

# CHILD RIGHTS PROTECTION STANDARDS

## Foundation for Freedom

### Preamble

The fundamental premise of the Child Rights Protection Standards is to ensure that all children have the right to respect, dignity, and protection from all forms of harm, particularly physical and psychological violence, discrimination, exploitation, abuse, and neglect.

At the Foundation for Freedom, we believe that effective child protection is achievable through the commitment of all individuals involved in the Foundation's activities, whether directly employed, cooperating, or volunteering. Our work is guided by the overarching principle of the child's best interest and well-being. Protecting children and upholding their rights is the duty of every person within the Foundation, and all personnel act within the framework of applicable laws, internal regulations, and these Standards.

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### Chapter I – Basic Definitions

#### § 1

- **Child** – Any person under 18 years of age (UNCRC, 1989), regardless of the legal age of maturity in their country of origin, also referred to as a minor.
- **Foundation** – Foundation for Freedom.
- **Personnel or Member of Foundation Personnel** – Any individual employed by the Foundation under an employment contract, civil law contract, or any form of collaboration

or volunteer agreement, including members of the Foundation's management board, interns, and all individuals acting on behalf of the Foundation.

- **Child's Guardian** – A person authorized to represent the child, particularly their parent or legal guardian.
  - **Child Abuse** – Any act constituting a criminal offense or punishable act committed against a child by any person, including Foundation personnel, or any situation that threatens the child's well-being, including neglect.
  - **Child's Personal Data** – Any information allowing for the identification of a child.
  - **Person Responsible for Standards** – A person appointed by the Foundation's management board to oversee the implementation, execution, and monitoring of the Standards.
  - **Management Board or Board Member** – A person representing the Foundation in accordance with its registration in the National Court Register.
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## Chapter II – Identifying and Responding to Child Harm Risk Factors

### § 2

1. Foundation Personnel are knowledgeable about child harm risk factors and symptoms and are responsible for monitoring children's well-being.
  2. Foundation Personnel are familiar with and adhere to the principles of safe relationships between Personnel and children, as well as among children themselves. These principles are outlined in **Annex 1** to the Standards.
  3. The recruitment of Foundation Personnel follows a strict safe recruitment policy, detailed in **Annex 2** to the Standards.
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## Chapter III – Principles and Procedures for Intervention in Cases of Suspected or Confirmed Child Abuse

### § 3

1. If Foundation Personnel suspect or receive information about child abuse, they are obligated to complete an **Intervention Report Form** (template provided in **Annex 4**) and immediately submit it (in writing or via email) to their direct supervisor and/or a Board Member.
2. The intervention process is conducted by the Foundation's Management Board, which may appoint a specific individual to handle all interventions or a particular case. The appointed individual's details (name, phone, email) will be shared with Personnel, children, and guardians.

3. Foundation Personnel must maintain confidentiality regarding information related to child abuse, except when sharing with authorized Foundation representatives or institutions as part of the intervention process.
  4. For the purposes of this document, child abuse is classified as follows:
    - a) A criminal offense committed against a child (e.g., sexual abuse, physical violence).
    - b) Other forms of non-criminal harm, including physical punishment, humiliation, or neglect of basic needs (such as nutrition, hygiene, and healthcare).
  5. Foundation Personnel must respond to child abuse according to its classification and the identity of the perpetrator. Specific intervention procedures are outlined in **Annex 3**, covering:
    - a) Suspected abuse by a **Member of Foundation Personnel**.
    - b) Suspected abuse by a **child's guardian or another adult**.
    - c) Suspected abuse by **another child**.
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## Chapter IV – Rules on Protecting Personal Data and the Child's Image

### § 4

1. The Foundation ensures the highest standards of personal data protection in compliance with applicable laws, particularly the **Personal Data Protection Act of May 10, 2019**, and **EU Regulation 2016/679 (GDPR)**.
2. Foundation Personnel must maintain the confidentiality of children's personal data and take precautions to prevent unauthorized access.
3. Children have the right to privacy and protection of their personal image. Photographing, filming, or audio-recording a child requires written consent from their guardian and verbal consent from the child (if their psychophysical development allows it), following prior notification about the intended use of their image.
4. Foundation Personnel may not permit third parties, including media representatives, to capture children's images without written consent from their guardians.
5. In order to obtain the consent mentioned above, a Member of the Foundation's Staff may contact the child's guardian and establish the procedure for obtaining consent. It is strictly prohibited to provide the guardian's contact details to a third party without the guardian's knowledge and written consent.
6. The Foundation strives to minimize the risks associated with making children's images public, including by anonymizing photos and avoiding labeling photos/videos with identifying information about the child.
7. A child's image must always be presented with dignity. The child must not be depicted in partial clothing or provocative poses, and the context of the photo/video must not be degrading, humiliating, or present the child in a negative light.
8. Photos/videos of children should focus on the activities they are engaged in and, whenever possible, depict children in groups rather than as individuals.
9. If the Foundation hires a third party (such as a photographer or videographer) to record an event involving children, the Management Board will require that person to comply

with the principles outlined in this section. Additionally, guardians and children will be informed about the recording of their images.

