Child Protection Standards (Standards for the Protection of Minors)

This English text is a translation provided for information purposes only. In the event of any discrepancy or difference in interpretation between the Polish and English versions, the Polish version shall prevail.

Your Path Academy (Warsaw, 15 December 2024)

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I. Basic information about the Standards

1. The Child Protection Standards cover four areas:
    1. the Child Protection Policy, which sets out:
        a. the rules for the safe recruitment of staff,
        b. the rules for safe relationships between staff and minors,
        c. the requirements for safe relationships between minors, and in particular prohibited behaviour;
        d. the rules for responding in cases where harm to a minor is suspected;
        e. the rules for protecting a minor’s image and a minor’s personal data,
        f. the rules for the safe use of the Internet, including social media,
        g. the rules for making the Standards available;
    2. Staff, with regard to:
        a. compliance with the rules of safe recruitment in accordance with the obligation laid down in the Act;
        b. participation in training on the Standards and engagement with this subject;
    3. Intervention procedures, with regard to:
        a. free access to the procedures;
        b. participation in training on recognising the symptoms of violence;
        c. knowledge of centres providing free support in this area;
    4. Monitoring, with regard to:
        a. assessing the compliance of the Standards with the law,
        b. assessing the Standards in the light of current needs,

c. rules for documenting the assessment of the actions taken.

2. Out of concern for the welfare of minors, the Child Protection Standards have been prepared taking into account, among others:
    1. the Convention on the Rights of the Child adopted by the General Assembly of the United Nations on 20 November 1989;
    2. the Constitution of the Republic of Poland of 2 April 1997;
    3. the Act of 25 February 1964 – Family and Guardianship Code (Kodeks rodzinny i opiekuńczy);
    4. the Act of 28 July 2023 amending the Act – Family and Guardianship Code and certain other acts;
    5. the Act of 13 May 2016 on counteracting the threat of sexual crime and on the protection of minors (ustawa o przeciwdziałaniu zagrożeniom przestępczością na tle seksualnym i ochronie małoletnich).
3. In the Child Protection Standards we use the following terms:
    1. Staff/Staff Member – any person employed under a contract of employment, a civil-law contract, a volunteering agreement or an internship agreement, or otherwise cooperating with us;
    2. Responsible Person – the person indicated in Annex No. 1 as responsible for implementing the Standards, receiving reports, filing notifications, carrying out updates and performing the other duties described in the Child Protection Standards;
    3. Child – a Minor, i.e. a child who has not reached 18 years of age;
    4. Parent/Guardian of a minor (hereinafter: Parent) – a person who is entitled to represent the child, e.g. a parent or legal guardian, including a foster parent;
    5. Violence – any prohibited or punishable acts directed at a minor, including in particular those consisting in ignoring or failing to comply with the Standards by Staff Members, Guardians or other minors; such acts may take, among other forms, a psychological or physical form, or may consist in neglect.

II. Rules for safe relationships between staff and minors

1. Communication between staff and minors serves to build safe and positive relationships.
2. In relationships between staff and minors we are guided above all by attentiveness and a focus on the welfare of each child, placing the child at the centre of our activities, respecting the child’s dignity and boundaries and ensuring the child’s safety.
3. Given the professional nature of our relationships and the Child Safety Guidelines arising from the Child Protection Standards, staff may not accept or approve invitations from minors sent via social media. Nor do we permit staff to use private e-mail addresses/social media profiles to contact minors or their parents/guardians.

4. Staff are obliged to take action appropriate to the situation, bearing in mind the specific nature of working with minors. Our conduct is transparent and open, giving a sense that all children are treated equally.
5. The use of violence in any form is unacceptable, and should it occur, in particular on the part of a staff member towards a minor, we undertake to take action aimed at protecting the minor to the fullest extent.
6. Staff members are aware of their role as carers and mentors responsible for guiding children in a safe manner.
7. Cooperation with parents or guardians is key to understanding a child's needs and expectations.
8. Before starting work, each staff member familiarises themselves with the rules set out in the Standards, including those on safe relationships, which set out in detail the rules for safe relationships between staff and minors, and undertakes to comply with them.
9. Detailed rules for safe relationships between staff and minors are set out in Annex No. 2.

III. Rules for safe relationships between minors

1. Relationships between minors are just as important as relationships between minors and staff.
2. Minors have free access to the rules on safe relationships and to the short version of the Standards.
3. Children learn to respect other people's time and space, both in play and in conversation. Learning empathy and readiness to help are important elements of building healthy relationships.
4. Aggressive behaviour is unacceptable, including behaviour intended to upset or harm someone.
5. Violating the dignity of another child is unacceptable, including by humiliating, ridiculing or disrespecting their boundaries.
6. Minors know whom they can turn to if a situation arises involving other minors in which they feel uncomfortable. To an extent appropriate to their psychophysical development, they also know about the free support offered by various centres, including the numbers of free helplines for children and young people.
7. Detailed rules for safe relationships between minors are set out in Annex No. 3.

IV. Rule on the protection of image and data

1. Every minor has the right to privacy and to the protection of their personal rights (dobra osobiste), and we therefore respect these as overriding rules in this area.
2. Participants in classes or their parents/legal guardians may not record, use or disseminate the image of other minors without consent given by us, as well as

by the guardians/parents of those minors and by the minors themselves.

