CHILD SAFEGUARDING POLICY
OCALENIE FOUNDATION

1. Statement regarding the Child Safeguarding Policy

According to the Ocalenie Foundation every child we come in contact with is entitled to protection from all forms of harm, abuse, neglect and exploitation regardless of circumstances such as age, gender identity, socio-economic status, ability, sexual orientation or ethnicity. That's why the Foundation will not tolerate abuse and exploitation of children both by employees and other persons committed to implementation of the Foundation's activities including persons associated with the Foundation on the basis of civil law agreements or volunteering contracts.

The Ocalenie Foundation commits itself to protecting children in the course of its work through three areas: prevention, reporting and response. All employees of the Foundation are required to read this Policy and to declare that they have read this Policy and undertake to comply with it prior to the fulfillment of their official duties or any tasks associated with the activities of the Foundation. It also concerns associates of the Foundation, especially those cooperating on the basis of civil law agreements, including subcontractors signed up by the Foundation to conduct any activities in its name, and volunteers. If an employee or an associate of the Foundation violates the guidelines in this Policy, the Foundation will react adequately to the situation; it does have the right to take disciplinary action in the case of employees, to hold associates contractually liable or to terminate the contract with immediate effect.

All children participating in the Foundation's programmes and their legal guardians are also made aware of this Policy, which is done by posting the Policy on the following website: www.centrum.ocalenie.org.pl, posting the Policy in all the Foundation's offices in areas accessible to the clients - in full and in an abridged version for children (the abridged version contains information relevant to children), sending the content of the Policy and its updates by email to legal guardians at the e-mail addresses given in the application forms for Foundation programmes or other documents/information provided to the Foundation by Clients (in the case of children Clients or if their legal guardians don't use electronic mail the person in charge of the Child SafeguardingPolicy sets a meeting with the Client and a legal guardian during which they present a copy of the updated Policy at the Foundation's premises, which is confirmed by the signatures of the Client and the legal guardian) and introducing children beginning participation in the programme to the Policy within one month of joining the programme.

2. Basic terms included in the Policy

Terms used in the Child Safeguarding Policy mean:

child's personal data - all information on an identified or identifiable child (person who data belongs to); an identifiable child is a minor who can be identified, directly or indirectly, in particular by reference to an identifying trait such as their name and surname, identification number, location data, Internet ID or one or more specific factors that define the physical, physiological, genetic, mental, economic, cultural or social identity of an individual

child – a minor

the Foundation – the Ocalenie Foundation

Client – any person regardless of age who participates in any of the programmes conducted by the Ocalenie Foundation or who directly benefits from the help of the Ocalenie Foundation, on the basis of (at minimum) the consent to the processing of personal data on the basis of which the person has been admitted to the Ocalenie Foundation's programmes or assistance

person in charge of the Child Safeguarding Policy/person in charge of the Policy – employee of the Foundation who has received training concerning the Child Safeguarding Policy provided by the Foundation designated by the Management Board to monitor and update procedures and resolutions included in the Policy (after the Management Board's prior acceptance), acting as the first point of contact for those suspecting child abuse and setting in motion individual procedures in agreement with the Management Board

child's legal guardian – parent or legal guardian; according to this Policy a foster parent is also a legal guardian

employee – any person employed by the Ocalenie Foundation on the basis of an employment contract

associate – any person performing tasks for the Ocalenie Foundation on a basis other than a contract of employment - tasks on the basis of a civil law contract or other cooperation agreements**,** especially including subcontractors, volunteers; trainees; interns; consultants; coaches; persons visiting the Foundation as part of exchange or cooperation programmes

volunteer – any person performing tasks for Ocalenie Foundation on the basis of an agreement concluded with the Foundation on the provision of voluntary services

Policy/Child Safeguarding Policy – the present Child Safeguarding Policy by the Ocalenie Foundation

Management Board - team of persons listed in the National Court Register, authorized to decide on the Foundation's activities and to represent it

child's legal guardian's consent – consent of at least one legal guardian of the child. In the event of disagreement between the child's legal guardians about the child's significant matters, the following should be informed of the requirement that the case be decided by a family court pursuant to Article 97 § 2 of the Act of 25 February 1964 Family and Guardianship Code (i.e. Journal of Laws 2023, item 2809).

