CHILDREN PROTECTION POLICY

FRAME – Foundation for the Development of International and Educational Activity Address: ul. Bajeczna 1, 91-456 Łódź, Poland | E-mail: info@euframe.eu | www.euframe.eu

Preamble

Guided by the best interests and well-being of children and adolescents, the FRAME Foundation establishes these Children Protection Policy. All Foundation activities – including consultations, classes, support groups and workshops – are conducted in a safe, accepting and respectful environment. Our paramount principle is to act for the child's benefit and in their best interests. Every team member treats children with respect and takes their needs into account. The Foundation does not tolerate any form of violence against children. Personnel act within the law, the Foundation's internal regulations and within their professional competence.

General Provisions

1. The FRAME Children Protection Policy is introduced to ensure the safety of children and young people during all Foundation activities.
2. The Standards apply to all employees, associates, volunteers, interns/trainees and any person conducting activities on behalf of the Foundation.
3. The legal basis includes the Act of 13 May 2016 on counteracting threats of sexual offences and on the protection of minors (consolidated text: Journal of Laws 2024, item 560, 1228) and other applicable regulations.

Chapter I. Glossary of Terms

Member of staff / Personnel – a person employed under an employment or civil law contract, a member of the organisation, a volunteer or an intern/trainee.

Foundation Board – the governing body authorised to decide on the Foundation's actions in accordance with law and internal documents.

Child – any person under 18 years of age.

Child's guardian – a person authorised to represent the child, in particular a parent, legal guardian or foster parent.

Parental consent – consent of at least one parent; in case of disagreement the matter must be decided by the family court.

Child abuse – a criminal act against a child or any situation that threatens the child's welfare (including neglect).

Internet safety officer – a staff member appointed by the Board to supervise children's internet use and online safety.

Child safeguarding officer – a staff member appointed by the Board to supervise implementation and compliance with the Standards.

Child's personal data – any information enabling identification of a child.

Foundation – FRAME – Foundation for the Development of International and Educational Activity.

Legal guardian – a person who, under the law, exercises full or partial custody over a child.

Candidate – a person applying to cooperate with the Foundation or taking part in a recruitment process.

Chapter II. Recognising and Responding to Risk Factors

1. Staff members are trained and remain vigilant to risk factors and indicators of child abuse.
2. Where risk factors are identified, the staff member speaks with the child's guardian, informs them about available support offered by the Foundation and encourages them to seek help.
3. Staff monitor the child's situation and well-being during consultations, support groups and workshops.
4. Staff know and apply the rules for safe staff–child and child–child relationships (Annexes 2 and 3).
5. Recruitment of staff follows the Foundation's safe recruitment rules (Annex 1).

Chapter III. Intervention Procedures in Suspected Child Abuse

1 Types of risks: criminal offences against a child (e.g., sexual exploitation, abuse), other forms of harm (e.g., shouting, humiliation), neglect of basic needs (nutrition, hygiene, health).

2 Staff duties:

a. Each staff member must immediately report any suspicion of child abuse to the designated person receiving such reports preparing a written note (paper or e-mail) and forwarding it to the Board.

b. The intervention is conducted by the Board or a designated person; if the suspicion concerns the designated person, the Board takes over.

c. Specialists (psychologist, pedagogue) may be involved. All actions are documented using the

Intervention Record (Annex 4).

3 In addition to the immediate emergency line (112), external reports and referrals in Poland shall be directed to competent authorities, including:

- National Police (Policja): 997 or local station in Łódź.
- Ombudsman for Children (Rzecznik Praw Dziecka): Helpline: 800 12 12 12.
- Helpline for Children and Youth (Telefon Zaufania dla Dzieci i Młodzieży): 116 111.
- Competent Family and Guardianship Court (Sąd Rodzinny i Opiekuńczy) with jurisdiction over the child's place of residence or activity location.

4 Abuse by an adult: fact-finding conversations, support to guardians, notifying law enforcement/family court if necessary; the staff member concerned is removed from contact with children pending clarification; confidentiality is maintained.

5 Peer-on-peer abuse: separate conversations with the parties involved, a corrective plan for the child who caused harm, a safety plan for the harmed child, and – depending on age and legal qualification – notifications to the police/family court as required.

Chapter IV. Protection of Children's Personal Data and Image

1. Children's personal data are processed in compliance with GDPR. The scope may include: name and surname, date of birth, address, guardians' contact details, relevant health information (if necessary for safety), records of participation (including photos/videos with consent).
2. Safeguards: limited access (authorisations), technical and organisational security measures, secure storage/archiving, no publication of personal data without consent.
3. Access is limited to authorised persons or processors under data processing agreements. Data are shared only on a legal basis or with the guardian's consent.
4. Retention: for as long as necessary to fulfil the purpose; afterwards data are deleted or anonymised, in line with the internal retention procedure.
5. Image protection: recording a child's image requires written guardian consent and must serve legitimate Foundation purposes; publication requires separate written consent specifying purpose and placement; no recording by third parties without consent; no recording in situations violating dignity/privacy; any CCTV (if used) complies with the law.
6. Media relations: media must not record a child's image nor receive guardian contact details without the guardian's prior written consent.

