



## **Child Protection Policy**

### **Cluster of Social Innovations**

#### **TABLE OF CONTENTS**

##### **I INTRODUCTION**

Preamble

About the Foundation

Goals of Child Protection Policy

Definition of basic concepts

Hurting children

4

##### **II ORGANIZATION OF THE CHILD RIGHTS PROTECTION PROCESS AND PREVENTION OF VIOLATIONS**

General principles

Rules for safe contact with children

Principles of protection of children's image and personal data

Principles of safe internet access as part of the Foundation's activities

Education and training activities for employees and associates

Recruit new employees and associates for the Foundation

9

##### **III PROCEDURES AND POLICIES FOR DEALING WITH SUSPECTED CHILD ABUSE**

10

Procedures for reporting suspected child abuse

10

Intervention in case of suspected child abuse by an employee/co-worker

11

Intervention in case of suspected child abuse by other third parties

12

Intervention in case of suspected child abuse by parents/legal guardians

Intervention in case of suspected child abuse by a peer - another child

12

##### **IV POLICY IMPLEMENTATION AND MONITORING**

14



## I INTRODUCTION

### Preamble

In the responsibility we assume, we emphasize providing an environment that is safe, supportive and free of all forms of violence for every child with whom we work. We are committed to protecting the physical, mental and emotional well-being of children who are participants or beneficiaries of our programs, projects and any initiatives carried out by the Cluster of Social Innovations.

This policy is the foundation of our work, emphasizing the value and right of every child to safety. We operate transparently and ethically, always with the best interests of the child in mind.

By implementing this policy, we are committed to continuously monitoring and improving our practices to ensure a safe environment for children. We are determined that our actions reflect the highest level of respect and protection of children's rights.

### About the Foundation

The Cluster of Social Innovations, in operation since 2015, focuses its efforts on supporting the active role of young people in society, with a strong emphasis on protecting and promoting children's rights. Through a variety of initiatives, such as international exchanges, mobility, leadership programs, engaging campaigns, training and volunteering, the Foundation seeks to equip people regardless of age, gender, sexual orientation, background with the key competencies, skills and tools necessary for successful development.

The Cluster of Social Innovations places special emphasis on:

- Promoting volunteerism among children and youth and the elderly,
- Development of non-formal and informal education, increasing social and cultural awareness,
- Ecology and environmental protection activities, teaching responsibility for the planet,
- Developing digital skills to prepare young people for the challenges of the future,
- Supporting educational, cultural and social initiatives that contribute to a richer community life,
- Supporting people with fewer opportunities, providing them with equal access to upbringing and education,



- Promoting intercultural contacts, democracy, respect for diversity and freedom of expression,
- Supporting the development of civil society and cultural and social activities;
- Equalizing opportunities and overcoming barriers for groups at risk of social exclusion, especially people with disabilities and minorities.

### **Objectives of the Child Protection Policy**

The policy is designed to protect children participating in the Foundation's activities from any harm they might suffer while working with the Foundation, including harm resulting from:

- The behavior of employees and those who cooperate with the Foundation,
- activities of those participating in projects implemented by the Foundation as its beneficiaries,
- The process of preparing and implementing initiatives implemented by the Foundation.

The Child Protection Policy of the Cluster of Social Innovations presents a framework of principles, standards and guidelines to:

- Take appropriate action in the event of suspected child abuse and/or imminent danger to children's health and lives,
- Establish educational, preventive and intervention activities to ensure children's safety,
- Increase awareness among all employees and those working with the Foundation of the importance of activities directed at protecting children from abuse,
- To determine the responsibilities of individuals for the safety of children in the care of the Foundation,
- Promoting in the organization a work culture based on children's rights and continuous improvement.

The Child Protection Policy applies to all employees, associates, volunteers of the Foundation, as well as its partners and grantees. Familiarization with and practical application of the Child Protection Policy is a moral and professional obligation for every employee, associate and volunteer of the Foundation.

The Child Protection Policy is the foundation for building a safe environment for the children the Foundation encounters. It demonstrates an understanding of and commitment to protecting the youngest from all forms of harm, which should be a priority for anyone working within or on behalf of the Foundation.



## Definition of basic terms

**Foundation** - Cluster of Social Innovations

**A child** - according to the UN Convention on the Rights of the Child and for the purposes of this global policy - is defined as any person - girl, boy, young woman, young man and children of other gender identities - **under the age of 18** (Article 1 of the UN Convention on the Rights of the Child).

