

**The Policy of Children Protection against Abuse in
schools, preschools and psycho-educational
counselling centres run
by the Gdansk Educational Foundation**

Preamble

The fundamental principle of all actions taken by the personnel of a school/preschool/psychological-pedagogical counselling centre is to act for the benefit and in the best interests of the child. The employees of the school/preschool/psychological/pedagogical counselling centre shall treat the child with respect and take into account the child's needs. It is unacceptable for an employee to use any form of abuse against a child. The employee of the school/preschool/psychological-pedagogical counselling centre, in pursuing these objectives, acts within the framework of the applicable law, the internal regulations of the school/preschool/psychological-pedagogical counselling centre concerned and his/her competence.

Chapter I

Explanation of terms

§ 1

1. The term school/preschool/counselling centre as used in this document bears the following meaning, being run by the Gdansk Educational Foundation:
 - a) Gdansk Autonomous High School
 - b) Gdansk Autonomous Primary School;
 - c) Sopot Autonomous High School;
 - d) Sopot Autonomous Primary School;
 - e) High International School of Gdansk
 - f) Elementary International School of Gdansk
 - g) International Preschool of Gdansk
 - h) "Osiek" Psychological and Pedagogical Counselling Centre [PPP "Osiek"].
2. An employee of the school/preschool/counselling centre is a person employed on the basis of an employment contract or a contract of mandate.
3. A child is any person under the age of 18.
4. The guardian of a child is a person entitled to represent the child, in particular the child's parent or legal guardian. As used herein, a guardian is also a foster parent.

5. The consent of the child's parent means the consent of at least one of the child's parents. However, in the event of disagreement between the child's parents, the parents must be informed that the matter must be decided by the Family Court.
6. Child abuse should be understood as committing a prohibited or criminal act to the detriment of a child by any person, including an employee of the school/preschool/counselling centre, or a threat to the welfare of a child, including neglect.
7. The person in charge of the Internet is a staff member, appointed by the school/preschool/counselling centre, who supervises children's use of the Internet on the school/preschool/counselling centre premises and the safety of children on the Internet.
8. The child's personal information is any information that allows the child to be identified.
9. Whenever the word *Policy* appears in the content of this document it is used in the sense of the *Policy of Children Protection against Abuse (including Appendices)*.

Chapter II

Identifying and responding to the risk factors for child abuse

§ 2

1. The employees of the school/preschool/ counselling centre respectively, have the knowledge and stay alert to the risk factors and symptoms of child abuse as a part of their duties.
2. When risk factors are identified, a teacher (designated by the management of school/preschool/counselling centre) of the school/preschool/counselling centre respectively, communicates the parents, providing information on the available offer of support and motivates them to seek help.
3. A teacher designated by the management of the school/preschool/ counselling centre observes the child's situation.
4. The employees of the school/preschool/ counselling centre respectively, are aware of and apply the safe personnel-to-child and child-to-child relationship policies established in the school/preschool/counselling centre.
5. The recruitment of the employees of the school/preschool/counselling centre is carried out in accordance with the Safe Employees Recruitment Policy (attached as Appendices).

Chapter III

Procedures for intervention in the cases of child abuse

§ 3

If a member of staff of the school/preschool/counselling centre suspects that a child is being abused, the member of staff is required to make a staff note and pass on the information obtained (at their choice) to the class teacher, the pedagogue, the psychologist, the management of the school/preschool/ counselling centre.

§ 4

1. The pedagogue/psychologist or a teacher designated by the management of the school/preschool/counselling centre (of choice) summons the guardians of the child who he/she suspects to be the subject of abuse and informs them of the suspicion.
2. The pedagogue/psychologist or a teacher designated by the management of the school/preschool/counselling centre (of choice) should draw up a description of the child's school/preschool and family situation on the basis of interviews with the child, teachers, division/class/profile supervisor and the parents, and draw up a help plan for the child.
3. The help plan for the child should include the guidance on:
 - a) undertaking by the school/preschool/counselling centre action to keep the child safe, including reporting the suspected abuse to appropriate services;
 - b) the support which the school/preschool/counselling centre will offer the child;
 - c) referring the child to a specialist child welfare service if needed.

