



**CLIENT SAFEGUARDING POLICY
OCALENIE FOUNDATION**

1. Statement regarding the Client Safeguarding Policy

- 1.1. Ocalenie Foundation conducts its activities based on the principles of respect for the personal rights of beneficiaries from the activities of the Foundation, in particular their dignity, agency, honor and good name, and takes all necessary measures to ensure that in the framework of the activities carried out, there are no situations of risk of harm, abuse or negligence of clients, and that in the event of suspicion of such situations, to provide all persons involved in the activities of the Ocalenie Foundation and persons benefiting from these activities due protection, in particular through a functioning explanatory mechanism.
- 1.2. Specifically, the Foundation believes that every person who benefits from the Foundation's assistance or participates in the Foundation's programs or activities, regardless of their circumstances, including, but not limited to, gender, age, nationality, ethnic or religious affiliation, gender identity, economic and social status, fitness, psychosexual orientation, has the right to be protected from all forms of harm, abuse, neglect, exploitation and exploitation.
- 1.3. The Foundation shall not tolerate abuse and exploitation of clients both by employees and other persons involved in the implementation of its activities, including, especially, Foundation's associates under civil law contracts. If an employee or associate violates the guidelines of this Policy, the Foundation will respond appropriately to the situation, including, among other things, the right to take disciplinary action in the case of employees, hold associates contractually liable, or terminate the contract immediately.
- 1.4. All employees or associates, as well as clients, are required to submit a statement that they have read the Policy and agree to abide by it.
- 1.5. Due to the nature of the Foundation's activities, it is necessary for the effectiveness of the Foundation's activities to provide adequate space for safe relationships between the Foundation's employees or associates with clients, as well as relationships



between clients. Accordingly, also all clients receiving assistance from the Foundation or participating in the Foundation's programs or activities are required to comply with the principles set forth in the Policy.

- 1.6. The Policy is available on the Foundation's website and displayed in a prominent places at the Foundation's offices in complete and abbreviated versions for clients in Polish and other languages, as required.

2. Basic terms included in the Policy

Child – a minor;

The Foundation – the Ocalenie Foundation;

Sexual harassment – any unwanted behavior of a sexual nature towards an individual or relating to gender, the purpose or effect of which is to violate the dignity of that person, in particular by creating an intimidating, hostile, degrading, humiliating or derogatory atmosphere towards him/her/them; this behavior may consist of physical, verbal or non-verbal elements;

Client – any person of legal age receiving assistance from the Foundation or participating in any of its programs or activities;

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

Injured person – any client, employee or associate whose rights under this Policy have been violated;

Notifier – any client, employee or associate who reports an alleged breach of this Policy;



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 programs;

the Policy/Client Safeguarding Policy – this Client Safeguarding Policy by the Ocalenie Foundation;

Registry of notifications – a registry kept by the person in charge of the Policy to keep records of breaches of this Policy;

Sexual abuse – Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions;

Sexual exploitation – Any actual or attempted abuse of a position of vulnerability, differential power or trust, for sexual purposes. This includes, but is not limited to, profiting monetarily, socially or politically from the sexual exploitation of another;

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

3. Purpose of the Client Safeguarding Policy

- 3.1. The Policy's objective is to protect clients participating in the Foundation's activities from any harm they might suffer in the course of their cooperation with the Foundation, including harm resulting from:
 - 3.1.1. conduct of employees and associates of the Foundation;
 - 3.1.2. conduct of persons participating in activities carried out by the Foundation as clients of the Foundation;
 - 3.1.3. preparation and implementation of activities carried out by the Foundation.



- 3.2. The Policy also intends to clarify the principles to be followed by the Foundation's employees and associates in dealing with clients, as well as the principles to be followed by clients in dealing with the Foundation's employees or associates and in dealing with other clients.
- 3.3. For the avoidance of doubt, the Foundation indicates that this Policy applies to adults, due to the special nature of the protection required for children who benefit from the Foundation's assistance or participate in the Foundation's programs or activities (i.e. who are minor clients of the Foundation). In order to ensure an adequate level of such protection, the Foundation has a Child Safeguarding Policy that applies whenever an alleged violation involves a relationship with a minor client of the Foundation. The Child Safeguarding Policy also regulates the specific rules for the relationship of Foundation employees or associates (including volunteers) with minors who are clients of the Foundation.

