



Standards of Protection of Minors at International High School of Wrocław

Preamble - Introduction to the Document

The aim of the policy and procedure for the protection of minors from harm is to act for the well-being and in the best interest of the child. Increased awareness of risks enables more effective prevention and, consequently, the creation of an environment free from factors that may lead to the violation of children's rights.

In accordance with the school's mission, every teacher treats children with respect, taking into account their needs. We appreciate the individualism of each child while assisting them in developing the ability to cooperate and respect the rights of others.



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Legal Acts and Additional Sources on Which the Document Was Developed:

1. Convention on the Rights of the Child adopted by the United Nations General Assembly on November 20, 1989 (Journal of Laws of 1991, No. 120, item 526, as amended);
2. Constitution of the Republic of Poland of April 2, 1997 (Journal of Laws No. 78, item 483, as amended);
3. Act of February 25, 1964, Family and Guardianship Code (consolidated text Journal of Laws of 2020, item 1359);
4. Act of July 28, 2023, amending the Act - Family and Guardianship Code and certain other acts (Journal of Laws, item 1606);
5. Act of May 13, 2016, on preventing threats of sexual crime (consolidated text Journal of Laws of 2023, item 31, as amended);
6. Act of July 29, 2005, on preventing domestic violence (consolidated text Journal of Laws of 2021, item 1249);
7. Act of June 6, 1997, Penal Code (consolidated text Journal of Laws of 2022, item 1138, as amended);
8. Act of June 6, 1997, Code of Criminal Procedure (consolidated text Journal of Laws of 2022, item 1375, as amended);
9. Act of April 23, 1964, Civil Code (consolidated text Journal of Laws of 2022, item 1360, as amended) - articles 23 and 24;
10. Act of November 17, 1964, Code of Civil Procedure (consolidated text Journal of Laws of 2023, item 1550, as amended);
11. *International Baccalaureate (IB) Programme standards and practices*, published by IBO in October 2018 (last updated in April 2022);
12. *Standards for the protection of children in nurseries and educational institutions*, edited by Agnieszka Sotomska. Dajemy Dzieciom Siłę Foundation, 2023;
13. The Statute of International High School in Wrocław;
14. Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC.



Chapter I.

Basic Terminology

§ 1.

This document refers to:

1. **Head of School** - the Head of School International High School of Wrocław.
2. **School, institution** - International High School of Wrocław.
3. **Employee, personnel** - a person employed based on an employment contract, a contract for specific work, a mandate contract, or a voluntary work agreement at International High School of Wrocław.
4. **Partners cooperating with the School** - individuals performing assigned tasks within the School under separate regulations (e.g., photographers).
5. **Student** - any person enrolled on the list of students at International High School of Wrocław.
6. **A minor** - a person from birth to the age of 18, as defined in the Civil Code.
7. **Student's legal guardian** - a person authorised to represent and decide on behalf of the minor, especially their legal representative.
8. **Legal representative** - a parent or guardian with full parental authority or a legal guardian (a person representing the child appointed by the court, in situations where parental authority is not granted to parents or when parents are deceased).
9. **Consent of the minor's guardian** - the consent of at least one of the minor's parents. However, in case of disagreement between the guardians of the minor, they should be informed of the need to resolve the matter by the family court.
10. **Minor's abuse** - perpetrating of a prohibited act or a criminal act against the minor by any person, including a School employee, or a threat to the minor's well-being, including neglect. Abuse includes:
 - a. **Physical violence** - intentionally causing harm to the body, inflicting pain, or threatening harm to the body. Physical violence may result among other things in fractures, bruises, cuts, burns, and internal injuries. Physical violence causes or may lead to the loss of health or life endangerment.
 - b. **Emotional violence** - repeated humiliation, embarrassment, and mockery of the minor, constant criticism, involving the minor in conflicts between adults, manipulating the minor, lack of adequate support, imposing demands and expectations on the minor that they cannot meet.
 - c. **Sexual violence** - engaging the minor in sexual activity by an adult. Sexual exploitation refers to behaviours with physical contact (e.g. touching



the minor, engaging in sexual intercourse with the minor) as well as non-contact behaviours (e.g. showing the minor pornographic materials, voyeurism, exhibitionism).