§ 5

In more complex cases (involving sexual abuse, physical and mental abuse), the management of the school/preschool/counselling centre appoints an intervention team, which may include: the pedagogue/psychologist, the supervisor of the child's class/profile, the management of the school/preschool/counselling centre, other staff having knowledge of the child's abuse or knowledge of the child (hereinafter referred to as the Intervention Team).

The Intervention Team draws up a plan for helping the child, meeting the requirements specified in § 4(3) of the Policy, on the basis of a description prepared by the pedagogue/psychologist or a teacher designated by the management of the school/preschool/counselling centre and other information obtained by the team members.

In the case when the suspected child abuse was reported by the child's parents/legal guardians, the Intervention Team shall summon the child's parents/legal guardians to an investigation meeting, during which it may propose to diagnose the reported suspicion at an external, impartial institution.

Minutes of the Intervention Team meeting shall be drawn up.

§ 6

1. The help plan for the child is presented by the pedagogue/psychologist or a teacher designated by the management of the school/preschool/counselling centre to the parents/legal guardians with a recommendation to cooperate in its implementation.
2. The pedagogue/psychologist or the teacher indicated by the school/preschool/counselling centre management informs the parents/legal guardians of the school's/preschool's obligation to report the suspected child abuse to relevant institution (Public Prosecutor's Office/Police or Family Court, Social Welfare Centre or the Head of the Intervention Team - "Blue Card" procedure - depending on the diagnosed type of abuse and the intervention correlated therewith).
3. After the parents/legal guardians have been informed by the pedagogue/psychologist or the teacher designated by the management of the school/preschool/ counselling centre - in accordance with the preceding point - the management of the school/preschool submits a notice of suspected crime to the Public Prosecutor's Office/Police or a request for an insight into the family's situation to the District Court, Family and Juvenile Division, Social Welfare Centre or sends the "Blue Card - A" form to the Head of the Intervention Team.
4. Further proceedings are the responsibility of the institutions indicated in the preceding paragraph.
5. If the suspicion of abuse is reported by the child's parents/legal guardians, and the suspicion has not been confirmed, the child's parents/legal guardians should be informed about this in writing.

§ 7

1. Written documentation shall be drawn up of the course of the intervention.
2. All employees of the school/preschool/counselling centre and other persons who, in connection with the performance of their duties have acquired information about child abuse or information related to it, are obliged to keep this information confidential, excluding information provided to authorized institutions as part of intervention activities.

Chapter IV

Principles for the protection of the child's image

§ 8

1. The school/preschool/counselling centre ensures the highest standards of protection of the children's personal data in accordance with current legislation.
2. The school/preschool/counselling centre recognizes the child's right to privacy and protection of personal rights and ensures that the child's image is protected.

§ 9

1. An employee of the school/preschool/counselling centre shall not allow any media representatives to record the image of any child (video recording, photographing, recording the child's voice) on the school/preschool/counselling centre premises without the written consent of the child's parent/legal guardian.
2. In order to obtain the consent referred to above, the employee of the unit may contact the child's guardian and establish the procedure for obtaining the consent. It is unacceptable to give a media representative any contact details of the child's guardian without the knowledge and consent of the parent/legal guardian.
3. If the child's image is only a detail of a whole, such as a gathering, landscape, public event, the consent of the parent/legal guardian is not required to record the child's image.

§ 10

1. Publicizing of a child's image recorded in any form (photograph, audio/video recording) by an employee of the school/preschool/counselling centre requires the written consent of the child's parent or legal guardian.

2. The written consent referred to in Paragraph 1 shall specify where the recorded image will be placed and in which context it will be used.

Chapter V

Principles for the children's access to the Internet

§ 11

1. When providing children with access to the Internet, the school/preschool/counselling centre is obliged to take measures to protect the children from accessing content that may pose a risk to their proper development, in particular, security software should be installed and updated.
2. On the school/preschool/ counselling centre premises, a child's access to the Internet is possible:
 - a) under the supervision of a preschool staff member during computer classes;
 - b) without teacher's supervision - on dedicated computers located on school premises (free access);
 - c) using the school's/preschool's Wi-Fi network, after providing a password.
3. In the case of access carried out under the supervision of a member of staff of the school/preschool/ counselling centre, the said member of staff has a duty to inform the children on the principles of the safe use and supervise the safe use of using the Internet.
4. Whenever possible, the person in charge of the Internet conducts periodic training sessions with children on safe Internet use.
5. The school/preschool/counselling centre provides continuous access to educational material on safe use of the Internet at computers with possible free access.