3. Purpose of the Child Safeguarding Policy

The Policy's objective is protection of children participating in activities conducted by the Foundation from any harm resulting from:
- conduct of employees and associates of the Foundation;
- conduct of persons participating in activities carried out by the Foundation as Clients of the Foundation;
- the preparation and implementation of the activities carried out by the Foundation.

The Policy defines commitments made by the Foundation and serves as a source of information for every employee and associate (including subcontractors and volunteers) about their duties in relation to the protection of children in the performance of their official duties or taking any action in relation to the performance of their official duties.

4. Definition of child abuse

According D.G. Gill's definition, child abuse is any action or inaction by individuals, institutions or society as a whole and any result of such action or inaction that tramples on 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 intentional use of physical force against a child that causes or is likely to cause physical injury or endanger the child's health, development or dignity.

Emotional violence– is a long-term, non-corporeal, harmful interaction with a child that may negatively affect the child's development. It can take the form of both action and inaction. It includes forms of behavior such as verbal aggression, shouting, rejection, isolation of the child, threats, developmentally inappropriate interaction with the child, etc.

Sexual exploitation– any behavior that leads to the child's involvement in any activity of a sexual nature with the intention of gratifying the sexual arousal of an adult. Sexual exploitation includes both behavior with and without physical contact, such as exhibitionism, pornography, obscene phone calls or verbal harassment.

Neglect - is the non-fulfilment of a child's basic needs, both physical, such as proper nutrition, clothing, health care, education, and psychological, such as feeling safe, experiencing love and care.

Commercial exploitation - exploitation of a minor in work or other activities for the benefit of others and to the detriment of the child's physical or mental health, education, moral or socio-emotional development.

5. Methods of child abuse prevention

The Foundation undertakes a number of measures to ensure that its employees and associates working with the Foundation do not pose a risk to the safety of children and to prevent child abuse at any stage of the Foundation's activities.

5.1. Design of Foundation's activities

The Foundation is committed to ensuring that all its activities are planned and implemented in a manner that respects the dignity of children and ensures their safety. It undertakes:

a. to carry out needs assessments and plan projects taking into account the provisions of the Child Safeguarding Policy and the need for all persons involved in project implementation to comply with them;
b. to commit to identifying risks of child abuse at the project planning stage and incorporating strategies to address them;
c. to monitor projects in terms of compliance with the Child Safeguarding Policy and react to any abuses and risks;
d. to provide a safe space for all activities in which children participate in the Foundation's projects;
e. to ensure that children are cared for by a trained adult at all times during the activities covered by the Foundation's projects and, in the event of the participation in the above activities of Clients who are children with disabilities or children with special educational needs, the participation of properly trained adults and, if necessary, the participation of persons assisting the children in the Foundation's activities.

5.2. Recruitment of employees and associates of the Foundation

5.2.1. The Foundation ensures that the people it employs or who work with the Foundation are qualified to work with children and are safe for them. In order to verify the above, the Foundation may request data concerning education, professional qualifications, and previous employment history from the persons participating in the recruitment process.

5.2.2. All persons involved in the recruitment process for positions involving contact with children as part of the children's participation in the Foundation's programmes are checked against the Sexual Offenders Register before the Foundation engages with them, in particular during the recruitment process, at its final stage, i.e. before the person involved in the recruitment is invited for an interview and, in the case of volunteers, where no interview is conducted, before the volunteer person is allowed to carry out the tasks.

5.2.3. The Foundation documents the fact of checking the person against the Sexual Offenders Register by means of a printout of information on the individual from the Sexual Offenders Register and attaching the printout to the individual's personal file in the case of an person employed under an employment contract, or to analogous documentation (e.g. personal file) in the case of an associate of the Foundation.

5.2.4. Regardless of the verification referred to in sections 5.2.2 to 5.2.3 above, prior to signing a contract with a person participating in the recruitment process, who will be qualified to become an employee or an associate of the Foundation (including

prior to signing an agreement on the provision of voluntary services with a volunteer), the Foundation will collect the documents referred to in sections 5.2.5 to 5.2.8 below from the person participating in the recruitment process. It is also required from all recruited persons (employees and associates, including volunteers) to submit a certificate of no criminal record or pending criminal and disciplinary proceedings against them even before signing the agreement to perform volunteer services.

