that country does not provide for the issuance of information for the aforementioned purposes.
5. Obtain from the candidate a statement regarding the country/countries of residence within the last 20 years, other than the Republic of Poland and their country of citizenship, made under penalty of perjury. If the law of a country from which the criminal record information is to be submitted does not provide for the issuance of such information, or if that country does not maintain a criminal register, the candidate shall submit, under penalty of perjury, a statement of this fact together with a declaration that they have not been finally convicted in that country for prohibited acts corresponding to the offences defined in Chapters XIX and XXV of the Penal Code, in Art. 189a and Art. 207 of the Penal Code, and in the Act of 29 July 2005 on Counteracting Drug Addiction, and that no other judgment has been issued against them stating that they committed such prohibited acts, and that they are not subject to any obligation arising from a court ruling, another authorised body, or a statute, to comply with a prohibition on holding any or specified positions, or practising any or specified professions or activities related to the upbringing, education, recreation, medical treatment, provision of psychological counselling, spiritual development, sports, or the pursuit of other interests by minors, or their care.
6. Statements made under penalty of perjury must be followed by a declaration with the following wording: *I am aware of the criminal liability for making a false statement.* This declaration replaces the authority's notification regarding criminal liability for making a false statement.
7. Where permitted by law, the Organisation is obliged to demand a certificate from the National Criminal Register from the person being employed. A certificate from the National Criminal Register may only be requested in cases where the law explicitly states that employees in specific professions or positions are subject to a clean criminal record requirement. The clean criminal record requirement applies, among others, to teachers (including teachers and carers employed in public and non-public institutions), as well as to holiday camp managers and childcare supervisors.
8. In the event that it is impossible to provide a certificate, ask the candidate to submit a declaration of a clean criminal record and the absence of any pending preparatory, judicial, or disciplinary proceedings against them for crimes or other acts committed against children. A refusal to submit such a declaration must not result in any negative consequences for the candidate, nor can it serve as the sole basis for a refusal of employment. Below is an exemplary form for such a declaration (**APPENDIX NO. 1A**).

TEMPLATE FOR THE DECLARATION OF A CLEAN CRIMINAL RECORD

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**DECLARATION OF A CLEAN CRIMINAL RECORD**

.....  
place and date

I, .....

PESEL no. .... / passport no. ....  
declare that in the country of ..... no criminal register is maintained / no information is issued from the criminal register. I declare that I have not been finally convicted in the country of ..... for prohibited acts corresponding to the offences defined in Chapters XIX and XXV of the Penal Code, in Art. 189a and Art. 207 of the Penal Code, and in the Act of 29 July 2005 on Counteracting Drug Addiction, and that no other judgment has been issued against me stating that I committed such prohibited acts, and that I am not subject to any obligation arising from a court ruling, another authorised body, or a statute, to comply with a prohibition on holding any or specified positions, or practising any or specified professions or activities related to the upbringing, education, recreation, medical treatment, provision of psychological counselling, spiritual development, sports, or the pursuit of other interests by minors, or their care.

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

.....  
signature

TEMPLATE FOR THE DECLARATION OF COUNTRIES OF RESIDENCE

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....., dated .....

**DECLARATION OF COUNTRIES OF RESIDENCE**

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

1. ....
2. ....
3. ....

and I concurrently submit information from the criminal registers of these countries obtained for the purposes of professional or voluntary activities involving contact with children / information from the criminal registers.

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

.....  
signature

## **Principles of Safe Staff-Child Relationships**

The overriding principle of all actions undertaken by the staff of the Institute KOSMOPOLIS Science, Culture and Education Foundation is to act for the well-being of the child and in their best interests. Staff shall treat every child with respect and take into account their dignity and needs. It is unacceptable to use violence against a child in any form. In pursuing these objectives, staff shall act within the framework of applicable law, the organisation's internal regulations, and their own professional competences. The principles of safe staff-child relationships apply to all employees, contractors, interns, trainees, volunteers, and members of the organisation, as well as to any adult having contact with children under the organisation's care, provided that such contact occurs with the organisation's consent and/or on its premises. Knowledge and acceptance of these principles are confirmed by signing a declaration.