**Foundation employee** - a person employed by the Foundation under an employment contract.

**Associate of the Foundation** - any person performing tasks for the Foundation on a basis other than an employment contract, i.e. performing tasks on the basis of a civil law contract or other cooperation agreements, including in particular: subcontractors, volunteers, trainees, apprentices, consultants, trainers, persons visiting the Foundation as part of exchange or cooperation programs.

**Legal guardian of the child** - the child's parent or legal guardian; under this policy, a legal guardian is also a foster parent.

**Consent of the child's legal guardian** - the consent of the person entitled to represent the child, in particular, his legal representative (parent, legal guardian) or other person entitled to representation under specific legislation or court decision. In the case of parents means the consent of one of them. In the absence of an agreement between the parents of the child, the case shall be decided by the court

## Harming children

According to D.G. Gill's definition, child abuse is any intentional and unintentional act or failure to act by individuals, institutions or society as a whole, and any effect of such action or inaction that violates the equal rights and freedoms of children and/or interferes with their optimal development. There are **5 types of violence** against children:

### PHYSICAL VIOLENCE

Any deliberate use of physical force against a child that causes or is likely to cause physical injury, endangering the child's health, development or dignity.



### **MENTAL/EMOTIONAL VIOLENCE**

Prolonged interaction to the detriment of the child, not revealed through direct physical contact, which negatively affects the child's development. It can take the form of actions as well as inactions. This type of behavior includes **verbal aggression, yelling, rejection, isolation of the child, threats, developmentally inappropriate interactions with the child, etc.**

### **SEXUAL ABUSE**

It encompasses any activity that involves a child in an activity of a sexual nature to satisfy the sexual arousal of an adult. Sexual abuse can occur both with and without physical contact, and includes activities such as exhibitionism, pornography, obscene phone calls or verbal harassment.

### **DISCLAIMER**

Chronic or incidental failure to meet a child's basic needs, both **physical** needs such as adequate nutrition, clothing, health care, education, and **psychological** needs such as providing a sense of security, love and care.

### **COMMERCIAL OPERATION**

Exploitation of the child in work or activities for the benefit of others, in a manner detrimental to the child's physical or mental health, education, moral or social-emotional development.

## **II ORGANIZATION OF THE CHILD RIGHTS PROTECTION PROCESS AND PREVENTION OF VIOLATIONS**

### **General principles**

The organization's employees are knowledgeable and pay attention to the risk factors of child abuse as part of their duties. Employees and colleagues constantly monitor the situation and welfare of the child.

The communication practices of the Foundation's staff, associates and volunteers are based on a deep respect for the child's individuality, dignity and rights, paying particular attention to the child's right to protection from harm. All communication with the child is undertaken with respect for the child's right to privacy.



In the event that the child himself starts a private conversation using social media, the employee/co-worker shall not continue the conversation and shall instruct the child to report to her/him at his/her place of work or using official remote communication channels. This rule does not apply to situations of (even potential) danger to the child's life and health. In such a case, the employee/co-worker may continue the conversation, but at the same time is obliged to notify the supervisor or the organization's management about the contact with the child and the reasons for this contact.

Involving a child in all activities organized by the Foundation is done after obtaining the consent of the child and his legal guardians. All interactions with children by staff, associates and volunteers require the children's consent. The same representatives of the Foundation provide clear information to both parents and children about the types of support that are available and what the child can expect during their activities within the Foundation. Messages to children are tailored to their age and level of understanding.

If risk factors are identified, the organization's employees/co-workers who are in direct contact with the child/family engage in a conversation with the parents, providing information on available support and motivating them to seek help for themselves. If risk factors are identified within the organization, employees and co-workers communicate this information to the organization's management.

The Foundation ensures that all initiatives, policies and processes regarding the protection of children and young people meet the criteria of equality and non-discrimination. It is recognized that girls, boys, young women and young men, as well as children and adolescents who identify with different gender identities, may face a variety of risks regarding their safety and security.

In our actions, we ensure that every child and young person is equally protected and treated regardless of their age, gender, gender identity, sexual orientation, nationality, ethnicity, color, race, language, religious or political beliefs, marital status, disability, physical or mental health, family background, socioeconomic or cultural status.

Employees and co-workers are required to relate to children and youth using inclusive language to show respect for the child's individuality, different beliefs, different experiences, different perspective resulting from being a child. Employees and associates are required to use language that is devoid of judgments, labels, and adapted to the child's developmental level. At the Foundation, we foster a culture of openness and mutual accountability conducive to raising and discussing any child protection issues and concerns.