§ 12

1. The person in charge of the Internet shall ensure that the Internet network of the school/preschool/counselling centre is protected against unsafe content by installing and updating appropriate software.
2. The software listed in Paragraph 1 of this Chapter shall be updated by a designated staff member as required, at least once a month.

3. A designated staff member checks at least once a month for dangerous content on computers with free access that are connected to the Internet.
If any unsafe content is found, the member of staff shall seek to establish who was using the computer at the time it was uploaded.
4. Information about a child who was using a computer at the time of uploading dangerous content is passed on by a designated staff member to the management of school/preschool/counselling centre, who arranges for the child to speak to a psychologist or pedagogue.
5. The pedagogue/psychologist shall have an interview with the child referred to in Paragraph 4 about safety in the Internet.
6. If, as a result of the interview, the pedagogue/psychologist obtains information that a child is being abused, he/she takes the action described in Chapter III of this *Policy*.

Chapter VI

Monitoring the implementation of the Policy

§ 13

1. The person responsible for the *Policy of Children Protection against Abuse* is the Principal of the school/preschool/counselling centre, who works in partnership with his/her designated persons from the unit concerned.
2. The Principal, referred to in Paragraph 1
 - a) shall be responsible for monitoring the implementation of the *Policy*, for responding to any signals of violations of the *Policy* and maintaining a register of reports, and for proposing amendments to the *Policy*;
 - b) carries out activities monitoring the implementation of the *Policy* among the employees of the school/preschool/counselling centre;
 - c) compiles the information collected and draws up a monitoring report on this basis.
3. The Principal of the school/preschool/counselling centre makes the necessary changes to the *Policy* and announces the new wording of the *Policy* to the employees of the school/preschool/counselling centre, children and their parents/legal guardians.

Chapter VII
Final provisions

§ 14

1. The *Policy* in its consolidated form is to be implemented in:
 - a) Gdansk Autonomous High School
 - b) Gdansk Autonomous Primary School;
 - c) Sopot Autonomous High School;
 - d) Sopot Autonomous Primary School;
 - e) High International School of Gdansk
 - f) Elementary International School of Gdansk
 - g) International Preschool of Gdansk
 - h) “Osiek” Psychological and Pedagogical Counselling Centre [PPP "Osiek"].
2. The *Policy* shall be announced to the employees of the school/preschool/ counselling centre, children and their parents/legal guardians in a manner that is accessible to them, in particular, by sending the text of the Policy per email, posting it on the website and displaying it in a prominent place on the premises, including in a shortened version for children.
3. The *Policy of Children Protection against Abuse (including the Appendices)* comes into force on 14th August 2024.

Gdansk Educational Foundation Board Member

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Bożena Pawlak

Gdansk Educational Foundation Board Member

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Dorota Zagrodzka

Appendix 1

Principles for the safe recruitment of employees

1. The Principal of a school/preschool/ counselling centre, 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, leisure, medical treatment or care of pupils, is required to obtain information on whether the data of that person is included in the Register with restricted access or the Register of persons in respect of whom the State Commission for the Prevention of Sexual Abuse of Minors under 15 Years of Age has issued a decision on the entry in the Register.
2. The Principal of the school/preschool/counselling centre collects from the applicant information from the National Criminal Register on his/her lack of criminal record.
3. If the candidate is of a nationality other than Polish, he/she should also submit information from the criminal record of the country of which he/she is a national, obtained for the purposes of professional or voluntary activities involving contact with minors or information on criminal record if the law of that country does not provide for the issuing the information for the aforementioned purposes.
4. The Principal of the school/preschool/counselling centre collects from the candidate at the preliminary stage of recruitment a declaration about the country/countries (other than the Republic of Poland) in which he/she has resided in the last 20 years under pain of criminal liability.
5. If the law of the country from which the criminal record is to be submitted does not provide for the issuance of such information or does not maintain a criminal record, then the candidate shall, under pain of criminal liability, submit a declaration to that effect together with a declaration that he or she has not been convicted with enforcement and there is no other judgement against him or her stating that he or she has committed such offences and that he or she is not obliged, by virtue of a judgment of any court, other authorized body or the law, to comply with a prohibition on occupying any or certain positions, practicing any or certain professions or activities connected with the upbringing, education, leisure, medical treatment, providing psychological counsel, spiritual development, sports or the pursuit of other interests by minors or with the care of minors.