5.2.5. The Foundation collects information from the National Criminal Register on the absence of a criminal record for offenses defined in Chapters XIX and XXV of the Criminal Code, in Articles 189a and 207 of the Criminal Code and in the Act on Counteracting Drug Addiction of 29 July 2005, or for corresponding offenses defined in foreign law from the person taking part in the recruitment process.

5.2.6. The Foundation collects a declaration of the country/countries of residence during the preceding 20 years, other than the Republic of Poland and the country of citizenship, submitted on pain of criminal liability together with information from the criminal records of these countries obtained for the purposes of professional or voluntary activities involving contact with children and, where the law of the country does not provide information for the purposes of professional or voluntary activities involving contact with children, information from the criminal records of that country.

5.2.7. If the person participating in the recruitment process is of a nationality other than Polish, the Foundation shall also collect the criminal record information of the country of nationality obtained for the purposes of professional or voluntary activity related to contact with children, or the criminal record information if the law of that country does not provide for the issuance of information for the purposes of professional or voluntary activity related to contact with children, in addition to the documents set out in paragraphs 5.2.5.-5.2.6 above.

5.2.8. If the law of the country from which the criminal record information referred to in paragraphs 5.2.6.-5.2.7. is to be submitted does not provide the issuing of such information or does not maintain a criminal register, the person participating in the recruitment process shall, on pain of criminal liability, make a declaration that they have not been validly sentenced in that country for offenses corresponding to the offenses defined in Chapters XIX i XXV of the Criminal Code in art. 189a and art. 207 and the Anti-Drug Addiction Act of July 29th 2005 r. and there has been no other ruling against them in which they have committed such offenses, and that they are not under a court-mandated obligation (or other authorized body or the law) to comply with a prohibition to hold any or certain positions or to engage in any or certain professions or activities related to the upbringing, education, leisure, medical treatment, provision of psychological counseling, spiritual development, sports or the pursuit of other interests of minors, or to the care of minors.

5.2.9. In order to avoid any doubts it’s important to emphasize that the collection of the above documents takes place prior to signing a contract with the person participating in the recruitment process, who will be qualified to become an employee of the Foundation or an associate (including prior to the signing of an agreement on the provision of volunteer services with a volunteer). It is also required of all recruited persons (employees and associates of the Foundation, including volunteers) to submit a certificate of no criminal record or pending criminal and disciplinary proceedings against them even before signing the contract/agreement to perform volunteer services.

5.2.10. A person in a marital union or a person who allows for their children to be in a marital union cannot be an employee or an associate of the Foundation. It is also unacceptable for employees and associates of the Foundation to employ children or involve them in activities inappropriate for their age or in a way that could disrupt their education.

5.3. **Educational and instructional measures**

5.3.1. All employees and associates of the Foundation are trained regarding the binding Child Safeguarding Policy, especially with regards to the procedure of reporting suspicion of child abuse. Children participating in the Foundation's programmes may be trained regarding the matter described above.

5.3.2. The participation of employees and associates of the Foundation in training mentioned in paragraph 5.3.1. is documented by signing a list of attendance by the employees, associates and volunteers of the Foundation. After the training's conclusion the attendance list is immediately forwarded to the person in charge of the Child Safeguarding Policy by the trainer.

5.3.3. The Foundation provides its employees and associates with education/access to internal training on child protection and assisting children in the case of suspicion of child abuse at least once a year. The training is conducted by the person in charge of the Policy.

5.4. **Rules concerning safe child (Client of the Foundation) – adult (employee/associate of the Foundation) relationships**

5.4.1. All contact between the Foundation's employees' and associates' and a child who is a Client of the Foundation occurs with full respect of the child's dignity with special regard to their right to protection from abuse.

5.4.2. All contact between the Foundation's employees, associates and volunteers and a child who is a Client of the Foundation or the child's legal guardian occurs exclusively via professional email addresses or cellphones of employees and associates of the Foundation and only with regards to matters concerning the Foundation's programme in which the child is involved subject to paragraph 5.4.5. below.