### **Staff-Child Relationships**

Staff members are obliged to maintain professional boundaries with children and must consistently consider whether their reactions, communications, or actions towards a child are appropriate to the situation, safe, justified, and fair to other children. Staff must act in an open and transparent manner to minimise the risk of their behaviour being misinterpreted.

### **Communication with Children**

1. Communication with children must be conducted with patience and respect.
2. Children should be listened to attentively, and responses should be appropriate to their age and the specific situation.
3. Staff must not shame, humiliate, disregard, or insult a child. Shouting at a child is prohibited, except in situations where it is necessary for the safety of the child or others.
4. Sensitive information regarding a child must not be disclosed to unauthorised persons, including other children. This includes the child's image as well as information regarding their family, economic, medical, care, or legal situation.
5. When making decisions concerning a child, the child must be informed, and efforts should be made to take their expectations into account.
6. The child's right to privacy must be respected. If it becomes necessary to deviate from the principle of confidentiality in order to protect the child, this must be explained to them as soon as possible.
7. Staff should ensure they are within sight or hearing of other staff members while conducting activities with children. In exceptional and justified circumstances, where a staff member must be alone with a child, they must notify other staff members each time, specifying the exact location where they will be staying with the child.
8. Inappropriate behaviour in the presence of children is strictly prohibited. This includes the use of vulgar language, gestures, or jokes; making offensive remarks; referring to sexual activity or attractiveness; and exploiting a position of power or physical advantage over the child (intimidation, coercion, threats).
9. Children should be reassured that if they feel uncomfortable in any situation, or with specific behaviour or words, they can report it to a designated person (depending on the intervention procedures adopted by the organisation) and can expect an appropriate response and/or assistance.

## Activities with Children

1. Children's contributions to activities should be valued and respected; they should be actively engaged and treated equally, regardless of their gender, sexual orientation, ability/disability, social status, ethnicity, culture, religion, or worldviews.
2. Favouritism towards children must be avoided.
3. Staff must not enter into any romantic or sexual relationships with a child or make proposals of an inappropriate nature. This also includes sexual comments, jokes, gestures, and the sharing of erotic or pornographic content with children, regardless of its form.
4. Recording a child's image (filming, voice recording, photography) for private use is strictly prohibited. This also applies to allowing third parties to record children's images if the Management Board has not been informed, has not granted consent, and has not obtained the necessary consents from parents/legal guardians and the children themselves.
5. Staff must not offer alcohol, tobacco products, or illegal substances to children, nor should they use such substances in the presence of children.
6. Accepting money or gifts from a child or their parents/legal guardians is prohibited. Staff must not enter into any relationship of dependency with a child or their parents/guardians that could lead to allegations of unequal treatment or the pursuit of financial or other benefits.
7. All high-risk situations, including cases where a child develops an infatuation with a staff member or vice versa, must be reported to the Management Board. Witnesses to such situations should respond firmly but with sensitivity, in order to maintain the dignity of the individuals involved.

## Physical Contact with Children

Any act of violence against a child is unacceptable. However, there are situations in which physical contact with a child may be appropriate and compliant with the principles of safe contact: provided it is a response to the child's needs at a given moment, and takes into account the child's age, developmental stage, gender, as well as cultural and situational contexts. It is impossible to establish a universal appropriateness for every instance of physical contact, as behaviour that is appropriate for one child may be inappropriate for another. Staff should always exercise professional judgement, listening to, observing, and noting the child's reaction, asking for consent for physical contact (e.g., a hug), and remaining aware that even with good intentions, such contact can be misinterpreted by the child or third parties.