4. Prevention activities of the Foundation

4.1. Design of Foundation's activities

- 4.1.1. In order to minimize the risk of adverse events within the framework of the Foundation's activities and related to the relationship of the Foundation's employees or associates with clients, the Foundation takes all necessary measures to ensure that its activities are planned, implemented, monitored and evaluated with respect for the dignity of clients.
- 4.1.2. In the activities planned and carried out, the Foundation acts in accordance with the principle of equality, non-discrimination and respect for the dignity of clients. The Foundation stipulates that some of its activities may be dedicated to particular groups of people, which does not contradict the principle of non-discrimination.
- 4.1.3. The Foundation commits itself to conducting needs research as part of the planning of the Foundation's activities in accordance with the principle of minimization and functionality, and planning projects taking into account the



provisions of the Client Safeguarding Policy and the requirement for all persons involved in the implementation of projects to comply with them. The decision to request a given survey/monitoring/evaluation should be made responsibly, taking into account the interests of the Foundation, especially in terms of effective implementation of projects, and the well-being of the participants, as well as appropriate management of funds.

4.2. **Educational and training measures**

- 4.2.1. All employees and associates are trained in the Foundation's Client Protection Policy, in particular in the procedure for reporting alleged breaches, which is confirmed by a signature of the employee or associate on the attendance list of the training in question on the aforementioned subject and a written statement by the employee or associate that he/she/they is familiar with the Policy, which at the same time includes an undertaking to comply with the Policy.
- 4.2.2. All clients are informed of the Client Safeguarding Policy by sharing the Policy on the website www.centrum.ocalenie.org.pl, displaying the Policy in all offices of the Foundation, in Polish and in the clients' languages selected by the Foundation, in places accessible to clients, or by sending the Policy and its updates via email to addresses provided in the Foundation's program application forms or other documents/information provided to the Foundation by clients. The Foundation reserves the right to allow clients to participate in the Foundation's programs or to benefit from the Foundation's assistance, subject to a written statement confirming that the client has read the Policy and commits to obey it.

4.3. **Rules concerning safe client – employee/associate relationships**

- 4.3.1. Any contact of the Foundation's employees or associates with the Foundation's client shall occur in full respect of the dignity of the client, and the Foundation's employees and associates shall treat clients equally (in particular, without differentiating them on the basis of gender, age, nationality, ethnic or religious affiliation, gender identity, economic and social status, fitness, psychosexual orientation), with the Foundation reserving the right to in justified cases direct



particular programs or activities to specific groups of people, in particular in connection with a specific situation occurring in a given geographical region, and then the aforementioned decision shall be made exclusively by the Management Board.

- 4.3.2. While performing their work duties or obligations under civil law contracts, employees and associates respectively, are obliged to act within the framework of applicable law, the provisions of the Foundation's internal documents, in particular the Policy, and to act within the scope of their competencies.
- 4.3.3. In order to ensure the highest level of professionalism, any contact of the Foundation's employees or associates with clients should take place only in the scope of performance of their work duties or duties under civil law contracts, and only during their work or performance of the aforementioned duties. The Foundation is not responsible for the contact of employees or associates with clients outside of work – in particular, this means that in connection with events that may constitute a violation of the principles set out in the Policy, and occurring outside the performance by the employees or associates of their duties under a contract with the Foundation, an investigation on the basis of the Policy may not be possible, which does not preclude the Foundation from taking action against the employees or associates on the basis of generally applicable laws or internal procedures and regulations in force at the Foundation.
- 4.3.4. Notwithstanding the provisions of Paragraphs 4.3.1.–4.3.3. above, any behavior that may constitute a violation of the principles of a safe relationship between an employee or associate and a client is unacceptable, and in particular any behavior that may constitute a physical or psychological abuse of a power relationship on the part of an employee or associate with respect to a client, including, but not limited to, intimidation, violation of physical integrity, harassment, sexual abuse or exploitation, raising one's voice, humiliation, blackmail, corruption, requesting or encouraging gifts, remuneration, goods or services in exchange for support or services provided, preventing free decision-making by clients in their affairs.