### **Rules for safe contact with children**

It is forbidden for employees and persons cooperating with the Cluster of Social Innovations to take the following actions against children:

- any conduct that leads to feelings of shame, humiliation, degradation or humiliation among children, or bears the characteristics of psychological violence, physical violence or sexual abuse,
- maintaining contact with children through private communication channels without the knowledge of their legal guardians, in particular, having private conversations with children using social media,
- Inappropriate touch towards the child, which may violate the child's dignity,
- Accepting or participating in illegal activities involving the child,
- Accepting the consumption or supplying the child with alcohol, medicine or any psychoactive substances,
- Presenting behavior with sexual overtones,
- Interacting of a sexual nature with children,
- Hosting a child in their own home,
- escorting or being with a child on a trip without the child's guardian present,
- Sharing a room with a child during an away workshop.

### **Rules for the protection of children's image and personal data**

In the context of our Foundation engaging children and young people in workshops and other activities, the protection of the image and personal data of participants is a key element of our child protection policy. In order to effectively protect the image and personal data protection aspects of children involved in workshop activities and other activities conducted by our Foundation, we have adopted a number of policies and procedures that are strictly followed by all employees, associates and volunteers of the Foundation.

Our operations are based on strict principles of protecting children's personal data, which are in accordance with the Law of May 10, 2019 on the Protection of Personal Data and the Regulation of the European Parliament and of the Council (EU) No. 2016/679 of April 27, 2016, also known as the General Data Protection Regulation (GDPR). This legal foundation provides robust protection of



personal data in the context of its processing and free movement, referring to the previously existing Directive 95/46/EC. Within our Foundation, every initiative involving children and young people is subject to thorough information about the purposes and methods of processing their personal data. We ensure that all employees comply with their obligation to keep this information confidential and protect it from unauthorized access, which is in accordance with our internal personal data security policy. We always act in accordance with the key principles of the RODO, including the principle of data minimization, which means that we only collect and process data that is necessary for our purposes.

Before publishing any material (photos, videos) depicting children, **written consent** is required from their parents or legal guardians. This consent should be specific and inform about the context of the use of the material, the place of publication and the time for which the consent is given.

In materials published by the foundation, where possible, we aim to preserve the anonymity of children, for example by avoiding the publication of full personal details such as first and last names, or by using visual techniques that prevent recognition of identity if necessary.

Any photos taken during the activity, as well as any other material capturing the image of children, may only be taken with the Foundation's service equipment and should not include the image of children in provocative poses or incomplete clothing, preserving his right to respect for dignity. We make sure that any image or recorded story of a child does not make him vulnerable to any form of abuse or violence.

### **Principles of safe access to the Internet as part of the Foundation's activities**

During the course of projects, workshops and activities conducted by our Foundation, all tablets used by children, as well as the public networks in our offices, are equipped with appropriate security measures. These security measures prevent access to inappropriate content, such as material containing nudity or violence, ensuring a safe educational environment. In addition, the Foundation periodically updates software that protects children from accessing content that may pose a threat to their proper development.

Children's use of equipment belonging to the Foundation is under the supervision of a Foundation employee or a person cooperating with the Foundation.





If a situation arises where a child encounters harmful content using an electronic device provided by the Foundation or while using the Foundation's public network, an employee or associate of the Foundation shall immediately report the incident to the Child Protection Policy Coordinator, who shall subsequently notify the child's legal guardian.

### **Education and training activities for employees and associates**

All employees and associates of the Foundation receive training in the organization's Child Protection Policy, with particular emphasis on procedures for reporting suspected child abuse. Children participating in the Foundation's programs may also receive training in this area.

The attendance of employees and associates of the Foundation at child protection training sessions is documented by signing the attendance list. This list, at the end of the training, shall be handed over immediately to the person responsible for the implementation of the Policy, and this is handled by the trainer - Child Protection Policy Coordinator.

The Foundation organizes educational programs for its employees and associates at least once a year, or provides access to in-house training. These trainings, conducted by the Child Protection Policy Coordinator, focus on protecting children from abuse and supporting children in situations where abuse is suspected.