3. Where we decide to use a person's image, e.g. on our social media, on our website or in our portfolio, this is always done in accordance with the following rules:
    1. Care to obtain consent to the use of image – we obtain consent in advance from the minor's guardian and also, where possible, from the minor; where the minor or their guardian does not consent to the minor's image being recorded, e.g. in a photograph or video, we protect the minor so that they cannot be recognised in the audiovisual material.
    2. Not disclosing the personal data of minors or their guardians to unauthorised persons, including in particular media representatives, without the knowledge and consent of the minor's guardian.
    3. Thoughtfulness and care in selecting photographs or recordings – it is unacceptable to use for promotional purposes any content featuring minors which promotes aggressive or humiliating behaviour or which makes minors feel they are being portrayed in a negative context. Photographs/videos are not a key element of classes and we do not take them at every contact with minors (unless this follows from the specific nature of the classes and from the fact that recordings of classes form part of the offer).
4. In addition to image, we make every effort to protect minors' personal data. To this end, we act in accordance with the GDPR (in Polish: RODO) and the rules set out in the Standards.
5. Detailed rules for protecting a child's image and children's personal data are set out in Annex No. 4.

V. Rules for the safe use of the Internet and the procedure for protecting children against harmful content and threats

1. It is possible to use the Internet on our organisation's devices; where minors use our devices, a staff member is obliged to supervise this activity continuously; before first use, the minor familiarises themselves with the rules for using the Internet and must accept them before use; where devices are made available by the organisation, the devices are, among other things, reviewed to check whether they contain any content that does not meet the safety criterion for minors. If such content is found, depending on the circumstances, the content must be deleted without delay and recorded in the Incident Register (Annex No. 9) and/or it must be verified whether there is a need to contact the minor's parents/legal guardian or to involve other services/institutions.
2. It is / is not possible for minors to use the Internet (Wi-Fi) on their own devices without the supervision of our staff.
3. We promote the rules for the safe use of the Internet by making the Standards and additional educational materials available to parents/minors. The list of

materials can be found in Annex No. 10 to the Standards.

4. The most important rules for using the Internet safely are:
    1. Do not trust people you meet online unconditionally.
    2. Avoid sharing too much personal information on public profiles or when communicating with others, especially strangers.
    3. Remember the effect online content has on your wellbeing. Avoid negative situations and avoid cyberbullying.
    4. Protect your privacy.
    5. Respect others online.
    6. Use the Internet in moderation.
5. Where Staff make electronic materials available to minors, they are obliged to check in advance that those materials are safe for use by children/young people. The file in question must also be checked with antivirus software in order to eliminate the risk of installing malicious software on a device belonging to the minor or their parents/guardians.
6. Where groups/channels for internal communication intended for minors are created in the course of cooperation with us, their content is monitored by us.
7. Staff are obliged to report any worrying signs, in particular those that may indicate a danger to minors.

VI. Rules for the safe recruitment of Staff

1. Our organisation conducts the staff recruitment process using reliable assessment criteria that make it possible to assess skills, experience and competence to work with or care for minors. We care about high-quality teaching as much as about the safety of the children and young people who are in our care during classes.
2. Staff, as well as every person applying for a given position, are made familiar with the Child Protection Standards before being engaged, including the rules for safe recruitment designed to protect children from harm.
3. As part of recruitment, we also fulfil the statutory obligations laid down in the Act on counteracting the threat of sexual crime and on the protection of minors concerning the checking of staff against the Register of Sexual Offenders (Rejestr Sprawców Przestępstw na Tle Seksualnym).
4. Detailed rules for the safe recruitment of staff are set out in Annex No. 5.

VII. Intervention rules and procedures

1. We emphasise most firmly that we will take seriously every report concerning experience of violence, including in particular those made to us by minors themselves, taking into account on each occasion the individual circumstances of the situation.
2. In accordance with applicable law and good practice, we have defined four procedures relating to suspected harm to a minor, or information received about harm to a minor, by:

    1. our staff,
    2. third parties (relatives or strangers who have contact with the minor), who are not the minors' parents/legal guardians),
    3. a parent or legal guardian;
    4. other minors.
3. Detailed intervention rules and procedures are set out in Annex No. 7.

VIII. Rules for the review, updating and availability of the Standards

1. The person responsible for implementing the Standards and monitoring their application, including updates resulting from changes in the law or from proposals made by minors, their parents/guardians and staff, is the person indicated in Annex No. 1. That document also indicates, among other things, the person responsible for receiving reports of events threatening a minor and providing the minor with support, as well as for filing notifications of a possible offence and notifying the guardianship court
2. The Responsible Person is selected on the basis of education, experience of working with minors, and that person's participation in additional courses and training in teaching/working with children and in other areas supporting the work.
3. The Responsible Person is obliged to ensure that documents concerning individual minors, including records of disclosed or reported incidents or events threatening a minor's welfare, are stored with due care so that unauthorised persons have no access to them. The documents are confidential and are made available only to authorised persons.
4. In accordance with the statutory obligation, the Responsible Person is obliged to assess the Standards at least once every two years in order to ensure that they are adapted to current needs and comply with applicable law. The conclusions of the assessment will be documented in writing.
5. In order to prepare the adaptation of the Standards, the persons listed in the Training Register (Annex No. 8) take part in training, including training on implementing the Standards organised and delivered with the participation of Your Path Academy, or in other training on protecting minors from harm.
6. The Child Protection Standards are made available to parents or legal or de facto guardians and to minors via the organisation's website.
7. The Child Protection Standards are also displayed in a visible place in our premises, where minors and their parents and guardians can consult them while present at our organisation. / Owing to the specific nature of its activity and the fact that it operates exclusively online, the organisation refrains from displaying the Child Protection Standards in its premises, as those premises are not accessible to parents/guardians/minors.
8. Because our organisation places emphasis on relationships and the welfare of minors is key for us, we provide educational materials intended both for

minors and for parents/guardians. We use them during classes and take steps to familiarise parents with them. These materials include in particular information about support centres and contact numbers for services/institutions providing support and assistance, in particular where minors experience violence. The list of materials is set out in Annex No. 10.