- 4.3.5. Clients are obliged to interact with employees or associates with respect for the dignity of employees and associates. In particular, any behavior that may violate the principle of respect for the dignity of employees or associates, including, but not limited to, referring to employees or associates in a vulgar, abusive, discriminatory, aggressive or demeaning manner, is prohibited. If a client violates this provision, the Foundation reserves the right to refuse service to the client, in particular to exclude the client from ongoing activities. If the aforementioned violation is of a severe nature or if the client repeatedly violates Foundation's policies, the Foundation reserves the right to permanently exclude the client in question from the program in which the client participates, and in justified cases (in particular, if the health or life of employees and associates or other clients is at risk) also to notify the appropriate external authorities, subject to Section 5.5.4 of the Policy.
- 4.3.6. It is unacceptable for employees or associates and clients to consume alcohol or any psychoactive substances, as well as to be under the influence of the aforementioned substances while participating in the Foundation's activities or programs.
- 4.3.7. Notwithstanding paragraph 4.3.6., in the event of suspicion of an intoxicated condition of a client, in order to protect employees, associates and other clients, the Foundation reserves the right to refuse service to the client, which means, in particular, exclusion of the client suspected of being intoxicated from ongoing activities, including requiring the client to leave the premises of the Foundation. In the case of repeated suspicion of intoxication of a client, the Foundation reserves the right to permanently exclude the client from the Foundation program in which the client participates.
- 4.3.8. It is forbidden to recommend to clients paid services provided by employees or associates or others (i.e. "advertising" paid services to clients by the Foundation), with the exception that the above does not include presenting to a client, upon request, a list of at least three persons, excluding employees and associates, institutions or other entities providing the services in question, and leaving the client with the opportunity to choose independently one of such persons, institutions or entities.



- 4.3.9. Due to the specific nature of the Foundation's activities, in order to maintain the highest level of ethics and transparency, employees and associates should be vigilant and concerned about clear and understandable communication with clients, and in particular, communicate with the client in such a way as not to mislead him/her/them with the information provided or make promises about the outcome of which the Foundation cannot commit itself or which are outside the scope of the Foundation's activities (such as the outcome of the visa procedure or social assistance).
- 4.3.10. Employees and associates act in good faith on the basis of information or documents provided by clients. Accordingly, it remains in the interest of the client to provide the Foundation (employees or associates) with complete and true information.
- 4.3.11. Clients, in all matters concerning them, should be given the opportunity to make their own decisions, which applies in particular to decisions regarding legal issues arising from consultations with employees or associates providing legal consultations or issues concerning professional decisions of clients. For the avoidance of doubt, it is emphasized that the Foundation is not responsible for decisions and the consequences of decisions made by clients on matters concerning them, even if they were previously consulted with employees or associates.
- 4.4. **Rules concerning safe client-client relationships**
- 4.4.1. Clients participating in the Foundation's programs and other activities are obliged to treat other clients with respect and dignity.
- 4.4.2. In the relations between clients, any behavior that may constitute a violation of bodily integrity, the principle of respect for dignity and, in particular, referring to other client/s in a vulgar, abusive, discriminatory, aggressive or degrading manner is prohibited.
- 4.5. **Monitoring and periodic verification of the Policy**



- 4.5.1. The person responsible for the Client Safeguarding Policy, in cooperation with the Management Board, shall review the Policy once every two years, or more often if necessary. Conclusions of the periodic review of the Policy shall be documented in writing by the person in charge of the Policy and reported to the Management Board at least once every two years, following which the Management Board may update the Policy to ensure its effectiveness.
- 4.5.2. The person in charge of the Policy shall inform all employees of any changes to the Policy each time by sending the updated Policy to the business email addresses of all employees, all associates by sending the updated Policy to the email addresses provided in the agreements with the Foundation (by which is also meant volunteer agreements), as well as clients by distributing the updated Policy to e-mail addresses provided in the application forms for Foundation programs in which they participate or other documents/information provided to the Foundation. The updated Policy shall be posted on the Foundation's website and displayed at the Foundation's offices in a visible place – in the languages selected by the Foundation for communication of clients.
- 4.5.3. Employees, associates and clients are given the opportunity to submit comments to the Policy in order to ensure its effectiveness through email correspondence sent to the person responsible for the Policy:
safeguarding@ocalenie.org.pl.
- 4.5.4. The person responsible for the Policy shall submit a report to the Management Board on the comments made pursuant to paragraph 4.5.3. at least once every two years.

5. Notifications regarding employees or associates submitted by employees or associates of the Foundation

Each notification, whether verbal or written, is treated with seriousness and carefully reviewed to assess an alleged breach, based on a survivor-centered approach.



Employees and associates are required to maintain the confidentiality of information related to the reported incident and the client, subject to the actions necessary under the procedures for intervention referred to in this Section 5. The aforementioned persons shall submit a confidentiality statement in accordance with the model attached as Appendix 1 to the Policy before proceeding with the investigation.

The Foundation shall take all necessary measures to ensure the protection of the reporting person and the affected person from attacks of retaliation in the event of a report concerning an employee or associate of the Foundation.