### **Recruitment of new employees and associates of the Foundation**

The Foundation shall take all possible measures to recruit persons who have the appropriate qualifications and skills to work with children and are safe for them, and who share the values of the Convention on the Rights of the Child, with particular regard to the child's right to protection from harm. In order to verify the above, the Foundation may request from those participating in the recruitment process data on education, professional qualifications, previous employment history and, if possible, references. Already at the stage of this interview, candidates are informed of the Foundation's Child Protection Policy.

All candidates participating in the recruitment process for positions involving contact with children, before entering into an employment relationship with the Foundation, and in the case of co-workers,



before being allowed to perform tasks, are checked in the Sex Offender Registry and are required to submit declarations regarding no criminal record for offenses against a minor, and about pending criminal proceedings against him or her. The Foundation archives evidence of verification of a person's data in the Sexual Offender Registry, adding a printout of information from this registry to the personnel file - in the case of employment of an employee under an employment contract, or to similar documentation (e.g., personnel files) - when it is a person cooperating with the Foundation. Analogously, statements are kept about not having a criminal record for offenses against a minor, and about pending criminal proceedings against him.

Newly hired employees and co-workers are introduced to the Child Protection Policy and trained in respecting children's rights and personal data protection by the Child Protection Policy Coordinator. They are also acquainted with the detailed work regulations, rules regarding children's rights, as well as the procedures for the protection and processing of personal data that apply at the Foundation. Familiarization with and acceptance of these rules is confirmed by their signature on a statement included in the contract forming the basis of employment.

### **III PROCEDURES AND POLICIES FOR DEALING WITH SITUATIONS OF SUSPECTED CHILD ABUSE**

#### **Procedures for reporting suspected child abuse**

All employees and associates of the Cluster of Social Innovations are committed to ensuring the protection of children from all forms of abuse. In doing so, they are guided by the laws in force in Poland. Each case of suspected child abuse is treated with due seriousness and subjected to a detailed analysis, regardless of the source of the report - whether it comes from the child himself, a caregiver, a professional, and in the case of suspected abuse by another child, a caregiver, a professional, employee or associate of the Foundation.

In a situation of suspected child abuse, all employees and persons working with the Foundation must immediately notify their supervisor, the Board of Directors or the Child Protection Policy Coordinator of the incident. When notifying the person in charge of the Policy, the report can be made in person or electronically by sending an email to: [kontakt@klaster.org.pl](mailto:kontakt@klaster.org.pl). When the notification is addressed to a supervisor or member of the Board of Directors, it can be made directly or electronically by sending an email to the personal address of the person to whom the notification is addressed. If the report is



made verbally, the person receiving the report is obliged to make an official note relating to the report and send it immediately, along with all the information collected, to the e-mail address: kontakt@klaster.org.pl.

Any intervention action begins with notifying the child's legal guardian or custodian of the suspected harm to the child, unless such action could jeopardize the child's welfare.

In the event of an imminent threat to a child's life or health, an employee or co-worker who has obtained such information shall immediately intervene by immediately notifying by telephone the notification of an imminent threat or violation of a child's life and health to the appropriate police unit. All activities related to the intervention are documented and stored in a special digital folder using online tools and services such as Google Drive, as well as recorded in an electronic reporting record system.

The Foundation's employees and cooperating individuals involved in intervention activities - regardless of their role within those activities, whether as a reporter, a person affected by a report, or a witness to an incident - are required to maintain the confidentiality of all information related to the incident and the child.

### **Intervention in case of suspected child abuse by an employee/co-worker**

Upon receipt of information about possible child abuse by a Foundation employee or co-worker, that person is immediately excluded from any possibility of contact with children (not just the one who may have been harmed) until the matter is clarified. The Child Protection Policy Coordinator is informed of the incident and provides the organization with appropriate guidelines and recommendations.

The organization's management interviews the child and other people who may have information about the incident and the child's personal (family, health) situation, trying to determine what happened and assess the impact of the incident on the child's mental and physical state. The conclusions of these discussions are documented on the intervention sheet.

The Board holds meetings with the child's guardians to provide them with information about the incident and discuss the possibility of seeking specialized support, including from other organizations or services. Notes of the meeting are forwarded to the Child Protection Policy Coordinator.



If a crime has been committed against a child, the Foundation's management shall inform the relevant police unit or prosecutor's office.

When an employee has committed another form of child abuse that is not a crime, the organization's management investigates the circumstances of the incident, including listening to testimony from the employee or co-worker suspected of abuse, the child, and other witnesses. If the violation of the child's welfare is serious, such as discrimination or violation of the child's dignity, the termination of cooperation with the person responsible for the abuse should be considered or recommended to his superiors. If the person who committed the abuse is employed by an external entity, suggest banning him or her from the organization's premises or consider terminating the contract with the institution that employs him or her.