10. When guardians or participants of Foundation-organized events record children's images for private use, they are informed that:
    - a. The use, processing, and publication of photos/videos containing the images of children or adults require the consent of those individuals, or, in the case of children, their legal guardians.
    - b. Photos/videos containing children's images should not be shared on social media or open platforms unless the children's guardians provide consent.
    - c. Before publishing a photo/video online, privacy settings should be checked to ensure control over who can access the children's images.
  11. If a child's image is only an incidental part of a larger scene—such as a gathering, landscape, or public event—guardian consent for recording the child's image is not required.
  12. Any suspected or confirmed cases of improper use of children's images must be reported to the Management Board immediately, which will take appropriate action to address and resolve the issue.
  13. If a child's guardians or the children themselves do not consent to recording their images, their decision will be respected by the Foundation.
  14. Materials containing children's recorded images are stored by the Foundation in compliance with legal requirements and in a secure manner. This includes keeping physical media in a locked cabinet and storing digital files in a protected folder with access restricted to authorized personnel processing children's data. These materials are kept for the legally required archival period and/or for a duration determined by the Foundation and agreed upon by the consenting legal guardian.
  15. Children's images are recorded using official recording devices or devices approved under the conditions set by the Management Board.
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## **Chapter V – Children's Internet Access Policy**

### **§ 5**

1. If the Foundation provides children with access to the Internet, it is obliged to take measures to protect them from content that may pose a threat to their proper development. In particular, software must be installed and updated to block malicious software and filter content.
2. Members of the Foundation's Personnel are required to inform children about the principles of safe Internet use, supervise the content accessed by children, and intervene in cases where inappropriate content is encountered.
3. The Management Board shall designate a person responsible for overseeing Internet access and the frequency of checks for harmful content when the Foundation provides unrestricted Internet access to children via electronic devices.

4. Where possible, the person responsible for the Internet or the person conducting activities involving Internet access shall organize periodic workshops on safe Internet use for children.
  5. If harmful content is found, the designated person shall attempt to determine who used the computer at the time such content was accessed.
  6. The designated person responsible for the Internet shall inform the Foundation's Management Board about any incidents and notify the child's guardians accordingly.
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## **Chapter VI – Implementation and Monitoring of Standards**

### **§ 6**

1. To implement the Standards, Foundation Personnel shall be introduced to their content through a dedicated training session, the aim of which is to familiarize Personnel with the Standards and intervention procedures. The Personnel's readiness to apply the Standards shall be documented by signing a written acknowledgment.
  2. The Management Board shall appoint an individual responsible for the implementation, execution, and monitoring of the Standards, as well as for receiving reports of incidents threatening children's safety and providing necessary support.
  3. The appointed person, at least once every two years from the effective date of the Standards, shall conduct an anonymous survey among Personnel to assess their familiarity with and application of the Standards. The survey template is provided in Annex 5.
  4. The appointed person shall analyze the survey responses and compile a monitoring report, which shall be submitted to the Management Board.
  5. If monitoring results indicate the need for changes to the Standards, the Foundation's Management Board shall introduce the necessary amendments and communicate them to the Personnel, children, and their guardians.
  6. The Management Board appoints Magdalena Zaborowska-Gumieniak as the person responsible for the Standards. Contact is available in Polish, Russian, and English via email: [magda@fundacjadlawolnosci.org](mailto:magda@fundacjadlawolnosci.org) or phone: +48 534 101 012 for any inquiries regarding the Standards.
  7. A change in the appointed person responsible for the Standards or their contact details does not require an amendment to the Standards. It suffices to inform the Personnel, children, and guardians through the established communication channels.
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## **Chapter VII – Final Provisions**

### **§ 7**

1. The Standards shall enter into force on the date of their announcement.
2. The Standards shall be made accessible to Foundation Personnel, children, and their guardians through appropriate channels, including posting in designated announcement areas, publication on the Foundation's website, email distribution, and provision of printed copies.
3. A summarized version of the Standards shall be made available to children in a manner appropriate to their comprehension levels and to their guardians.
4. The Standards are enacted by the resolution of the Foundation's Management Board.

**Warsaw, July 26, 2024**

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(Annexes in Polish.)