1. It is strictly prohibited to hit, poke, push, or in any way violate the physical integrity of a child.
2. A child must never be touched in a manner that could be considered indecent or inappropriate.
3. Staff must always be prepared to explain their actions.
4. Staff should not engage in activities such as tickling, play-fighting, or rough physical play.
5. Particular caution should be exercised towards children who have experienced abuse or harm, including sexual or physical abuse or neglect. Such experiences may sometimes lead a child to seek inappropriate or disproportionate physical contact with adults. In such situations, staff should respond with sensitivity yet firmness, helping the child understand the importance of personal boundaries.
6. Physical contact with a child must never be secretive or concealed, involve any form of gratification, or stem from a position of power. Witnesses to any of the behaviours or situations described above involving other adults or children must inform the responsible person and/or follow the established intervention procedure.
7. During the implementation of programme activities organised away from the child's place of residence (e.g., trips, residential courses, or workshops), it is unacceptable to share a bed or a room with a child, or to remain in areas designated for children's rest for purposes other than organisational or maintenance tasks.

## **Contact Outside of Working Hours**

As a general rule, contact with children should take place exclusively during the delivery of programme activities and must pertain to objectives within the scope of staff duties.

1. Staff must not invite children to their place of residence or meet with them outside of working hours. This also includes contact with children via private communication channels (personal telephone, email, messaging apps, or social media profiles).
2. Should the need arise, the appropriate form of communication with children and their parents/guardians outside of working hours is through official business channels (work email, business telephone).
3. If a meeting with children outside of working hours is necessary, the Management Board must be informed, and the children's parents/legal guardians must grant their consent for such contact.
4. Maintaining social or family relationships (in cases where children and their parents/guardians are close to a staff member) requires maintaining the confidentiality of all information concerning other children and their parents/guardians.

## **Online Safety**

Organisation staff must be aware of digital threats and the risks arising from the tracking of user activity online by applications and algorithms, as well as from individual actions taken on the Internet. This includes liking specific pages, using dating apps where one might encounter children with whom professional activities are conducted, following specific individuals/pages on social media, and the privacy settings of accounts on websites and social media platforms. Staff members must be aware that if their online profiles are publicly accessible, children and their parents/guardians will have insight into their digital activity in these areas.

1. Staff must not establish contact with children under the organisation's care by accepting or sending invitations on social media.
2. During classes or other activities conducted by the organisation, personal electronic devices should be switched off or silenced, and Bluetooth functionality should be disabled.

**APPENDIX NO. 3**  
**to the CHILD SAFEGUARDING POLICY AND PROCEDURES**  
**dated 31 January 2024**

**TEMPLATE FOR THE INTERVENTION LOG SHEET**

**INTERVENTION LOG SHEET**

|                                                                                                                                                 |                                                                                                                                                                                                           |                     |
|-------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
| 1. Child's name and surname                                                                                                                     |                                                                                                                                                                                                           |                     |
| 2. Reason for intervention (form of abuse)                                                                                                      |                                                                                                                                                                                                           |                     |
| 3. Person reporting the suspected abuse                                                                                                         |                                                                                                                                                                                                           |                     |
| 4. Description of actions taken (other than formal intervention)                                                                                | Date                                                                                                                                                                                                      | Action              |
|                                                                                                                                                 |                                                                                                                                                                                                           |                     |
|                                                                                                                                                 |                                                                                                                                                                                                           |                     |
|                                                                                                                                                 |                                                                                                                                                                                                           |                     |
| 5. Meetings with parents/legal guardians                                                                                                        | Date                                                                                                                                                                                                      | Meeting description |
|                                                                                                                                                 |                                                                                                                                                                                                           |                     |
|                                                                                                                                                 |                                                                                                                                                                                                           |                     |
|                                                                                                                                                 |                                                                                                                                                                                                           |                     |
| 6. Type of intervention (circle as appropriate)                                                                                                 | <ul style="list-style-type: none"> <li>• report of a suspected criminal offense,</li> <li>• request for a family/child welfare inquiry,</li> <li>• other type of intervention. Please specify:</li> </ul> |                     |
| 7. Intervention details (name of the authority notified) and date of intervention                                                               |                                                                                                                                                                                                           |                     |
| 8. Intervention outcomes: results of legal proceedings if known, actions taken by the organisation, or actions taken by parents/legal guardians | Date                                                                                                                                                                                                      | Action              |
|                                                                                                                                                 |                                                                                                                                                                                                           |                     |
|                                                                                                                                                 |                                                                                                                                                                                                           |                     |
|                                                                                                                                                 |                                                                                                                                                                                                           |                     |

## Child Image Protection and Personal Data Policy

These principles have been established in accordance with applicable legal regulations.