5.4.3. The Foundation's employees and associates, while adequately fulfilling their official duties or responsibilities included in their civil right agreements are required to act within the binding laws, decisions arising from internal documents of the Foundation, especially with regards to the Policy, as well as act within the limits of their professional abilities.

5.4.4. Any employee or an associate of the Foundation should never remain alone with a child without an additional adult present, which particularly refers to remaining with a child in a room, a car or any other space isolated from third-party persons, subject to the rest of the provisions of this paragraph. In the case of meetings outside of the Foundation, conducted within the Foundation's programme, the meeting should take place in a public space with the consent of the child's legal guardian or in the child's home where the legal guardian (or another adult specified by the legal guardian) should be present. In the case of one-on-one meetings in the Foundation the door to the room in which the meeting is taking place should

stay open or ajar. Meetings with a psychologist or a psychotherapist are exempt from this rule. Exceptions from this rule are allowed in special cases, only with the consent of a manager after consultation with the person in charge of the Child Safeguarding Policy and with prior consent of the child's legal guardian. In the case of the imperative to save the child's life or health, when calling an ambulance is not possible or waiting time for the ambulance's arrival gives legitimacy to undertaking other life-saving actions it is allowed to transport the child to the nearest hospital by an employee or associate of the Foundation after informing the child's legal guardian about the apparent situation and the hospital's address. Then, especially in the case of special justification it is allowed for an employee or associate of the Foundation to remain in a car with the child without another adult present, particularly if other adults (including other employees and associates of the Foundation) are obligated to provide care to other children.

5.4.5. Employees and associates of the Foundation cannot invite a child over to their home or any other isolated space within any of the Foundation's programmes or fulfilling any duties and activities within the Foundation's programmes. They also cannot provide the children with their home address. Direct phone communication between an employee or associate and a child is allowed with the consent of a manager and the consent of the child's legal guardian exclusively regarding matters of the programme that the child participates in.

5.4.6. During trips organized by the Foundation, within the programmes or any trips where employees, associates and Clients who are children are participants, no associate or employee can sleep in the same room as a child. In justified cases it may take place only with the child's legal guardian's consent and only in the case of provision of a separate bed for the employee or associate of the Foundation, as well as providing the presence of another adult who is a manager of the employee or associate of the Foundation, who retains access to the room.

5.4.7. The person planning the trip or other activities organized within the activities of the Foundation accessible to Clients who are children should take into account the culture and customs of the child each time, particularly their dietary restrictions, providing them free access to all activities with respect to their individual culture as well as particular needs of children with disabilities or children with special educational needs.

5.4.8. Notwithstanding the provisions in paragraphs 5.4.4.-5.4.6. above, any acts that may be categorised as child abuse within the meaning of point 4 above are unacceptable, particularly:

5.4.8.1. engaging in sexual or romantic relationships with children or behaving in a provocative, inappropriate or inadequate manner towards them as well as behaving in a manner beyond the nature of the relationship resulting from the child's participation in the Foundation's programmes or activities;

5.4.8.2. application of corporal punishments;

5.4.8.3. serving/buying children alcohol, energy drinks, cigarettes or any other psychoactive drugs as well as ingesting the substances specified above in the presence of children or remaining under the influence of said substances in the presence of children;

5.4.8.4. inappropriate physical contact with a child that violates their freedom or dignity and which goes beyond contact naturally resulting from play or the need to provide safety to the child;

5.4.8.5. any acts that degrade, embarrass or humiliate children;

5.4.8.6. maintaining private contact and relationships with a child outside of the Foundation's activities, including remaining in contact through social media, Internet communicators.

5.5. **Rules concerning safe child-child relationships**

5.5.1. Children participating in programmes and other activities of the Foundation are required to treat other participating children with respect and dignity.

5.5.2. In peer-to-peer (child-child) relationships it is prohibited to engage in any acts that may be categorised as child abuse, particularly: recording the image of another child without their consent or in intimate, hurtful or embarrassing situations, in incomplete clothing, with no clothing or in situations in any way portraying the child in a mocking manner, as well as exporting the image. Materials recorded or exported in violation of this paragraph should be deleted immediately, no later than at the first request of the Foundation.