5.1. Design of Foundation's activities

- 5.1.1. In the case of alleged breaches of the provisions set out in the Policy by an employee or an associate, and in particular the principles set out in Section 4.3. of the Policy, each employee or an associate is obliged to immediately notify the supervisor of the employee or associate who allegedly committed the breach, to inform the Management Board or the person responsible for the Policy about the situation. In the case of notification directly to the person responsible for the Policy, notification may be made in person, or in documentary form by sending an e-mail to: safeguarding@ocalenie.org.pl. In the case of a report made to a supervisor or the Management Board member, the report can be made in person or in writing by sending an e-mail to the business name address of the person to whom the report is made.
- 5.1.2. In the case of a notification made verbally, the person to whom the notification was made is obliged to make a business note of the notification received, including, among other things, information on the time, place, persons involved and the course of the incident, and immediately forward it with all the information obtained to the e-mail address: safeguarding@ocalenie.org.pl. The person responsible for the Policy shall immediately forward the report and all information to the investigation team.
- 5.1.3. The e-mail address indicated in paragraph 5.1.1 is checked by the person responsible for the Policy regularly.



5.2. **Notifications concerning employees, associates or other clients made by a client**

- 5.2.1. In the case of suspected violations of the rules set forth in the Policy by an employee or associate of the Foundation, and in particular the rules set forth in Section 4.3. of the Policy, as well as suspected violations of the rules set forth in the Policy by another client, the client is entitled to report the situation to the employee or associate, either in person or in writing, in documentary form by sending an e-mail to: safeguarding@ocalenie.org.pl or through an electronic form on the website www.centrum.ocalenie.org.pl. If the report is made in a language that is not understood by the person receiving the report, a translator from outside the Foundation is engaged to translate the report.
- 5.2.2. In the case of a notification made verbally to an employee or associate in person, the person receiving the notification is required to make a business note of the notification and immediately forward it with all the information obtained to the e-mail address: safeguarding@ocalenie.org.pl. The person responsible for the Policy shall immediately forward the report and all information to the investigation team.
- 5.2.3. The e-mail address indicated in paragraph 5.1.1 is checked by the person responsible for the Policy regularly.

5.3. **Notifications concerning clients made by employees or associates**

- 5.3.1. In case of alleged breaches of the provisions set out in the Policy by a client, and in particular in a situation in which the behavior of a client violates the dignity of other clients, employees or associates, the employee or associate is obliged to report the aforementioned situation to the supervisor - verbally or in documentary form by sending an e-mail to the business name address of the supervisor in question or to the person responsible for the Policy to the following e-mail address safeguarding@ocalenie.org.pl.
- 5.3.2. In case of a notification made by e-mail sent to the aforementioned address, the person handling the given e-mail (i.e. the person whose business name



address is assigned to or the person responsible for the Policy) immediately forwards the notification and all attached information to the investigation team.

5.4. **The investigation team**

- 5.4.1. Notifications are processed by the investigation team, consisting in each case of the person responsible for the Policy and the supervisor of the employee or associate to whom the notification relates, in the case of volunteer persons – the person responsible for the Policy and the manager of the volunteer team and the manager of the program in which volunteer services are provided, and in the case of clients – the person responsible for the Policy and the coordinator of the program in which the client, to whom the notification relates, participates. The investigation team is appointed each time a notification is submitted.
- 5.4.2. The investigation is conducted in accordance with the Rules of Investigation referred to in sections 5.4.3–5.4.7.
- 5.4.3. The investigation must be carried out with due regard for the safety of the affected person, the reporting party, witnesses, and the subject of the complaint. Investigators must respect the rights, choices and dignity of the affected person, reporting party and witnesses, and ensure that they are treated equally and fairly. Investigators should also take all measures, to the greatest extent possible, to preserve the confidentiality of the affected person, reporting party and witnesses.
- 5.4.4. Investigators must be impartial, free from bias, conflicts of interest and base their findings on facts. Investigators must respect the rights of all parties involved and ensure due process of the investigation.
- 5.4.5. Investigators must be qualified and should follow best practices and standards in the conduct of investigations, coordinating with relevant experts and specialists where necessary. The investigation should be completed as soon as possible after receipt of the notification.



- 5.4.6. The investigation must follow a structured process and be conducted in a conscientious, complete, focused and rigorous manner. Investigators must ensure that all aspects of the investigation are thoroughly and adequately documented.
- 5.4.7. The investigation team shall prepare a report based on the template attached as Appendix 2 to this Policy. In the report, the team may include non-binding recommendations for further action, including, among other things, a proposal for sanctioning actions. The report shall be promptly submitted to the Management Board.

