

# **Child Protection Policy**

## **Minor Protection Standards**

### **at the British International School of Cracow**

In accordance with Article 22b of the Act of May 13, 2016, on counteracting threats of sexual offenses and the protection of minors, the Director of the British International School of Cracow, as of February 15, 2024, introduces the "Minor Protection Standards" (referred to as the "Standards"), the primary objective of which is to ensure the safety of minor students, care for their well-being, consider their needs, and take actions in their best interests

#### **Chapter 1**

##### **Key Terms**

1. A school employee is a person employed under an employment contract or a mandate contract.
2. A child is any person under the age of 18.
3. The guardian of a child is a person authorized to represent the child, particularly their parent or legal guardian
4. Consent of the child's parent means the agreement of both parents of the child. However, in the case of a lack of agreement between the child's parents, it is necessary to inform the parents of the need to resolve the matter through the family court.
5. Child abuse is understood as committing a punishable or a criminal act to the detriment of the child by any person or a threat to the well-being of the child.
6. The Act on Counteracting Domestic Violence defines violence against a child as a single or repeated intentional act or negligence using physical, psychological, or economic advantage, restricting or depriving the person of access to financial means or the possibility of taking up employment or gaining financial independence, violating the rights or personal well-being of the child, particularly exposing the child to the danger of loss of life, health, violating dignity, physical integrity, freedom, including sexual freedom, causing harm to the child's physical or mental health, and inducing suffering and harm significantly impacting the child's privacy or creating a sense of threat, humiliation, or distress, including actions taken through electronic means of communication. Types of violence include physical, emotional (psychological), sexual, neglect, and peer violence.
7. The person responsible for the Internet connection is a staff member designated by the school's management, supervising the use of the Internet by children within the school premises.

8. The person responsible for the Child Protection Policy is a staff member designated by the school's management, supervising the implementation of the Child Protection Policy.
9. Personal data of the child includes any information enabling their identification.
10. The Child Protection Policy is a document that organizes standards for child protection and, in subsequent chapters, describes how the institution will implement, carry out, monitor, and evaluate them.

**Standard 1:** The school has developed, adopted, and implemented the Child Protection Policy – Standards for the Protection of Minors, which specify:

1. Principles of safe staff recruitment.
2. Procedures for responding to harm.
3. Procedures and individuals responsible for receiving reports, documenting, and taking further supportive actions.
4. Principles for establishing a support plan for a minor after the disclosure of harm.
5. Principles of safe staff-minor relationships, including prohibited behaviors.
6. Principles of safe minor-minor relationships, including prohibited behaviors.
7. Rules for using electronic devices with internet access.
8. Procedures for protecting children from harmful content and threats on the Internet, including safeguarding image and personal data.
9. Principles of dissemination and evaluation of the Standards.

**Standard 2:** The school applies principles of safe employee recruitment and educated its staff to prevent child abuse.

1. As part of the recruitment process for teachers working with children, the qualifications of candidates for working with children are assessed, and their references are checked.
2. The school has obtained information about each employee from the Register of Sexual Offense Perpetrators, as well as information from the National Criminal Register and registers of criminal records of third countries concerning specific offenses (or corresponding offenses under the laws of foreign countries), or, in cases indicated by law, declarations of lack of criminal record.
3. The school has defined principles for safe relationships between teaching and non-teaching staff and children, indicating which behaviors in these relationships are prohibited and which are desirable.
4. The school has appointed a person responsible for preparing employees for the implementation of the standards.

**Standard 3:** The school has procedures in place for reporting suspicions and intervening in situations of child safety threats. The school has implemented and follows intervention procedures. Every staff member knows whom to report information about the abuse of a

minor to and who is responsible for intervention actions. The adopted Child Protection Policy is reviewed, with particular attention to analyzing situations related to the occurrence of child safety threats. As part of the policy review, the school consults with children and their parents/guardians. Contact details for local institutions responsible for preventing and intervening in cases of child abuse are available to every staff member.

**Standard 4:** The school verifies its policy at least once every 2 years, with particular emphasis on analyzing situations related to the occurrence of child safety threats, and appropriately documents the conclusions of the evaluations. Based on the conducted assessment, it adjusts standards to current needs and compliance with applicable regulations.