Our Values:

1. Practical work with audio-visual recording equipment is a fundamental educational tool in media literacy. Consequently, we exercise a high degree of responsibility and discretion when capturing, processing, using, and publishing images of children.
2. Sharing photos and videos of our activities serves to celebrate children's achievements and document our work, always with the children's safety as our primary concern.
3. Children have the right to decide whether their image is recorded and how it will be used by us.
4. Parental/legal guardian consent for the use of a child's image is only valid if both the children and their parents/legal guardians have been fully informed about how the photos/recordings will be used and the risks associated with their publication.

We ensure the safety of children's images by:

1. Requesting written consent from parents/legal guardians and obtaining the child's agreement before capturing or publishing any photo or recording.
2. Providing explanations regarding the purpose and context of the photos/recordings, how the data will be stored, and the potential risks associated with online publication.
3. Refraining from disclosing sensitive information about the child (e.g., health status, financial situation, or legal standing) in connection with their image.
4. Reducing the risk of unauthorised copying and inappropriate use of photos/recordings by adhering to the following rules:
  - a. all children in the photo/recording must be appropriately dressed, and the situation must not be demeaning or embarrassing, nor portray the child in a negative context,
  - b. photos/recordings should focus exclusively on the educational or substantive activities being performed by the children.
5. Refraining from publishing images of children no longer in our care, unless they or their parents/legal guardians have explicitly consented to the continued use of these images after the partnership with the organisation has ended.
6. Adhering to the principle that all suspicions and issues regarding the inappropriate distribution of children's images must be recorded and reported to the organisation's Board, alongside any other safeguarding concerns regarding children's safety.

**Recording children's images for the use of the Institute KOSMOPOLIS Science, Culture and Education Foundation:**

In situations where our organisation records images of children for its own use, we declare that:

1. Children and parents/legal guardians will always be informed that a given event is being recorded.
2. Written consent for the recording of the event will be obtained from parents/legal guardians.
3. If the recording of the event is outsourced to a third party (a hired photographer or videographer), we will ensure the safety of the children by:
  - a. obliging the person/company recording the event to comply with these guidelines,

- b. requiring the person/company recording the event to wear an identification badge throughout the duration of the event,
- c. ensuring that the person/company recording the event is never left alone with children without supervision from the organisation's staff,
- d. informing parents/legal guardians and children that a person/company recording the event will be present and ensuring that parents/legal guardians have provided written consent for the recording of their children's images.

If a child's image constitutes only a detail of a larger whole, such as a public gathering, landscape, or public event, the consent of the child's parents/legal guardians is not required.

### **Recording children's images for private use**

In situations where parents/guardians or participants of our events record images of children for private use, we inform them at the start of each event that:

1. The use, processing, and publication of photos/recordings containing the images of children and adults require the consent of those individuals or, in the case of children, the consent of their parents/legal guardians.
2. Photos or recordings containing images of children should not be shared on social media or open-access websites unless the parents/legal guardians of those children have given their consent.
3. Before publishing a photo/recording online, it is always advisable to check privacy settings to ensure who will be able to access the child's image.