IX. Summary

We believe that, through our shared commitment, we will meet requirements which constitute the fulfilment of a statutory obligation but which, above all, are intended to serve a fundamental purpose: ensuring the protection of minors. We therefore thank you in advance for your trust and for choosing our organisation, which will contribute to your child's development in a safe, lawful and effective way.

We also thank our staff, who together with us create a space that enables the development of our students, whom we watch with pride every day.

X. Annexes

Annex No. 1 – Responsible persons Annex No. 2 – Rules for safe relationships between staff and minors Annex No. 3 – Rules for safe relationships between minors Annex No. 4 – Rules for protecting a minor's image and personal data Annex No. 5 – Rules for safe recruitment and cooperation with staff Annex No. 6 – Statements for Staff Annex No. 7 – Procedures for intervening where harm to a minor is suspected or information about harm to a minor has been received Annex No. 8 – Training Register Annex No. 9 – Incident Register Annex No. 10 – List of additional materials and important sources of support

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ANNEX No. 1 – Responsible persons

The Responsible Person referred to in the Standards is:

Mikołaj Talaga tel.: +48 666 605 680 e-mail: mikolaj.talaga@ypa.pl

Scope of duties: − implementing the Standards and monitoring their application, including updates resulting from changes in the law or from proposals made by minors, their parents/guardians and staff − receiving reports of events threatening a minor and providing the minor with support − filing notifications of a possible offence, notifying the guardianship court and, in the case of institutions that have such powers, the persons responsible for initiating the 'Blue Card' procedure (procedura 'Niebieskie Karty', the Polish domestic violence intervention procedure)

ANNEX No. 2 – Rules for safe relationships between staff and minors

The rules for safe relationships between staff and minors are intended to protect children against all forms of abuse and prohibited behaviour.

Every staff member is obliged to maintain professional relationships with minors, taking their needs into account, including the needs of children with disabilities or children with special educational needs, to the extent that such services are provided by our organisation.

As a rule, contact between staff and minors should take place only during classes or immediately before/after them and should relate solely to the performance of professional duties.

The most important rules for relationships between staff and minors are set out below:

ATTENTIVENESS AND FOCUS ON THE CHILD'S WELFARE

Communication between staff and minors serves to build safe and positive relationships.

1. Every staff member is obliged to listen attentively to children and to answer them and pass on knowledge in a way adapted to their age and their ability to understand the situation.
2. Staff engage in dialogue with children without imposing their own views, beliefs or patterns of behaviour.
3. Staff do not belittle or ignore the significance of children's problems and difficulties, applying the principles of empathetic communication.
4. Using various forms of verbal and non-verbal communication, staff encourage minors to take part in various activities during classes; however, where a minor is unwilling to participate, the minor is not forced or disregarded.
5. Staff inform minors that if particular situations, behaviour, words or gestures make them feel uncomfortable, they can talk to the staff member conducting the class or pass this on to another person designated as a contact in such situations.
6. Where a staff member is a person close to the minor/the minor's parents, the staff member is obliged to keep confidential all information concerning other minors, as well as their guardians or other people around those minors.

NON-DISCRIMINATION AND RESPECT FOR BOUNDARIES

1. Any discriminatory action, or action that could be regarded as violence, is unacceptable. All forms of physical, emotional or sexual violence against minors are absolutely unacceptable, and should such violence occur, in particular on the part of a staff member towards a minor, we undertake to take action aimed at protecting the minor to the fullest extent.
2. Violating a child's dignity is unacceptable, including by humiliating, ridiculing or disrespecting students' boundaries.

3. Staff do not give orders to children or shout at them, unless this follows from the situation in which the minor finds themselves and is justified by the minor's safety and the need to react immediately.
4. Games or other activities that contain elements of brutality, aggression or any other form of violence, or that encourage such conduct or may indirectly provoke it, are prohibited. Behaviour in the nature of sanctions, punishments or reprimands is also prohibited.
5. Where children need help with care, hygiene or other situations appropriate, among other things, to the child's age, physical contact with the minor should be kept to a minimum.
6. Staff should respect minors' privacy and avoid any actions that violate their personal boundaries. This also includes respecting privacy when changing clothes or using the toilet.
7. Physical contact with minors should be limited to situations that are necessary for the care of the child. Staff should avoid excessive or unjustified touching, holding or hugging. However, specific circumstances may arise in which physical contact is appropriate and adapted to the circumstances, including the child's needs. A staff member does not initiate such contact and asks in advance for consent to touch (e.g. a hug). If the minor does not consent, the staff member respects the physical and psychological boundaries set by the minor. Violating such boundaries where this is not justified by the circumstances is strictly prohibited.
8. Accepting money or other gifts of significant value from parents or from minors themselves is unacceptable, in particular for the purpose of favouritism or obtaining additional privileges.
9. Where a staff member learns that a particular minor has experienced violence (including in particular rape, molestation, etc.), the staff member is obliged to exercise particular attentiveness and sensitivity in all actions they take, including during classes, taking into account the child's increased need for safety.