## Chapter 2

### General Provisions

1. The aim of the Child Protection Standards is to:
  - a. draw the attention of school staff, parents, and cooperating entities to the need for intensified efforts to protect minor students from harm;
  - b. define the scope of responsibilities of school representatives in actions taken to protect students from harm;
  - c. develop an appropriate procedure to be used during interventions in cases of suspected harm to minors;
  - d. introduce increased preventive and educational activities to ensure the protection of students from violence.
2. As part of their duties, school staff pays attention to risk factors for child abuse, monitor the situation and well-being of the child, and apply the principles outlined in the Standards.
3. The use of any form of violence against a child by staff is impermissible.
4. All teaching and non-teaching school staff, as well as students and their parents, are familiarized with the Standards in accordance with the procedures specified in the content of the Standards.
5. The Head of the school appoints a Coordinator for the protection of minors from harm as the person responsible for monitoring the implementation of the Standards, responding to signals of their violation, evaluating and modifying the provisions of the Standards, and maintaining a register of reports and interventions.

6. For overseeing the safety of devices with internet access, the Head of the school appoints an Information Technology Director (IT Director), who is responsible for the network, systems, hardware, and software used for the implementation of school's statutory tasks.

### **Chapter 3**

#### **Safe recruitment principles for employees, considering their compliance with the conditions of having no criminal record for crimes against sexual freedom and morality**

1. The standard is the recruitment of teaching and non-teaching staff in accordance with safe recruitment principles, and the employer strives for the best possible verification of the candidate's qualifications. During recruitment, consideration is also given to the candidate's alignment with the values embraced by the School, such as the protection of children's rights and respect for their dignity.
2. The School ensures that individuals employed therein—both teaching and non-teaching staff, including those working on the basis of mandate contracts, volunteers, and interns—possess appropriate qualifications for working with children and do not pose a threat to them.
3. In every case, the school must have data allowing the identification of the person employed by it, regardless of the employment basis: first name(s), last name, date of birth, and contact information of the employed person.
4. In accordance with Article 21 of the Law on Counteracting Sexual Offenses, before entering into a contract, the employer checks the candidate in the Register of Perpetrators of Sexual Offenses (a registry with limited access) and in the Register of persons for whom the State Commission for Clarifying Cases of Actions Against Sexual Freedom and Morality towards a minor under 15 has issued a decision to include in the Register (access: [rps.ms.gov.pl](https://rps.ms.gov.pl), after creating a facility profile). Checking in the offender registry is documented by a printout of feedback information generated from the Registry, and being listed in the Registry excludes the possibility of hiring the candidate.
5. The employer is obligated to require from the person employed or from every other person (e.g., volunteer, intern) before being allowed to perform activities with minors at the school, a certificate from the National Criminal Register confirming no criminal record for crimes specified in Chapter XIX and XXV of the Penal Code, in Article 189a and Article 207 of the Penal Code, and in the Act on Counteracting Drug Addiction.

6. The candidate submits a declaration stating that they have full legal capacity and exercise public rights, are not criminally convicted, and are not undergoing preparatory, judicial, or disciplinary proceedings, in accordance with the template (Attachment No. 1).
7. If the person holds citizenship other than Polish, they must provide the employer with:
  - a. information from the criminal record of the country of which they are a citizen, obtained for the purposes of professional or volunteer activities related to contact with children, or information from the criminal record if the law of that country does not provide for issuing information for the above-mentioned purposes.
  - b. under the threat of criminal liability, a statement about the state(s) of residence in the last 20 years, other than the Republic of Poland and the country of citizenship.
  - c. if they lived in countries other than the Republic of Poland within the last 20 years and the country of citizenship, information from the criminal records of those countries obtained for the purposes of professional or volunteer activities related to contact with children.
8. It is permissible for the candidate to submit, under the threat of criminal liability, a statement that the law of a given country does not provide for issuing information about criminal records and/or does not maintain a criminal register, and a statement that they have not been criminally convicted in that country.
9. The inclusion of the clause "I am aware of the criminal liability for making a false statement" in the content of the declarations attests, under the threat of criminal liability, to the submission of a false statement, replacing the instruction from the authority about the criminal liability for making a false statement.
10. Declarations, printouts from registers and certificates from the National Criminal Register (KRK) are attached to Part A of the employee's personal file or to the documentation of the volunteer/intern. In the case of data from the Register of persons for whom the State Commission for Clarifying Cases of Actions against Sexual Freedom and Morality towards a minor under 15 has issued a decision to include in the Register, a printout from the internet page stating that the person being checked is not listed in the Register is sufficient.