5.5.3. Paragraph 5.4.8. is applied respectively, exclusive of paragraph 5.4.8.6.

5.6. **Rules of safe Internet access within the activities of the Foundation**

5.6.1. All computers and laptops to which the children participating in the Foundation's programmes have access to, during both individual and group work, as well as public networks in the Foundation's offices, have blockades preventing the children's access to harmful content understood as content portraying nudity and violence.

5.6.2. Usage of the Foundation's equipment by children occurs under the supervision of an employee or an associate of the Foundation.

5.6.3. The Foundation regularly updates the software keeping the children safe from access to content that can pose a threat to their optimal development.

5.6.4. In the case of a situation in which a child could or has come into contact with harmful content during the usage of a computer or laptop provided by the Foundation or the usage of the Foundation's public network, an employee or associate of the Foundation immediately informs the person in charge of the Policy of the occurrence, who then informs the child's legal guardian.

6. Procedures for reporting suspected cases

6.1. In the case of suspicion of child abuse every employee and associate of the Foundation is **obliged to** immediately inform their manager, the Management Board or the person in charge of the Child Safeguarding Policy about the occurrence. In the case of reporting to the person in charge of the Child Safeguarding Policy, the report can be done in person or via email, by emailing the address: **ochronadziecka@ocalenie.org.pl**. In the case of reporting to the manager or a person within the Management Board, the report may be done in person or via email, by emailing the personal address of a particular person, to which the report is being done. In the case of reporting through a verbal notification the person receiving the report is obliged to draw up an official note concerning the received report and immediately forward it with all received information to the following email address: **ochronadziecka@ocalenie.org.pl**.

6.2. The email address specified in paragraph 6.1. above is regularly checked by the person in charge of the Child Safeguarding Policy. Each report, including verbal and written notifications, is treated with seriousness and meticulously checked.

6.3. Depending on the reported situation, the person in charge of the Child Safeguarding Policy sets adequate procedures, specified in point 7 below, in motion - in agreement with the Management Board and the person in charge of the specific programme in which the child participates.

6.4. Persons reporting suspicion of child abuse and persons who the suspicion of child abuse has been reported to, as well as witnesses of the event, are obliged to keep any information on the event and on the Client of the Foundation confidential exclusive of measures essential within the intervention procedures specified in point 7 below as well as this point.

6.5. The Management Board stores information acquired from the person in charge of the Policy in accordance with paragraph 6.1. above in a digital folder dedicated to storing the information specified above using Internet tools and Google services and includes the information in an electronic report register.

7. Procedures for intervention (internal and external)

7.1. Each report of suspicion of child abuse is treated with full seriousness and meticulously checked by the employees and associates of the Foundation in order to assess risks. Depending on the reported case the Foundation undertakes either an internal intervention or both an internal and an external intervention.

7.2. Each intervention begins with notifying the child's legal guardian of the suspicion of abuse as long as it doesn't endanger the child's welfare.

7.3. Employees and associates of the Foundation taking part in the interventions (regardless of their role in the intervention, in particular as: person concerned by the report, person about whom the report is about; person who is a witness to the reported event) are required to keep information on the reported event and on the Foundation's Client confidential exclusive of measures within procedures for intervention specified in point 7. The persons specified above submit a declaration of confidentiality in accordance to the template included in the attachment nr 1 of the Policy before accession to explanatory proceedings or before accession to participation in explanatory proceedings.

7.4. **Internal intervention**

7.4.1. An internal intervention takes place within the Foundation if:

7.4.1.1. a child divulges an experience of child abuse by an employee or associate of the Foundation or a legal guardian of the child submits a report at the following address: ochronadziecka@ocalenie.org.pl;

7.4.1.2. a suspicion of child abuse is reported by an employee or an associate of the Foundation or by a volunteer;

7.4.2. Immediately after receiving a report of suspicion of child abuse the person in charge of the Child Safeguarding Policy takes the steps necessary to assess the situation along with the manager of the programme the child participates in, the Management Board and if the situation calls for it, a psychologist.