UNDERSTANDING THE ADULT'S ROLE AS CARER AND MENTOR

1. Staff members are aware of their role as carers and mentors responsible for guiding children in a safe manner. It is unacceptable to bring about situations that could lead to abuse or misuse of this role.
2. Given the professional nature of our relationships and the Child Safety Guidelines arising from the Child Protection Standards, staff may not accept or approve invitations from minors sent via social media. Nor do we permit staff to use private e-mail addresses/social media profiles to contact minors or their parents/guardians.
3. Staff may not communicate with minors/minors' parents through private communication channels (private telephone, e-mail, messaging apps, closed private groups, social media profiles). Where this is justified, e.g. by the nature of the classes, in every case at least one other person who is a staff

member or the owner of the company should have access to the channel in question.

4. It is unacceptable to initiate or extend invitations to children/young people to one's place of residence, or to meet minors in other places outside working hours for purposes other than those within the scope of the person's duties.
5. If there is a need to meet minors or their parents outside working hours, the staff member informs the organisation in advance and, where the meeting is solely between the minor and the staff member, the minor and the minor's guardians must consent to such contact.
6. Staff avoid being alone with a minor without other staff or other minors present (unless justified by the specific nature of the work). Where such a situation occurs, its duration should be kept to an absolute minimum. Where the circumstances indicate that the minor is initiating such contact, in particular in cases of e.g. infatuation, staff are obliged to report the situation to the owner of the organisation. The minor's guardian is then also informed.
7. It is unacceptable for staff to enter into relationships of a romantic or sexual nature with minors in any form, including by sharing or sending content of an erotic or pornographic nature.
8. Staff should avoid using inappropriate content in communication with minors, both spoken and written (including avoiding jokes or comments with sexual undertones).
9. In the case of trips, excursions or workshops lasting more than one day, sharing a bed or a room with minors is prohibited.
10. Recording a child's image is unacceptable, except for professional purposes, e.g. the company's training or promotional purposes, provided that the parent and the minor consent to it.

COMMUNICATION WITH THE CHILD'S GUARDIANS

1. Cooperation with parents or guardians is key to understanding a child's needs and expectations. Staff should maintain open and transparent communication with the family, informing them of progress, events and all important matters concerning the child.
2. In emergencies (e.g. the minor's absence even though no absence has been reported), the staff member should first contact the minor's guardian and, if this is not possible, the minor. Contact should take place through official channels (e-mail, telephone, other messaging app), where possible.

STAFF COMMUNICATION WITHIN THE COMPANY

1. Staff also observe the rules set out in the Standards in their relationships with one another. Where justified and necessary to ensure a child's safety, they exchange information about individual minors, but do not disclose their sensitive information or information enabling them to be identified (unless necessary), in particular to persons who are not directly connected with their workplace.

2. In case of doubt concerning a child’s behaviour, a Staff Member is obliged to inform the person in the company responsible for the Child Protection Standards (hereinafter: the Responsible Person).
3. Where a Staff Member notices that relationships between minors involve conduct contrary, in particular, to the rules adopted in the Standards, the Staff Member is obliged to take action and measures aimed at protecting against harm, including informing the Responsible Person of the situation in order to analyse its causes and find a solution, where possible with the involvement of the minors who are, for example, parties to the conflict.
4. All situations that are contrary to the law or to the rules adopted in these Standards are referred to the person in the company responsible for the Child Protection Standards.

ANNEX No. 3 – Rules for safe relationships between minors

Rules for safe relationships between minors are important for building positive interactions and creating a safe environment.

These are the most important rules that guide us in our Company:

TRANSPARENCY

Minors have free access to, and knowledge of, the short version of the Standards. Where possible, Minors take part in formulating the rules connected with the Standards, in a way adapted to their age, skills and ability to understand these issues.

Where possible, e.g. depending on the age of the children/young people, educational activities are planned during work with children to raise minors’ awareness of how to build and maintain positive relationships with other minors and of what behaviour should not be tolerated. Where the nature of the classes makes this impossible, children/young people have access to educational materials, including the short version of the Standards.

GOOD RELATIONSHIPS

1. Children learn to communicate through playing and working together. Group activities make it possible to develop communication and cooperation skills and an understanding of other people’s perspectives.
2. Children learn to respect other people’s time and space, both in play and in conversation. This helps them develop the ability to wait their turn and to understand the needs of others.
3. Children are encouraged to use language free from aggression, verbal abuse or other harmful forms of communication.

4. Learning empathy and readiness to help are important elements of building healthy relationships.
5. Children are encouraged to support their peers, especially in difficult situations.

RESPECT AND NON-DISCRIMINATION

1. Every child deserves equality and fair treatment.
2. Discrimination or social exclusion is unacceptable.
3. Violating the dignity of another child is unacceptable, including by humiliating, ridiculing or disrespecting their boundaries.