## Chapter 4

### **Rules ensuring safe relationships between minors and school staff, especially prohibited behaviors towards minors**

1. The fundamental principle of the relationship between minors and school staff is to act for the benefit of the student, respecting their dignity, taking into account their emotions and needs, and in their best interest.

2. The principles of safe relationships with children apply to all teaching and non-teaching staff, interns, and volunteers.

3. Basic standards defining the principles mentioned in paragraph 3 include, in particular:

a. Maintaining a professional relationship with students and responding to them in a manner that is non-threatening, appropriate to the situation, and fair to other students.

b. Not giving the student unlimited freedom, setting clear boundaries in behavior and expectations, enforcing consequences for their violation, teaching that responsibility lies with the student, and consequences result from their actions.

c. Responding appropriately to the situation and psycho-physical capabilities of the student, including adjusting the level of communication to a student with special educational needs, including students with disabilities.

d. Treating students equally regardless of gender, sexual orientation, disability, social status, cultural, religious, and worldview differences.

e. Respecting the minor's right to privacy; waiver of confidentiality is only possible if it is intended to protect the minor.

f. Physical contact with the student is only permissible as a response to the real needs of the student at that moment, taking into account their age, gender, cultural context, and situational context. However, there cannot be a universal appropriateness for every such physical contact, as behavior appropriate towards one minor may be inappropriate towards another. Therefore, one should rely on their professional judgment and pay special attention to the minor's reaction. Physical contact (e.g., hugging) must always be with the consent of the student.

g. In situations requiring care and hygiene activities towards a minor, any physical contact with the minor other than necessary should be avoided. Care should be taken to ensure that, whenever possible, another person employed in the school assists in each care or hygiene activity.

4. The following principles of communication with minors are accepted:

- a. In communication with students, maintain patience and respect.
  - b. Listen attentively and provide the student with responses appropriate to their age and the situation.
  - c. Show interest, support, and readiness for conversation.
  - d. Do not shout at the student in a situation other than one involving the safety threat to the minor or others.
  - e. If a private conversation with a student is necessary, leave the door slightly ajar and ensure that you remain within the sight of others. You can also request the presence of another staff member during the conversation.
5. Establishing rules and principles for group work, clearly defining requirements and expectations for the student, and responding decisively to undesirable behavior
  6. The staff member maintaining control over their own emotions.
  7. It is prohibited to enter into any romantic, sexual, or any relationship with a minor that could be considered as having such properties. This also includes comments, jokes, and gestures with a sexual undertone.
  8. Special care should be taken with children who have experienced abuse and harm, including sexual, physical, or neglect. Such experiences can sometimes lead a child to seek inappropriate or inadequate physical contact with adults.
  9. Interaction with students for educational purposes should only occur during school hours. If there is a need to meet with students outside of working hours, informing the school management and obtaining the consent of the minor student's parents is mandatory.
  10. If a student or their parents are close to an employee with whom they have social or family relationships, the employee maintains confidentiality regarding all information about other students, their parents/guardians, confirmed by signing a relevant statement (Appendix No. 2).
  11. It is not allowed to maintain social contacts with minors attending school through computer networks and external applications. Permissible forms of communication with minors and their parents/legal guardians are official channels.
  12. In particular in the relationship between staff and minor students, the following are prohibited:

- a. Using violence against the student in any form, including physical punishment, exploiting power relations, or physical superiority;
- b. Humiliating, demeaning, mocking, or insulting students.
- c. Shouting at students, causing fear.
- d. Touching the child in a manner that may be deemed indecent or inappropriate.
- e. Disclosing sensitive information (image, information about family, medical, legal situations, etc.) about the child to unauthorized persons, including other students;
- f. Offering alcohol, tobacco products, or illegal substances to minors, as well as using them in the presence of minors;
- g. Behaving inappropriately in the presence of students, such as using vulgar language, making offensive remarks, inappropriate jokes, and comments;
- h. Favoring students;
- i. Recording the image of the child (filming, recording voice, taking photographs) for the employee's private needs.
- j. Initiating contacts with students through accepting or sending invitations on social media.