6. The following declaration shall be made under pain of criminal liability: "I am aware of the criminal liability for making false statements". This declaration replaces the authority's instruction on criminal liability for making false statements.

Appendix 2

Principles for safe relationships between the personnel of the school/preschool/ counselling centre and the pupils

The fundamental principle of all actions taken by the personnel of the school/preschool/counselling centre is to act for the benefit and in the interests of the pupil. The personnel shall treat the pupil with respect and have regard for their dignity and needs. It is unacceptable to use violence against a pupil in any form.

The principles for safe relationships between the personnel and the pupils apply to all employees, trainees and volunteers.

1. An employee of the school/preschool/counselling centre is required to maintain a professional relationship with pupils and consider each time whether their response, message or action towards a pupil is appropriate to the situation, safe, reasonable and fair to other pupils.
2. An employee of the school/preschool/counselling centre when interacting with the pupils:
 - a) refers to the pupil with respect;
 - b) listens to the pupil and tries to give a response appropriate to the situation and their age;
 - c) does not embarrass, disrespect, humiliate or insult a pupil;
 - d) does not shout unless a dangerous situation requires it (e.g. a warning);
 - e) does not disclose any sensitive information about the pupil to unauthorized persons, including a disclosure of the pupil's image.
3. The decisions concerning a pupil should take into account the safety of other pupils.
4. The pupil has a right to privacy and any waiver of confidentiality must be justified in each case.
5. An employee of a school/preschool/counselling centre is obliged to keep confidential any information obtained in connection with his/her function or work concerning the health, developmental and educational needs, mental and physical abilities, sexuality,

sexual orientation, racial or ethnic origin, political views, religious beliefs or world views of the pupils.

6. Division supervisors/ class/profile supervisors or teachers designated by the Principal are required to present the applicable *Policy* to the pupils.
7. If an employee notices a disturbing behaviour or situation, they are required to follow the Child Abuse Policy (which is a separate Appendix to the *Policy*) and inform the management of the school/preschool/counselling centre of the situation.
8. Any abusive behaviour towards a pupil is not permitted.
9. It is not permitted to push, beat, nudge etc. a pupil.
10. An employee must not touch a pupil in a way that could be misinterpreted.
11. Any physical contact with a pupil must never be undisclosed or hidden and involve any kind of gratification or result from a power relation.
12. An employee who is aware that a pupil had suffered some form of harm e.g. physical abuse, mental abuse or sexual abuse, is required to take particular care in their dealings with such pupil, showing understanding and sensitivity.
13. A necessary physical contact between the employee and the child is permitted in some justified cases. Such situations include:
 - a) assistance to a child/ pupil with disabilities;
 - b) support resulting from the need to help children in care and hygiene activities;
 - c) assistance to a pupil during Physical Education classes or other activities involving physical activity (e.g. eurhythmics, music, etc.).
14. As a general rule, the contact with children should only take place during working hours and relate to educational or upbringing purposes.
15. Meetings with the pupil or the pupil's parents/legal guardians should take place on the premises of the school/preschool/counselling centre.
16. If there is a need to contact a pupil, parent/legal guardian or a teacher out of hours, the following means of communication are allowed:
 - a) telephone;
 - b) business email;

- c) communicator adopted by the school;
- d) electronic school register.

17. In the case when an employee has a family or social relationship with a pupil or their parents/legal guardians, such employee is required to maintain full confidentiality regarding any matters concerning other pupils, guardians and personnel.