SUPPORT

1. Children have the right to report to Staff any situations they do not like, or matters that are dangerous or inappropriate. Staff accept such reports on every occasion. The assessment of whether a report is well founded and the scope of action to be taken in connection with it should be decided after analysing the circumstances.
2. Minors know whom they can turn to if a situation arises involving other minors in which they feel uncomfortable. To an extent appropriate to their psychophysical development, they also know about the free support offered by various centres, including the numbers of free helplines for children and young people.
3. Drawing on their experience and skills, staff organise supportive and integrating activities that enable minors to form friendly relationships.
4. Where a staff member observes conflict situations between minors, the staff member is obliged to respond in a way appropriate to the situation and to show a supportive approach, without judging or favouring either side. Staff should educate and observe carefully and, where such situations are observed, take action aimed at eliminating this negative phenomenon.
5. Staff who observe discriminatory behaviour among minors, in particular humiliating or mocking behaviour, especially if repeated, inform the Responsible Person and follow the procedures set out in the Standards.
6. Aggressive behaviour intended to upset or harm someone is unacceptable. Minors should be aware of behaviour that constitutes verbal and non-verbal violence, including in electronic form. Staff should educate and observe carefully and, where such situations are observed, take action aimed at eliminating this negative phenomenon.
7. Staff who observe discriminatory behaviour among minors, in particular humiliating or mocking behaviour, especially if repeated, inform the person responsible for the Child Protection Standards and follow the procedures set out in the Standards.
8. Where possible, e.g. depending on the age of the children/young people, educational activities are organised to raise minors’ awareness of how to build

and maintain positive relationships with other minors and of what behaviour should not be tolerated.
9. Minors know whom they can turn to if a situation arises involving other minors in which they feel uncomfortable. To an extent appropriate to their psychophysical development, they also know about the free support offered by various centres, including the numbers of free helplines for children and young people.
10. Cases in which safety has been breached in relationships between minors are documented in writing.

ANNEX No. 4 – Rules for protecting a minor’s image and personal data

Our organisation takes measures to protect both the image and the data of minors.

We aim to ensure that photographs, films and other promotional materials, in particular those placed on the website and on social media, present participants in classes as a group, unless the specific nature of the event or activity relates to one minor only.

We make sure that the rules covering minors’ image and personal data are transparent. Therefore, before such materials are published, in addition to obtaining the written consent of the parent/legal guardian, we also ask for the consent of the minors, whom we treat as individuals with their own agency and whose rights we respect, including the right to refuse such consent or to refuse to take part in the material in question. We emphasise that every choice a minor makes is fully respected by us and in no way leads to exclusion from the group. Nor do we impose any penalties or take any other action that could make a child feel guilty about refusing.

The key rules in this area are: 1) Obtaining the consent of the parent/legal guardian and asking whether the minor would like to take part in the photograph/recording; 2) Explaining the purpose of recording and publishing the image, in a way appropriate to the minors’ age and ability to understand. 3) When recording various materials, we do not use the child’s full personal data, limiting ourselves to first names only, where necessary. 4) We do not publish any sensitive data about minors, in particular data passed to us by their guardians (e.g. about their health or various kinds of special educational needs). 5) We respond to all situations reported by the organisation’s staff, by minors’ guardians or by minors themselves that concern even a potential breach of the security of their data, including their image. Such situations are recorded in the breach register.

When cooperating with an external company that will provide photography or filming services, we are obliged to pass on to it the rules contained in these Standards. At the same time, during the event, the persons representing the

external company referred to above are obliged to wear an identification badge or otherwise be clearly identifiable (e.g. by wearing a T-shirt bearing the company's name). It is unacceptable for such persons to be with minors without the supervision of our organisation's staff.

Participants in classes or their parents/legal guardians may not record, use or disseminate the image of other minors without the consent of those minors' guardians/parents and of the minors themselves.

If media representatives or other entities wish to record our classes or an event organised by us, such a request must be submitted in advance and the consent of the owner of the organisation obtained. The request must state the first name, surname and contact details of the entity making the request, as well as the purpose and scope of the recording. We are obliged to verify such entities.

Staff take all measures aimed at preventing the recording of a minor's image or any processing of personal data by media representatives or other unauthorised persons where the minor's parents/legal guardians and the minors themselves have not given consent. In particularly justified cases, e.g. at the request of the parents/legal guardians, staff may provide media representatives or other entities with basic information, but they must first contact the Responsible Person in order to agree the procedure in writing, including in particular the scope of the information that may be disclosed.

RULES FOR STORING PHOTOGRAPHS AND RECORDINGS

Photographs and recordings are stored in compliance with security rules so as to prevent access to them by unauthorised persons. To this end, we take the following measures: 1) As a rule, we use company telephones/computers to store photographs and recordings. Where a staff member records material on their own telephone or other device, they are obliged to transfer the material to the organisation's device and then delete it from their private devices. Staff should not make copies of such content. 2) The equipment and data carriers used by the organisation are secured to protect the image and data of individuals, including in particular minors, their parents/legal guardians and our staff. To this end, we use, among other things, passwords and certified software that meets security requirements.

MODEL CONSENT TO THE USE OF IMAGE

CONSENT TO THE USE OF A MINOR'S IMAGE

Concerning the child: _____ (child's first name and surname)

I consent to the recording, use and dissemination of my child's image for the Organiser's documentation, educational, marketing and promotional purposes. The

image may be subjected to various forms of electronic processing, cropping and composition, and may be combined with the images of other persons taking part in, among other things, classes and events, while a recording featuring the child may be cut, edited, modified and added to other materials created in the course of the activities of Your Path Academy.

The consent covers all forms of publication, including on the website and on the social media of Your Path Academy, such as: - _____, - _____, - _____.

If the image consent referred to above is withdrawn, during or after the end of the Contract, the guardian is obliged to indicate the specific publications that should be removed.