## **Chapter 5**

### **Rules and procedures for intervention in cases of suspected harm or possession of information about the harm to a minor**

1. The school standard includes.
  - a. Training all staff in the legal and social obligation to report to institutions the possibility of committing a crime, with particular emphasis on crimes against minors; regarding the role of education professionals in preventing domestic violence and in recognizing risk factors for child abuse.
  - b. Providing all staff with a list of contact information for local support facilities dealing with child protection and providing assistance in situations threatening life or health, and cooperating with these institutions (e.g., social welfare center, child support centers, support centers, non-governmental organizations, police, family court, crisis intervention center).



- c. The person identified in Chapter 2, paragraph 5 of the Standards, conducts the Intervention Progress Card (Annex no. 3) and the Register of Events Endangering the Welfare of Minors (Annex No. 7).
2. School staff pays special attention to signs of harm to minors, especially the possibility of committing crimes against their sexual freedom and morality. The school staff should pay attention to the following behaviors.
  - a. Minors have visible bodily injuries (bruises, burns, bites, etc.) that are difficult to explain.
  - b. Unwillingness to participate in activities involving physical exercises.
  - c. Minors excessively cover their bodies (inappropriately for the weather).
  - d. Minors flinch when approached by an adult.
  - e. Minors are afraid of the parent/legal guardian.
  - f. Minors are withdrawn, submissive, frightened.
  - g. There is a sudden and clear change in the minor's behavior.
3. For the purposes of the Standards, intervention procedures have been developed in case of revealing actions harmful to a minor student in the form of:
  - a. Peer violence.
  - b. Domestic violence.
  - c. Actions harmful to the child by school staff.
  - d. The school organizes preventive actions in preventing violence, including cooperation with extracurricular institutions
  - e. The procedures mentioned in paragraph 3 constitute Attachment 4 to the Standards.

## **Chapter 6**

### **Individuals and procedures responsible for reporting suspicions of committing a crime against a minor, notifying the guardianship court, and initiating the "Blue Card" procedure.**

1. The head of the school is the person responsible for reporting suspicions of committing a crime against a student and notifying the guardianship court
2. In the event that a school employee becomes aware that a child may be harmed, the disclosing person prepares an official note with the obtained information, findings, and forwards the information to the person mentioned in paragraph 1 who then creates an

event documentation card. Further proceedings are carried out in accordance with the procedures described in Chapter 5.

3. The person responsible for initiating the "Blue Card" procedure (completing the "Blue Card - A" form) is the person indicated in section 1, the teacher-form tutor, a teacher familiar with the minor's home situation, a school counselor or a school psychologist.

4. In the event of a threat to the health or life of the child or their closest person, the disclosing person immediately calls the emergency number 112.

5. All school employees who, in the course of performing their duties, become aware of harm to a student or related information, are obliged to keep this information confidential, except for the information that is provided to authorized institutions.

## **Chapter 7**

### **Principles ensuring safe relationships among minors, particularly prohibited behaviors.**

1. The fundamental principle of relationships among minor students is to act with respect, taking into account the dignity and needs of minors

2. It is standard to create a school life atmosphere that promotes tolerance and a sense of responsibility for one's behavior.

3. Students are engaged in activities where they have the opportunity for active participation, cooperation, and the development of a collaborative approach, including fostering positive relationships with students with special educational needs.

4. Prohibited behaviors include, in particular.

a. using violence against any student, in any form;

b. humiliating, insulting, or offending other students;

c. behaving in an inappropriate manner, such as using vulgar words, gestures, jokes, making offensive comments, including those with a sexual connotation;

d. using threats and intimidation;

e. perpetuating the image of other students by recording and photographing without consent and in situations that may cause embarrassment.;

f. sharing psychoactive substances among minors and using them in their environment.

## **Chapter 8**

### **Rules for using electronic devices with internet access.**

1. The school's network infrastructure provides internet access to both staff and students, both during supervised school activities and outside them, on designated computers located in classrooms, the school library, the staff room, and the office

2. When using equipment with internet access under the supervision of school staff, there is an obligation to inform students about the rules for safe use of online resources and to oversee the safe use of the internet during classes.