7.4.3. Depending on the assessment a conversation in a space safe for the child is carried out, either with the child or with the child and their legal guardian in order to determine further steps and draw up a help plan as well as provide support adequate to the child's needs. Then a conversation with an employee or associate of the Foundation takes place and, if possible, with witnesses of the event in order

to assess it. Guidelines concerning carrying out conversations within interventions with adults are included in attachment no. 2 of the Policy.

7.4.4. In the case of a report regarding negative behaviors not categorized as crimes against the child's welfare – discrimination, exclusion, ridiculing, etc. with an employee or an associate of the Foundation, after the conversation specified in 7.4.3. above, the person in charge of the Policy writes down a report containing arrangements that aim to halt further abuse and immediately forwards the report to the Management Board which decides on further steps. A template of the report is included in the attachment no. 3 of the Policy. The Foundation may adopt preventive measures such as limiting the contact of the person concerned by the report with children, as well as adopt disciplinary measures adequate to the situation including termination of the employee's contract and immediate termination of the contract with the Foundation's associate in case of associates.

7.5. **External intervention**

7.5.1. If internal intervention is insufficient or if a reported case involves a legal obligation to notify external authorities, an **external intervention** takes place, which involves taking legal steps to notify the relevant institutions.

7.5.2. The decision to undertake an external intervention is made by the Management Board based on the report specified in paragraph 7.4.4. above.

7.5.3. An external intervention is set in motion in the case of confirmed suspicion of abuse or suspicion of a crime committed against a child's welfare. An external intervention takes place independently from the internal intervention.

7.5.4. In the case of suspicion of a crime committed against a child's welfare the Management Board immediately notifies the police or the prosecutor's office. This obligation is of a legal nature and results from art. 304 of The Code of Criminal Procedure.

7.5.5. The child's guardians are immediately notified of the situation. A help plan is drawn up in cooperation with the guardians and in accordance with the child's needs.

7.6. **Intervention in case of peer abuse**

7.6.1. Where there may have been peer abuse (abuse of a child by another child participating in the Foundation's programmes or activities), a psychologist cooperating with the Foundation carries out a conversation with the child suspected of abuse and their legal guardian and a separate conversation with the child who may have experienced abuse and their legal guardian in order to determine the course of the incident. The person carrying out the conversations writes down a report of intervention containing a summary of arrangements resulting from the conversations according to the template in attachment no. 3 to the Policy and immediately forwards it to the Management Board.

7.6.2. The Management Board looks over the intervention report taking into account the nature of the specified incident and decides on taking further steps, which may include , particularly:

7.6.2.1. setting up a remedial plan to change undesirable behavior;

7.6.2.2. enabling the child to receive psychological care;

7.6.2.3. permanent or temporary exclusion of the child committing abuse of other children from the programmes and activities of the Foundation.

7.6.3. If a person suspected of abuse is a child aged 13 to 17 and their behavior might be a punishable act, the Management Board informs the locally appropriate family court or the police by way of a written notification.

7.6.4. If the person suspected of abuse is a child over 17 years old and their behavior might be a punishable act, the Management Board immediately notifies the police or the prosecutor's office.

8. Monitoring and periodic verification of the Policy

8.1. The person in charge of the Child Safeguarding Policy revises the binding Child Safeguarding Policy of the Foundation once every two years or, if necessary, more frequently. The conclusions of the periodic review of the Policy referred to in the preceding sentence shall be documented in writing by the person in charge of the Policy and communicated to the Management Board at least once every two years, following which the Management Board may update the Policy to ensure that it is as effective as possible.

8.2. The person in charge of the Policy informs all employees and associates of the Foundation of any changes each time by sending the updated Policy to the official emails of all employees and associates of the Foundation. If there is no official email address, the updated Policy is sent to the email address provided in contracts signed with the Foundation. The updated Policy is also sent to Clients who are children and their legal guardians to the email addresses provided in application forms to the Foundation's programs in which the children participate in. If Clients who are children or their legal guardians don't have an electronic inbox the person in charge of the Policy sets a meeting at the Foundation's office with the Client and their legal guardian during which a copy of the updated Policy is presented, which is then confirmed by the Client's and their legal guardian's signatures. The updated Policy is also made available on the Foundation's website and put on display at the Foundation in a visible space.