I declare that I have read the GDPR (RODO) information clause.

..... (place, date, signature of the legal guardian)

ANNEX No. 5 – Rules for safe recruitment and cooperation with staff

When recruiting staff for our organisation, and during subsequent cooperation, we comply with generally applicable law and with the rules set out in the Standards.

Our key activities focus on: 1) thorough recruitment, which includes verifying the information provided about the person applying for the position; at the same time, we also check whether the candidate applying for the position shares professional values similar to ours, i.e. whether they have the skills to teach children and young people, how they conduct classes, and whether they are prepared to work with minors; 2) defining safe relationships between minors and staff, including identifying prohibited behaviour as set out in the adopted Standards; 3) familiarising staff with the rules set out in the Standards; 4) continuously developing competence, which we achieve, among other things, through comprehensive training, including in teaching methodology, communication with students and other subjects useful for the effective performance of professional duties; 5) implementing contracts and class regulations designed to ensure transparent rules of cooperation; 6) educating staff on subjects including: a) identifying risk factors and recognising the symptoms of harm to minors, b) intervention procedures where harm to minors is suspected, including experience of domestic violence, c) staff responsibility, in particular as regards passing on information about minors who may be experiencing violence; 2) monitoring the wellbeing of minors and ensuring the availability of support in line with the nature and type of the organisation’s activity; 3) developing educational materials and organising classes with elements that raise children’s awareness of the possibilities

of obtaining support, as well as of threats relating, among other things, to cybersecurity; 4) taking into account the situation of minors with disabilities and minors with special needs in a manner adapted to the nature and type of the establishment or activity; 5) continuous supervision of the implementation of the Standards and their modification and updating in line with the needs of minors; 6) carrying out activities in accordance with the procedures set out below and included in the Standards;

The recruitment of a prospective staff member is a process that enables a reliable assessment of their qualifications, skills and aptitude for working with children and young people, including in particular ensuring their safety.

To ensure that this process runs properly, the organisation obtains information about the prospective candidate, including their education, professional experience/qualifications and employment history.

It is recommended that the references from previous workplaces provided by the candidate be verified. 1) With the candidate's consent, the organisation may contact previous employers. The candidate must give prior consent to such contact. 2) In addition, in accordance with Article 21 of the Act of 13 May 2016 on counteracting the threat of sexual crime, the organisation: − itself checks every candidate before engagement in the Register of Sexual Offenders – the restricted-access register – and in the Register of persons in respect of whom the State Commission for Counteracting the Sexual Abuse of Minors under the Age of 15 (Państwowa Komisja do spraw przeciwdziałania wykorzystaniu seksualnemu małoletnich poniżej lat 15) has issued a decision on entry in the Register. A printout from the Register is placed in the employee's personnel file (in the case of a contract of employment) or in other documentation relating to the person engaged/contractor (in the case of other contracts) a) obtains from each candidate: o information from the National Criminal Register (Krajowy Rejestr Karny, KRK) confirming the absence of a criminal record with respect to the offences specified in Chapters XIX and XXV of the Polish Criminal Code (Kodeks karny), in Article 189a and Article 207 of the Criminal Code and in the Act of 29 July 2005 on Counteracting Drug Addiction (Journal of Laws of 2023, item 172, and of 2022, item 2600), or for prohibited acts corresponding to those offences specified in foreign law. o a statement, made under penalty of criminal liability, of the country or countries other than the Republic of Poland and the country of citizenship in which the person has lived during the last 20 years (a model of such a statement is provided below), and the candidate also submits information from the criminal records of those countries obtained for the purposes of professional or volunteer activity involving contact with children; if the law of the country does not provide for the issue of information for the purposes of professional or volunteer activity involving contact with children, information from the criminal record of that country is submitted; b) additionally obtains from a candidate who holds citizenship other than Polish information from the criminal record of the country of citizenship

obtained for the purposes of professional or volunteer activity involving contact with minors, or information from the criminal record if the law of that country does not provide for the issue of information for the purposes indicated above. c) If the law of the country from which the criminal record information referred to in letters b and c is to be submitted does not provide for the issue of such information, or that country does not keep a criminal record, the candidate makes, under penalty of criminal liability, a statement to that effect together with a statement that they have not been finally convicted in that country of prohibited acts corresponding to the offences specified in Chapters XIX and XXV of the Criminal Code, in Article 189a and Article 207 of the Criminal Code and in the Act of 29 July 2005 on Counteracting Drug Addiction, that no other ruling has been issued against them finding that they committed such prohibited acts, and that they are not subject to an obligation, arising from a ruling of a court or other competent authority or from statute, to comply with a ban on holding any or specified positions, practising any or specified professions or pursuing activities related to the upbringing, education, recreation, medical treatment, provision of psychological counselling, spiritual development, sport or pursuit of other interests of minors, or to caring for them. A model of such a statement is provided in Annex No. 6. 3) At the end of statements made under penalty of criminal liability, the candidate adds a statement worded as follows: I am aware of the criminal liability for making a false statement. This statement replaces the authority’s caution about criminal liability for making a false statement.

ANNEX No. 6 – Statements for Staff – internal document

STATEMENT BY AN EMPLOYEE / CONTRACTOR CONFIRMING FAMILIARITY WITH THE STANDARDS

Place / date: ……,

STATEMENT

I declare that I have read the Child Protection Standards in force and I undertake to comply with the rules set out in them.