Appendix 3

Principles for dealing with child abuse

1. If an employee takes the suspicion that a child is being abused, the said employee is required to draw up a staff note and pass on the information obtained to the class teacher/pedagogue/psychologist/management (of choice) of the unit concerned.
2. The pedagogue/psychologist (of choice) informs the child's parents/legal guardians of the abuse they suspect.
3. The pedagogue/psychologist (of choice) draws up a description of the child's school/preschool and family situation on the basis of interviews with the child, teachers, tutor and parents and draws up a help plan for child.
4. The help plan for the child should include the guidance on:
 - d) undertaking by the unit action to keep the child safe, including reporting the suspected abuse to the appropriate services;
 - e) the support that the unit will offer the child;
 - f) referring the child to a specialist child welfare service if needed.
5. In more complex cases (involving sexual abuse and severe physical and psychological abuse), the management of the unit appoints an intervention team, which may include: the pedagogue/psychologist, the child's class teacher, the management of the unit, other staff with knowledge of child abuse or knowledge of the child (hereinafter referred to as the Intervention Team).
6. The intervention team draws up a plan for helping the child on the basis of the description made by the school pedagogue and other information obtained by the team members.
7. In the case when the suspected child abuse was reported by the child's parents/legal guardians, the appointment of the Intervention Team is mandatory. The Intervention Team shall summon the child's parents/legal guardians to an investigation meeting, during which it may propose to diagnose the reported suspicion at an external, impartial institution. Minutes of the meeting shall be drawn up.
8. The help plan for the child is presented by the pedagogue/psychologist to the parents/legal guardians with a recommendation to cooperate in its implementation.

9. The pedagogue/psychologist or the Head of the Intervention Team - "Blue Card" procedure informs parents/legal guardians of the school's/preschool's obligation to report suspected child abuse to relevant institution (Public Prosecutor's Office/Police or Family Court, Social Welfare Centre) depending on the diagnosed type of abuse and the intervention correlated therewith).
10. After the parents/legal guardians have been informed by the pedagogue/psychologist - in accordance with the preceding point - the management of the school/preschool submits a notice of suspected crime to the Public Prosecutor's Office/Police or a request for an insight into the family's situation to the District Court, Family and Juvenile Division, Social Welfare Centre or sends the "Blue Card - A" form to the Head of the Intervention Team.
11. Further proceedings are the responsibility of the institutions indicated in the preceding paragraph.

Appendix 4

Intervention Sheet

1. First name and surname of the child:		
2. Cause of the intervention (form of abuse)		
3. Person reporting the suspected abuse		
4. Description of actions taken by the pedagogue/ psychologist	Date	Action
5. Meetings with the child's guardians	Date	Description of the meeting
6. Form of intervention taken (please mark with a cross as appropriate)	<ul style="list-style-type: none"> • notice of suspected crime, • request for an insight into the situation of the child/family, • another type of intervention. What kind? 	
7. Details of the intervention (name of the authority to which the intervention was reported) and date of the intervention		
8. Outcome of the intervention: action taken by the judicial authorities if the school/preschool has been informed of the outcome/ action taken by the school/preschool /by the parents	Date	Action

Appendix 5

Principles for image protection

1. Our actions are guided by responsibility and consideration towards the recording, processing, use and publication of children's images.
2. Sharing photos and videos of our activities is meant to celebrate the successes of children and teenagers, to document our activities always keeping the children's safety in mind.
3. Children have the right to decide whether their image will be recorded and how it will be used by us.
4. Parents/legal guardians, at the commencement of their child's education at the School/Preschool, give their written consent to the sharing of their child's image in accordance with the School/Preschool's current GDPR policy.
5. We adopt the principle that all suspicions and concerns about the inappropriate dissemination of images of children and teenagers should be recorded and reported to the School Management, as should any other disturbing signals of risks to children's safety.
6. In the cases when images of children and teenagers are recorded by third parties and media, it is essential that the School/Preschool management has been informed and that the appropriate consent has been obtained.
7. The employees of the school/preschool/counselling centre must not allow any media representatives or any unauthorized persons to record a child's image on the premises of the unit without the written consent of the child's parent/legal guardian and the permission of the management.
8. If the parents/legal guardians have not consented to their child's image being recorded, their decision is respected. We shall agree in advance with the parents/legal guardians how the person recording the event will be able to identify the child so that the child's image is not captured in individual and group photographs. The solution we adopt will not exclude the child whose image should not be recorded.
9. Other provisions are contained in the school's/preschool's/counselling centre's internal, relevant Data Protection Policy and other GDPR documents.