### **Recording children's images by third parties and the media**

1. If media representatives or any other individual wish to record an event organised by us and publish the collected material, they must submit such a request in advance and obtain the consent of the organisation's Board. In such cases, we will ensure that parents/legal guardians have provided written consent for the recording of their children's images. We require the following information:
  - a. the full name and address of the individual or the editorial office requesting consent,
  - b. the justification for recording the event, as well as information on how and in what context the collected material will be used,
  - c. a signed declaration confirming that the information provided is accurate and true.
2. Organisation staff must not allow media representatives or unauthorised persons to record the image of a child under our care without the written consent of the child's parent/legal guardian and the consent of the Board.
3. Organisation staff shall not put media representatives in contact with children, nor provide the media with contact details for parents/legal guardians, and shall not comment to the media on matters concerning a child or their parent/legal guardian. This prohibition also applies to situations where a staff member believes their statement is not being recorded. In specific and justified cases, the organisation's Board may decide to contact the child's parents/legal guardians to establish a procedure for them to provide consent for media contact.
4. For the purpose of producing media material, the Board may decide to make selected rooms at the organisation's premises available for filming. In making such a decision, the Board shall instruct that the room be prepared in a manner that prevents the recording of other children present on the organisation's premises.

### **Storage of photos and recordings**

We store materials containing images of children in a lawful manner that ensures the children's safety:

1. Physical media containing photos and recordings are stored in a locked cabinet, and electronic media containing photos and recordings are stored in a protected folder with access restricted to persons authorised by the organisation. Media will be stored for the period required by archiving laws and/or the period established by the organisation in its personal data protection policy.

2. We do not store electronic materials containing images of children on unencrypted or mobile media, such as mobile phones and portable storage devices (e.g., USB flash drives).
3. We do not permit staff members to use personal recording devices (e.g., mobile phones, cameras, camcorders) for the purpose of recording images of children.
4. The only equipment used by the organisation is recording devices owned by the organisation or used under terms approved by the organisation's Board.

**APPENDIX NO. 5**  
**to the CHILD SAFEGUARDING POLICY AND PROCEDURES**  
**dated 31 January 2024**

**MONITORING SURVEY TEMPLATE ON THE IMPLEMENTATION OF THE CHILD SAFEGUARDING POLICY  
AND PROCEDURES**

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**MONITORING OF STANDARDS – SURVEY**

|                                                                                                                                                                                                        | Yes | No |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|
| 1. Are you familiar with the child safeguarding standards in force within the organisation?                                                                                                            |     |    |
| 2. Are you familiar with the contents of the <i>Child Safeguarding Policy and Procedures</i> document?                                                                                                 |     |    |
| 3. Are you able to recognise the signs of child abuse?                                                                                                                                                 |     |    |
| 4. Do you know how to respond to the signs of child abuse?                                                                                                                                             |     |    |
| 5. Have you ever observed a breach of the rules contained in the <i>Child Safeguarding Policy</i> by another member of staff (employee, contractor, intern, volunteer, or member of the organisation)? |     |    |
| 5a. If yes – which rules were breached? (descriptive answer)                                                                                                                                           |     |    |
| 5b. Did you take any action: if yes – what kind, if no – why? (descriptive answer)                                                                                                                     |     |    |
| 6. Do you have any comments, amendments, or suggestions regarding the <i>Child Safeguarding Policy</i> ? (descriptive answer)                                                                          |     |    |

## Principles of Safe Use of the Internet and Electronic Media

1. The network infrastructure at the organisation's premises, or within facilities where the organisation operates, provides Internet access to both staff and children, both during and outside of activities.
2. The network is monitored to ensure that perpetrators of any potential abuse can be identified.
3. Organisational solutions at the institutional level are based on current security standards.
4. A person responsible for network security within the organisation has been designated. The duties of this person include:
  - a. Securing the Internet network at the organisation's premises, or within facilities where the organisation operates, against harmful content by installing and updating appropriate, modern software.
  - b. Updating software as required
  - c. Checking computers with unrestricted Internet access for the presence of harmful content. Should harmful content be found, the designated staff member shall attempt to determine who was using the computer at the time the content was accessed. Information regarding a child who used the computer when harmful content was accessed shall be passed by the designated staff member to the Board. The Board shall then organise a meeting with the child's guardians to provide information about the incident and the need for or possibility of specialist support (including from other organisations or authorities), and to discuss appropriate response measures.
5. In cases where access is provided under the supervision of organisation staff, the staff are obliged to inform children about the principles of safe Internet use. Staff also monitor the safety of children's Internet use during activities.