…… (place, date and signature)

STATEMENT OF NO CRIMINAL RECORD

I, the undersigned ……, declare that in the country …… no criminal record is kept / no information from the criminal record is issued.

I declare that I have not been finally convicted in that country of prohibited acts corresponding to the offences specified in Chapters XIX and XXV of the Criminal Code, in Article 189a and Article 207 of the Criminal Code and in the Act of 29 July 2005 on Counteracting Drug Addiction, that no other ruling has been issued

against me finding that I committed such prohibited acts, and that no obligation has been imposed on me, arising from a ruling of a court or other competent authority or from statute, to comply with a ban on holding any or specified positions, practising any or specified professions or pursuing activities related to the upbringing, education, recreation, medical treatment, provision of psychological counselling, spiritual development, sport or pursuit of other interests of minors, or to caring for them.

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

…… (place, date and signature)

STATEMENT OF COUNTRIES OF RESIDENCE

I declare that:

− during the last 20 years I have not lived in any countries other than the Republic of Poland and the country of my citizenship;

− I have lived in the following countries other than the Republic of Poland and the country of my citizenship: _____ *

* complete if applicable

If I have lived in countries other than the Republic of Poland and the country of my citizenship, I submit information from the criminal records of those countries obtained for the purposes of professional or volunteer activity involving contact with minors / information from the criminal records.

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

…… (place, date and signature)

ANNEX No. 7 – Procedures for intervening where harm to a minor is suspected or information about harm to a minor has been received

GENERAL RULES

1. In our Standards, we regard the following as a threat to the safety of minors:
    a. the commission of an offence to the detriment of a child, including in particular physical violence, rape and sexual abuse;
    b. any other form of harm, including in particular shouting, humiliation, intimidation, or economic or psychological violence;
    c. neglect of the child’s basic needs, including in particular those relating to nutrition, hygiene and health.

2. The Responsible Person indicated in Annex No. 1 is responsible for receiving reports of events threatening a minor and providing the minor with support [the Polish sentence ends with a stray word ‘jest’ (‘is’)]
3. Where our staff come to suspect, or receive information, that a minor is being harmed, staff are obliged to pass on the relevant information without delay.
4. If it is suspected that a minor’s life is in danger or that the minor is at risk of serious harm to health, the appropriate services (Police, ambulance service) must first be informed without delay by calling 112 or 998 (ambulance), and we must then be informed. The staff member who first obtained information about such a threat is responsible for informing the appropriate services.
5. Where our staff receive a report/information that minors are being harmed by our organisation’s management, the person who noticed the harm or to whom the suspected harm was reported is responsible for taking the actions set out in these procedures.
6. The information referred to above should be recorded by staff in writing or by e-mail.
7. Staff who have information about harm, or information relating to the circumstances of a case involving harm, are obliged to keep that information confidential, except for information passed to authorised institutions as part of their intervention activities.
8. Where a suspected threat to a minor’s safety is reported by the minor’s parents/legal guardians and, after verification, the suspicion is not confirmed, we inform the minor’s parents/legal guardians of this in writing.

HARM BY THIRD PARTIES

1. Under applicable law, we are obliged to set out procedures in case a suspicion arises, or we obtain information, that a minor is being harmed by third parties.
2. Where the situation referred to in the point above arises, the Responsible Person indicated in Annex No. 1 takes steps to talk to the minor and to other persons who have or may have knowledge of the event itself and of the minor’s personal situation, in particular the minor’s parents/legal guardians. That person seeks to establish the course of the event and other circumstances affecting the child’s mental and physical health, including indicating the possibility of, or need for, specialist support provided by other organisations (e.g. foundations) or services.
3. Where an offence has been committed against the minor, the Responsible Person prepares a notification of a possible offence and submits it to the police or public prosecutor’s office having local jurisdiction. A model notification is provided below.
4. If the conversation held with the minor’s parents/guardians and/or the circumstances of the case show that they are ignoring the event, downplaying it and are not interested in providing support to the minor who has experienced harm, the Responsible Person prepares an application for the

court to examine the family's situation (wniosek o wgląd w sytuację rodziny), which is submitted to the competent family court. A model of such an application is provided below.
5. Further proceedings are conducted by the appropriate institutions/services, but we undertake to cooperate closely with them.

HARM BY A PARENT/GUARDIAN

1. Under applicable law, we are obliged to set out procedures in case a suspicion arises, or we obtain information, that a minor is being harmed by the guardian.
2. Where harm that has been or is being committed by a parent/guardian of the minor is reported, the Responsible Person indicated in Annex No. 1 talks to persons who have or may have knowledge of the event itself and of the minor's personal situation. That person seeks to establish the course of the event and other circumstances affecting the child's mental and physical health.
3. Where an offence has been committed against the minor, the Responsible Person indicated in Annex No. 1 prepares a notification of a possible offence and submits it to the police or public prosecutor's office having local jurisdiction. A model notification is provided below.
4. If the actions taken and findings made indicate that the minor's parent/guardian is neglecting the minor's psychophysical needs, or that the family is failing in its parenting role, or that the family uses violence against the minor (in particular by hitting or other corporal punishment), the Responsible Person informs the competent social welfare centre, the school or other educational institutions of the need to help the family, where the failure to meet needs results from poverty, or – in the case of violence and neglect – of the need to initiate the 'Blue Card' procedure.
5. Further proceedings are conducted by the appropriate institutions/services, but we undertake to cooperate closely with them.