### **Intervention in case of suspected child abuse by other third parties**

When a child is suspected of being harmed by third parties, that is, people outside the immediate family or care circle, the organization takes specific intervention steps to protect and support the child. The first step is to verify the report in detail and gather as much information about the situation as possible, so that the context can be understood and the best course of action can be determined.

It is crucial to respond quickly to minimize the risk of further harm to the child. To this end, the foundation can partner with relevant institutions, such as social services, psychological support centers or the police, to provide the child with a safe environment and the necessary care. The organization's staff can also interview the child and his family to understand the child's needs and jointly develop an action plan to protect the child from further harm.

Depending on the nature and severity of the situation, the organization may decide to take legal action, including filing a formal report with law enforcement, if the behavior of third parties constitutes a crime. In such cases, the priority is to work with the police and other authorities to ensure that perpetrators are held accountable.



### **Intervention in case of suspected child abuse by parents/legal guardians**

When there is a suspicion that a child is being harmed by his or her parents or legal guardians, the organization takes a series of interventions to protect the child's welfare. The first step is to conduct an initial assessment of the situation to understand the context and seriousness of the allegations. The organization then initiates contact with the child's parents or guardians to discuss the situation, while remaining fully diplomatic and attentive to the child's welfare.

In dialogue with parents or guardians, it is crucial to identify the best next steps, which may include supporting the family in resolving the problems that contributed to the suspected abuse. The organization can suggest the use of appropriate forms of psychological, therapeutic or specialized support to address both the needs of the child and the family.

If necessary, the Foundation is required to use external services, such as social services, child psychologists or other institutions specializing in the protection of children's rights, for additional support and intervention. All actions are documented, and decisions are always made with an emphasis on protecting and promoting the best interests of the child.

In extreme cases, when direct action with parents or guardians does not work, or when there is an imminent threat to the child's health, or life, the organization is forced to notify the appropriate legal authorities, including the family court or the police. Such a step is always considered a last resort when other attempts to resolve the situation in a less invasive manner have failed, or when the child's right to safety is clearly violated.

### **Intervention in case of suspected child abuse by a peer - another child**

When there is a suspicion that a child is harming another child, it is necessary to talk to the parents or guardians of both the suspected child and the child himself, provided his psycho-physical development allows it. Together with the parents or guardians, a plan of action should be established to rectify the situation. At the same time, a strategy should be developed with the parents or guardians of the harmed child to ensure his or her safety, including methods to protect him or her from potential danger.

In addition, every step should be taken to ensure that a child suspected of injuring another is not himself the victim of harm by parents, guardians, other adults or children.

In cases where the suspected abuser is a child between the ages of 13 and 17, and his actions can be classified as a crime, an interview with the parents of both the suspected child and the victim is required, as well as notification of the relevant family court or the police through a written report.

If the suspected abuser is a child over the age of 17, and his conduct constitutes a crime, it is necessary to notify the relevant police unit or prosecutor's office in writing.

#### **IV POLICY IMPLEMENTATION AND MONITORING**

The Child Protection Policy of the Cluster of Social Innovations takes effect immediately upon its publication in full form by the Board of Directors of the Foundation on platforms where it is easily accessible to all employees and associates of the Foundation, as well as upon its publication on the official website <https://www.klaster.org.pl/>.

The Board of Directors of the Foundation appoints a Child Protection Policy Coordinator, responsible for overseeing the implementation of and compliance with the Child Protection Policy, including:

- Organization and coordination of introductory and periodic training on child protection policies, for employees and associates of the Foundation,
- implementation of a biennial survey to verify the effectiveness and relevance of the Child Protection Policy and the degree of awareness of it among the Foundation's employees and associates,
- Conducting regular consultations with Foundation staff and associates.

Based on the results of these consultations and surveys, every two years, or more often if the need arises or if the laws regarding the issues discussed in the Policy change, the coordinator may propose a revision of the Policy. The purpose of such revision is to ensure that the provisions of the Policy are as effective and relevant as possible. Any proposed changes are then presented to the Foundation's Board of Directors for approval. In the case of significant modifications, the Board consults with the Foundation's Council before making final decisions. The introduction of any changes to the Policy always involves announcing them to all employees and associates of the Foundation.

14  