8.3. Employees, associates of the Foundation, Clients who are children and their legal guardians are able to add comments to the Policy in order to ensure its effectiveness by way of electronic correspondence sent to the person in charge of the Policy: ochronadziecka@ocalenie.org.pl.

8.4. The person in charge of the Policy, presents a report of the comments to the Management Board at least once every two years according to paragraph 8.3. above.

9. Rules on the protection of personal data and the child's image

9.1. A child's data is protected under the terms of the Act of May 10 2019 on personal data protection and European Parliament's and European Council's (UE) Regulation 2016/679 of April 27 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and the reversal of the 95/46/WE directive ("general data protection regulation", „RODO"). Detailed information about the aims and ways of processing personal data are provided separately in the context of each separate activity of the Ocalenie Foundation. Every employee and associate of the Foundation is required to retain confidentiality of personal data and ways of protecting data from unauthorized access, in accordance with the Foundation's security policy for the processing of personal data as well as to

comply with the principles set out in the general data protection regulation, in particular the principle of data minimisation.

9.2. The Foundation, recognising the child's right to privacy and protection of personal rights, ensures the protection of the child's image by not publishing the child's image without the written consent of the child's legal guardian and the verbal consent of the child themselves. Before recording the child's image, the child and the child's legal guardian must be informed of where the recorded image will be placed and in what context it will be used.

9.3. Any photos of the children taken by the Foundation's employees and associates, as well as all other recordings of the children's image, may be taken only with official equipment of the Foundation and shouldn't include images of children in provocative poses or in incomplete clothing, should always portray the child as a subject, never as a victim, respecting their right to dignity. An employee or an associate of the Foundation should make sure that no image or recorded story of a child makes it vulnerable to any forms of harm or violence. All photos, as well as all other material recorded by employees and associates of the Foundation including the images of children should relate to the Foundation's activities and result from it, while also serving only as a means of recounting the Foundation's activities (particularly reporting the course of workshops and other events organized by the Foundation with the participation of children), as well as preferably portray children in a group instead of solitary images of particular persons.

9.4. Within one month after the image of the child has been recorded (in particular, the taking of photographs or audiovisual material), an employee or an associate of the Foundation shall forward the recorded material (in particular, photographs, audiovisual material) to the person in charge of the program. The forwarding of the aforementioned material occurs via an official email address. Additionally, the employee or associate of the Foundation who has recorded the image of the child is required to permanently delete the images from their official equipment. The Foundation may at any given moment require the employee or associate of the Foundation to submit a statement confirming the removal of the aforementioned material from the equipment.

9.5. The person in charge of the program secures the forwarded material (specified in paragraph. 9.4. above) using Internet tools and Google services by placing the material in a dedicated folder with access restricted only to the person in charge of the Policy, employees or associates of the Foundation and the Management Board. The aforementioned material is stored in a dedicated folder up to the length of the period required in the grant agreement for implementation of activities in which the child's image was recorded. If there is no agreement the material may be stored up to December 31st of the year the activity was implemented in with the provision that the child's legal guardian (if the child is younger than 13 years old) or the child with the legal guardian's consent (if the child is aged 13 to 18) may give separate written consent to process the aforementioned material to a greater extent on the basis of rules agreed upon by the persons specified above with the Foundation. Regardless of the above, a legal guardian (if the child is younger than 13 years old) or the child with the legal guardian's consent (if the child is aged 13 to 18) may give separate written consent to process the child's image recorded during a photo shoot organized by the Foundation for promotion purposes. Participation in a photo shoot organized for promotional purposes may be paid.

9.6. In order to avoid any doubts it is emphasized that any recording of children's images with private equipment is forbidden.

9.7. It is forbidden for an employee or an associate of the Foundation to enable the media to record (film, photograph) the image of a child in spaces owned or rented by the Foundation or within activities outside of the spaces mentioned above with the participation of children without the consent of the child's legal guardian and the Management Board's written consent.

9.8. The Foundation ensures that employees, associates and volunteers of the Foundation are trained in the principles of child image protection.

10. Final provisions

10.1. The Policy is available on the Foundation's website and displayed in the Foundation's offices in a complete and abridged version for children.

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