HARM TO A MINOR BY A PEER

1. Under applicable law, we are obliged to set out procedures in case a suspicion arises, or we obtain information, that a minor is being harmed by other minors.
2. Where it is suspected that a minor is being harmed by another minor attending classes, the Responsible Person indicated in Annex No. 1 undertakes to notify that minor's parents/guardians. In addition, the Responsible Person talks to the minors and to other persons with knowledge of the matter. During these conversations, attention must be paid to ascertaining whether the minor suspected of harming another minor is not themselves being harmed by parents/guardians, other adults or other minors. If the above circumstances are verified and confirmed, [upon] confirmation of

such circumstances the procedure HARM BY OTHER THIRD PARTIES or HARM BY A PARENT/GUARDIAN/STAFF must be followed.

3. Where the minor causing the harm does not take part in classes organised by our organisation, the Responsible Person talks to the minor who is being harmed, to other persons with knowledge of the event (where possible/advisable), and to the parents/guardians of the child being harmed, in order to establish the course of the event and its impact on the minor's mental and physical health, and indicates the possibility of, or need for, specialist support provided by other organisations (e.g. foundations) or services.
4. If the person suspected of causing harm is a minor aged 13 to 17 and their behaviour constitutes a punishable act, the family court or the police having local jurisdiction must also be informed by written notification.
5. If the person suspected of causing harm is a minor over 17 years of age and their behaviour constitutes an offence, the police unit or public prosecutor's office having local jurisdiction must be informed by written notification.

HARM TO A MINOR BY A STAFF MEMBER

1. Under applicable law, we are obliged to set out procedures in case a suspicion arises, or we have obtained information, that a minor is being harmed by a staff member of our organisation.
2. Where such a report is made, that person is immediately removed from performing all activities involving contact with minors until the matter has been clarified.
3. The Responsible Person indicated in Annex No. 1 talks to the minor and to other persons who have or may have knowledge of the event and of the minor's personal situation (in particular the family situation), including the minor's parents/guardians. That person seeks to establish the course of the event and other circumstances affecting the child's mental and physical health, and also indicates the possibility of, or need for, specialist support provided by other organisations (e.g. foundations) or services.
4. Where an offence has been committed against the minor, the Responsible Person prepares a notification of a possible offence and submits it to the police or public prosecutor's office having local jurisdiction. A model notification is provided below.
5. Where a staff member has subjected the minor to a form of harm other than an offence committed to the minor's detriment, the Responsible Person investigates the circumstances of the case, including seeking to hear all parties, i.e. the minor, the staff member suspected of causing harm and other persons who have or may have information about the event.
6. Irrespective of the scope of the report, we undertake to take appropriate action, including in particular considering ending cooperation with that person, if justified by the circumstances of the case.

Notification of a suspected offence (model)

Place, date .....

Notifying party: ....

I hereby give notice of a suspected offence of ..... (description of the offence) to the detriment of the minor ..... (first name and surname of the minor, date of birth or other identifying details of the minor held by the notifying party) committed by ..... (first name and surname of the alleged perpetrator) and request that preparatory proceedings be instituted in this matter.

Statement of reasons

During the performance of official duties by ..... (first name and surname of the staff member), consisting of ....., the minor reported that ..... (stating e.g. the first name and surname of the person concerned or, if not known, their relationship to the minor, e.g. a friend) .....
.....
.....

The person who can provide more detailed information on this matter is ..... (first name, surname, telephone number and correspondence address of the person making the notification).

..... signature of the person making the notification

Application for examination of the family situation

Place, date .....

....

District Court (Sąd Rejonowy) in ..... Family and Juvenile Division (Wydział Rodzinny i Nieletnich)

Participants in the proceedings:

..... (first names and surnames of the minor’s parents, address of residence)

..... (first name and surname of the minor, date of birth/other identifying details).

I request an examination of the family situation of the minor ..... (first name and surname of the minor), residing at ..... (address of the minor).

I have obtained information indicating that .....
.....
.....

..... (signature of the applicant)

ANNEX No. 8 – Training Register – internal document

	Participant's first name and surname	Name of training	Date of training
1.			
2.			
3.			
4.			
5.			

ANNEX No. 9 – Incident Register – internal document

	Date of incident	Type of incident (whom it concerns)	Circumstances of the breach and other additional information	Remedial action taken
1.				
2.				
3.				

ANNEX No. 10 – Sources of support

IMPORTANT CONTACT NUMBERS: ● 112 – emergency number ● 116 111 – Helpline for Children and Young People (Telefon Zaufania dla Dzieci i Młodzieży) ● 800 120 002 – Nationwide Helpline for Victims of Domestic Violence 'Niebieska Linia' ('Blue Line') ● 800 100 100 – Helpline for Parents and Teachers on Child Safety ● 800 12 12 12 – Children's Helpline of the Ombudsman for Children (Rzecznik Praw Dziecka)

OMBUDSMAN FOR CHILDREN CHAT A free, 24-hour chat service run by the Ombudsman for Children, intended for minors: https://czat.brpd.gov.pl

SUPPORT CENTRES Depending on the situation you are dealing with, you can look for support and help from organisations operating in your region, such as: ●

social welfare centres, ● foundations and associations working for minors, ● children’s rights protection committees, ● psychological and educational counselling centres (poradnie psychologiczno-pedagogiczne), ● mental health clinics for children and young people, ● the contact point for reporting illegal content on the Internet: https://dyzurnet.pl/