Chapter V. Safe Use of the Internet and Electronic Media

1. The Foundation ensures safe internet access: up-to-date filtering software, staff supervision, education on online safety, and visible information materials near workstations.
2. Network & device security: a designated IT coordinator installs/updates security tools, monitors access on publicly available computers and reports irregularities.
3. If harmful content is found: identify the user, inform the Board and the child's guardians, implement corrective and/or educational measures.

Chapter VI. Monitoring and Updating the Standards

1. The Board appoints persons responsible for child safeguarding within the organization: Izabela Warwas, Vice-President of the board, e-mail: warwas.izabela@gmail.com, tel. 519 081 919
2. These persons monitor implementation, respond to breaches and propose amendments.
3. Any changes to the Standards are communicated to all personnel.
4. This Policy and its annexes shall be formally reviewed and updated at least once every two years (or sooner in the event of legislative amendments, organizational changes, or lessons learned following a safeguarding incident). Any revisions must be formally approved by the Foundation Board and communicated to all personnel and partners.

Chapter VII. Final Provisions

1. These Standards enter into force on the date of publication: 01.09.2025
2. The Standards are made publicly available at the Foundation's premises and published online on the official Website: https://euframe.eu/wp-content/uploads/2026/10/Child-Protection-Policy_FRAME_EN.pdf. A child-friendly short version is also provided (Annex 5). Questions and notifications regarding the Standards should be addressed to the responsible persons: info@euframe.eu
3. Any individual (including children, parents, participants, external stakeholders, or staff members) may submit questions, concerns, or formal complaints regarding the implementation of these Standards or suspected misconduct. Complaints can be lodged directly to the Child Safeguarding Officer (Izabela Warwas, warwas.izabela@gmail.com) or via the general address (info@euframe.eu). FRAME guarantees strict confidentiality and strictly prohibits any retaliation, disadvantage, or discrimination against any person reporting a concern or cooperating with an investigation in good faith.

Chapter VIII. Annexes

Annex 1: Safe Recruitment Rules for Staff

Annex 2: Declaration of Clean Criminal Record and Commitment to Safeguarding Principles Annex 3: Staff/Associate Acknowledgement of Familiarity with the Standards

Annex 4: Intervention Record

Annex 5: Child-friendly Short Version of the Standards

Annex 1. Safe Recruitment Rules

1. Getting to know the candidate: education, qualifications, employment history; assessment of attitude towards children's rights and safeguarding.
2. Identification data required by law: first name(s), surname, date of birth, PESEL (where applicable), contact details.
3. References – requested with the candidate's consent; lack of consent shall not be the sole basis for refusal.
4. Legally required checks: Sexual Offenders Register (RSPTS) and the register maintained by the State Commission for preventing sexual exploitation of children under 15.
5. Criminal record certificate (KRK) or foreign equivalent for non-Polish citizens; declaration of countries of residence over the last 20 years.
6. Required statements: clean criminal record and confirmation of familiarity/acceptance of the Standards (Annexes 2 and 3).
7. Printouts from registers are stored in the appropriate personnel/contract/volunteer/intern documentation.

Annex 2. Declaration of Clean Criminal Record and Commitment

…….. (place, date)

…….. (name and address of the Foundation)

I, …… (full name), PESEL…… , declare that I have not been convicted of offences against sexual freedom and morality, nor of offences involving violence against a minor; no criminal or disciplinary proceedings are pending against me in this respect. I am aware of the criminal liability for making a false statement.

…….. (date and legible signature)

Annex 3. Staff/Associate Acknowledgement of Familiarity with the Standards

…….. (place, date)

I, the undersigned……(full name), acknowledge that I have read the FRAME Child Safeguarding Standards, and I undertake to comply with them, in particular to report any breaches.

…….. (date and legible signature)

Annex 4. Intervention Record

Date and time of incident: .....

Reporting person (name, role): .....

Child's data (initials, age): .....

Description of incident/circumstances:

.....

Actions taken (intervention steps): .....

Authorities/services notified (who, when): .....

Person responsible for intervention: .....

Signature of the person completing the record: .....

Annex 5. Child-friendly Short Version

- Every child has the right to safety and respect.
- We do not accept physical, verbal or psychological violence.
- Your feelings and opinions matter – you can express them safely.
- Everyone is equal here – there is no place for discrimination or favouritism.
- If you feel unsafe, tell an adult at the Foundation – we are here to help.
- We respect everyone's privacy and personal boundaries.

22/10/2026, Lodz

Podpisano przez/ Signed by:
MARTA
KĘDZIA
Data/ Date: 22.10.2026 11:10
mSzafir

.....

President of the Board

Based on: national regulations and 'Keeping Children Safe Child Safeguarding Standards'.