3. The school carries out preventive actions to promote safe internet usage.

4. The school premises have a wireless internet network secured with a password.

5. In case of discovering dangerous content, the IT system administrator tries to determine who used the computer at the time the content was introduced and communicates their findings to the head of the school, who arranges for the child to have a conversation with a psychologist or school counselor in accordance with established procedures.

6. Safe internet use in school includes the following rules, which minors are informed about by school staff.

a. Do not disclose personal information;

b. Do not spread your image, do not share your photos – especially with unfamiliar individuals;

c. If you come across online content that causes concern or seems illegal, inform your parents or guardian;

d. Always inform your parents about meeting proposals received from online friends;

e. Do not attack anyone online, do not judge, do not make threats;

## **Chapter 9**

### **Procedures for protecting children from harmful content on the Internet and recorded in other forms**

**I. Dangerous Content (pornographic materials, promoting hate, racism, xenophobia, violence, self-destructive behaviors)**

1. Illegal or non-compliant content on a given site is reported to the site administrators.

2. In the case of a report about access to inappropriate content, the network administrator investigates the circumstances, attempts to identify the perpetrator and witnesses, secures evidence, and configures school network security to block access to inappropriate content. The findings are documented in an Intervention Record (Annex No. 3).

3. If dangerous content involves individuals not affiliated with the school, the head of the school reports the incident to the appropriate authorities, who secure the materials.

4. If students are involved, a separate conversation with a school psychologist or counselor is conducted with the perpetrator and the victim regarding the emotions the material may evoke, the behaviors it encourages, and the consequences of the incident resulting from the violation of school law.

5. Parents of the students are notified, informing them of the findings and the school's further actions (applied statutory punishment/educational measures, notification to law enforcement, psychological and pedagogical support).

6. Cooperation with law enforcement or family court is mandatory in the case of a violation of the ban on disseminating pornographic materials involving and publicly promoting fascist or other totalitarian regimes, or inciting hatred based on differences in nationality, ethnicity, race, or religion.

## **II. Image Protection**

1. Upon admission of new students to the school, written consent from parents is obtained for the publication of students' images for the purpose of photographic documentation of activities. Whenever possible, photos are taken of groups of students rather than individuals

2. Photos and recordings are not labeled with information allowing the identification of the student by name

3. It is unacceptable to store photos and recordings with students' images on unencrypted or mobile media (cell phones and USB drives)

## **III. Violation of Privacy**

1. Information about the threat of privacy violation at school should be promptly conveyed to the IT systems administrator and the head of the school, who take immediate actions to secure data and limit further access to confidential information.

2. In cases of more serious threats and situations where privacy violation is caused by individuals outside the school, collaboration with law enforcement should be initiated.

3. The person identified in Chapter 2, paragraph 6, notifies the individuals affected by the incident (whose personal data has leaked) about the situation, so they can take individual remedial measures.

#### **IV. Cyberbullying**

1. A student who has become a victim or witness of cyberbullying (mocking, humiliating members of the school community using digital technologies, offensive comments, spreading images, manipulating photos, etc.) should report the situation to the class teacher or school counselor/psychologist. Reports can also be made by witnesses of cyberbullying.

2. The teacher receiving the information tries to establish the circumstances of the incident, collect evidence in the form of screenshots, messages, comments, photos, website addresses. The collected materials are handed over to the person identified in Chapter 2, paragraph 5, who prepares an Intervention Record.

3. Parents are informed about the incident, and together with the IT systems administrator and the Standards coordinator, they determine whether the situation requires notifying law enforcement and whether the responsibility lies with the parents or the school.

4. The school counselor/psychologist provides psychological and pedagogical assistance to the victim, explaining the school's role in combating cyberbullying.

5. If the perpetrator is a student of the school, the school counselor or psychologist should have a conversation with them to determine whether there are grounds for reporting the case to the family court or the police (crimes prosecuted ex officio) or whether the use of educational measures will be sufficient.

#### **V. Fake News**

1. Including the issue of misinformation in the topics of preventive activities, also within the framework of computer science classes, to support media literacy skills.

2. Monitoring social media for activities aimed at limiting the spread of fake news and checking the content published online – the person responsible for managing the school's Facebook and the school website administrator.