5.5. **Intervention and sanctioning measures**

- 5.5.1. In justified cases, after considering the report of the investigation team, the Management Board may take disciplinary measures against an employee or an associate, including the penalties provided for in the Labor Code or termination of the employment contract without notice through the fault of the employee - in the case of employees, or including termination of the contract with immediate effect - in the case of civil law contracts.
- 5.5.2. The Management Board shall store all information provided by the investigation team in a properly secured digital folder dedicated to storing the aforementioned information with the use of online tools and Google drive services, which can be accessed by the Management and the person responsible for the Policy, and include the aforementioned information in the Registry of Notifications.
- 5.5.3. The Registry referred to in Section 5.5.2. contains the following data: the date of notification, the date and anonymized description of the incident, the results of the investigation, the decision of the Management Board regarding sanctioning measures, and information on possible notification of external authorities. Access to the Registry is granted to the Management Board and the person in charge of the Policy, who is responsible for the accuracy of the data, maintenance of the Registry and deletion of data entered into the Registry. The information and data in the Registry are kept for three years from the



submission of the notification, each time after the end of the calendar year in which it has been submitted.

- 5.5.4. In the event that a reported case involves a legal obligation to notify external authorities, external intervention is undertaken by a person on the Management Board, which involves taking legal steps to notify the relevant institutions.
- 5.5.5. In the case of reports referred to in Section 5.3, the investigation team, after reviewing the report and the information provided, may take appropriate steps to ensure the safety and well-being of employees, associates and other clients, in particular by informing other employees and associates, up to and including excluding the client from the Foundation's programs.
- 5.5.6. Persons to whom the notifications referred to in paragraph 5.3. apply shall be notified of the result of the investigation in a language understandable to them.
- 5.5.7. The notifier shall be notified of the result of the investigation in a language he/she/they understands.

6. Rules on the protection of personal data and the client's image

- 6.1. A client'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 the free movement of such data and the reversal of the 95/46/WE directive ("general data protection regulation", GDPR). 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.



- 6.2. The Foundation, recognising the client's right to privacy and protection of personal rights, ensures the protection of the client's image by not publishing the client's image without their written consent. Before recording the client's image, the client must be informed of where the recorded image will be placed and in what context it will be used.
- 6.3. Any photos of the clients taken by the Foundation's employees and associates, as well as all other recordings of the clients' image, should be taken with official equipment of the Foundation and should always portray the client as a subject, never as a victim, respecting their right to dignity. An employee or an associate should make sure that no image or recorded story of a client makes it vulnerable to any forms of harm or violence. All photos, as well as all other material recorded by employees and associates including the images of clients should relate to the Foundation's activities and result from it, while also serving only as a means of reporting the Foundation's activities (particularly reporting the course of workshops and other events organized by the Foundation), as well as preferably portray clients in a group instead of solitary images of particular persons.
- 6.4. Within one month after the image of the client has been recorded (in particular, the taking of photographs or audiovisual material), an employee or an associate shall forward the recorded material (in particular, photographs, audiovisual material) to the manager in charge of the program, which the recorded image concerns. The forwarding of the aforementioned material occurs via an official email address. Additionally, the employee or associate who has recorded the image of the client is required to permanently delete the images from their official equipment. The Foundation may at any given moment require the employee or associate to submit a statement confirming the removal of the aforementioned material from the equipment.
- 6.5. The manager in charge of the program, which the recorded image concerns, secures the forwarded material (specified in paragraph. 6.4. 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 and the Management Board, as well as the Communication and Individual Fundraising Team and Collaboration and Advocacy Team. The aforementioned material is stored in a



dedicated folder up to the period required in the grant agreement for implementation of activities in which the client's image was recorded. If there is no agreement the material may be stored until the end of the related activities, with the provision that the client's consent may give separate written consent to process the aforementioned material to a greater extent on the basis of rules agreed upon by clients with the Foundation. Regardless of the above, client's may give separate written consent to process his/her/their image recorded during a photo shoot organized by the Foundation for advertisement purposes. Participation in a photo shoot organized for these purposes may be paid.

- 6.6. It is forbidden for an employee or an associate of the Foundation to enable the media to record (film, photograph) the image of a client in spaces owned or rented by the Foundation or within activities outside of the spaces mentioned above with the participation of clients without their and the Management Board's written consent.
- 6.7. Clients are forbidden to record or distribute the image of other persons participating in the activities of the Foundation, especially other clients, employees or associates without their consent. Materials recorded or distributed in violation of this provision must be removed immediately, no later than at the first request of the Foundation or the person whose image was recorded or distributed. The client who recorded or distributed the image shall be obliged to submit a written statement of completion of the actions referred to in the sentence above whenever requested by the Foundation or the person whose image was recorded or distributed.

7. Final provisions

- 7.1. The Policy is available on the Foundation's website and displayed in the Foundation's offices in a complete and abbreviated version for clients, in Polish and and other languages, as required.