3. Responding to potential threats – correcting information, reporting to the website administrator if the content is illegal or non-compliant with the regulations.

## Chapter 10

### Guidelines for Establishing a Support Plan for a Minor after Disclosure of Abuse

1. The support plan primarily aims to:
  - a. Initiate intervention actions in collaboration with other institutions if necessary;
  - b. Collaborate with parents to stop harm to the minor and provide assistance;
  - c. Assess whether legal actions are necessary;
  - d. Provide the student with psychological and educational support within the school and specialized assistance outside the school if necessary.
2. The student, their parents, the guardian, and the psychological-educational support team participate in establishing the support plan.
3. The actions are monitored by the person responsible for coordinating the Standards, as indicated in Chapter 2, paragraph 5.
4. The support plan includes:
  - a. Intervention actions to ensure the student's safety, including reporting suspicions of criminal activity to law enforcement;
  - b. Forms of support offered by the school
  3. Proposed forms outside the school if needed
5. The support plan should also cover the siblings of the affected student if they attend the same school.
6. The support plan for the minor operates parallel with intervention actions. Its fundamental principle is to observe the student, provide conditions for obtaining multi-disciplinary assistance, including extracurricular support, support parents, and facilitate inter-institutional cooperation.
7. The support plan for the minor is also established when intervention actions are initiated by another institution (the "Blue Card" procedure, receiving information about harm from law enforcement or the court, etc., cooperation with Family and Guardianship Support Centers).
8. In the case of implementing the "Blue Card" procedure, the support plan for the minor aligns with the findings made in the diagnostic-support group.
9. The "non-abusive" parent, cooperating with the school to stop the perpetrator's violence and provide the child with help outside of school, should be urged to act. In the

case of harm by both parents, intervention also involves notifying the family court and the police and taking action against the parents. Ensuring the safety of household members falls within the competence of these institutions.

10. The tasks of school staff mainly involve assisting the student in carrying out educational tasks and building positive relationships with peers and school staff.

## **Chapter 11**

### **The principles and method of providing employees, minors, and their legal guardians with policies for familiarization and implementation as well as for updating and reviewing the Standards.**

1. All procedures and documents related to the introduction of Standards are made available to employees, minors, and their parents during familiarization and commitment to implement (in accordance with the principles below) and then upon request at any time.

2. Each employee is obligated to familiarize themselves with the Standards immediately upon employment, and the acknowledgment of familiarity and commitment to implementation is confirmed by submitting a relevant statement.

3. Parents/legal guardians of students are acquainted with the Standards in the month of September each year, with the initial introduction occurring promptly after the development and introduction of the Standards. Confirmation of familiarity with the above-mentioned documents is made by the signature of each individual on the statement.

4. Students are introduced to the Standards during lessons with form tutors conducted in the month of September each year, with the initial introduction taking place promptly after the development and introduction of the Standards. The attendance list for classes during which these procedures were discussed, serves as confirmation of the familiarity with the documents.

5. The content of the statements for employees is provided in Annex No. 5 to the Standards.

6. Employees appointed to perform functions in accordance with the provisions of Chapter 2, paragraphs 5-6, continuously monitor and periodically verify the compliance of their activities with the adopted principles of child protection, conducting assessments of the Standards at least once every two years to adapt them to current needs and applicable regulations. Conclusions from the conducted assessment are documented in the form of official notes, and changes to the Standards are introduced through annexes.

7. The person mentioned in Chapter 2, paragraph 5, conducts a monitoring survey among employees, parents, and students at least once every two years, to monitor the level of Standards implementation – Annex No. 6. Subsequently, a qualitative and quantitative analysis of the survey is carried out, and a report is prepared based on this, which is then submitted to the Head of the school.

8. Monitoring and evaluation of the Standards, as mentioned in paragraph 6, are conducted based on the analysis of internal documentation and inter-institutional correspondence, legal provisions, observation, quantitative and qualitative analysis of reports, surveys as mentioned in paragraph 7, risk factor diagnosis, and consultations with school authorities.

9. The changes introduced in the Standards are approved and presented to employees, parents/legal guardians, and students by the Head of the school.

## **Chapter 12**

### **Final Provisions**

1. The Standards come into effect on the day of announcement.
  2. The announcement is made by posting the documentation comprising the Standards on the school's website.
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