- d. **Neglect** - failure to satisfy the minor's basic material and emotional needs by a parent or legal guardian, not providing them with adequate food, clothing, shelter, medical care, safety, and lack of supervision in the school obligation.
11. **Student's personal data** - any information enabling the identification of the student.
 12. **Person responsible for *the Standards of Protection of Minors*** - an employee appointed by the employer overseeing the implementation of these Standards.
 13. **Person responsible for the Internet** - an employee designated by the employer overseeing the use of the Internet by students on the School premises and the safety of minors on the Internet.
 14. **Employer** - the governing body of International High School of Wrocław - the Foundation of International Education.

Chapter II.

Rules Ensuring Safe Relationships Between Minors and Facility Staff, Including Safe Employee Recruitment Principles.

§ 2.

1. Principles of secure employee recruitment:
 - a. An employer or an individual designated by the employer, prior to establishing an employment relationship or allowing an individual to engage in activities related to the upbringing, education, leisure, treatment of students, or care for them, is obligated to obtain information on whether the individual's data is listed in ***the Registry with limited access*** or ***the Registry of individuals*** for whom the State Commission for Combating the Sexual Exploitation of Minors under 15 years of age has issued an entry order.
 - b. The employer or the individual designated by the employer obtains information from the Registry with limited access through the teleinformatics system maintained by the Minister of Justice. Initially, an account must be created in the teleinformatics system, and the account is subject to activation by the information office.



- c. The Registry of individuals for whom the State Commission for Combating the Sexual Exploitation of Minors under 15 years of age has issued an entry order is publicly accessible and does not require the creation of an account.
- d. Feedback received from the teleinformatics system is printed and submitted to personnel associated with establishing an employment relationship. The same applies to the Registry of individuals for whom the State Commission for Clarifying Cases of Actions against the Sexual Freedom and Morality of Minors under 15 years of age has issued an entry order. In the case of the latter Registry, it suffices to print the webpage stating that the individual is not listed in the registry.
- e. The employer or the individual designated by the employer obtains information from the National Criminal Register about the lack of a criminal record.
- f. If the candidate holds citizenship other than Polish, they should also submit information from the criminal register of the country of citizenship, obtained for the purposes of professional or voluntary activities related to interactions with minors, or submit information from the criminal register if the law of that country does not provide for issuing information for the aforementioned purposes.
- g. The employer or the individual designated by the employer requests a statement from the candidate regarding the countries (other than the Republic of Poland) where they resided in the last 20 years under the penalty of criminal responsibility.
- h. If the law of the country from which information on the lack of a criminal record is to be submitted does not provide for issuing such information or does not maintain a criminal register, the candidate submits, under the penalty of criminal responsibility, a statement to this effect along with a statement that they have not been finally convicted and no other judgement has been issued against them stating that they have committed prohibited acts, and that there is no obligation arising from a court judgement, another authorised body, or law to comply with a ban on holding any or specific positions, performing any or specific professions, or engaging in activities related to the upbringing, education, leisure, treatment, psychological counselling, spiritual development, sports, or other interests of minors, or caring for them.
- i. Under the statements made under the penalty of criminal responsibility, a statement is submitted with the following content: *I am aware of the*



criminal responsibility for submitting a false statement. This statement replaces the warning of the authority about the criminal responsibility for submitting a false statement.

2. The template for the statement of no criminal record and ongoing investigative, judicial, and disciplinary proceedings is attached as **Appendix no. 1** to these Standards.

§ 3.

1. Principles of Safe Relationships Between School Staff and Students:
 - a. The fundamental principle guiding all activities undertaken by the school staff is to act for the well-being and in the best interest of the students. According to the school's mission, every teacher treats children with respect, and takes into account their needs. We appreciate the individuality of each child while helping them develop the ability to collaborate and respect the rights of others.
 - b. Staff members, in implementing the standards, operate within the applicable law, internal regulations of the institution, and their competencies.
 - c. The principles of safe relationships between staff and students apply to all employees, interns, and volunteers.
 - d. Familiarity with and acceptance of these principles are confirmed by signing a declaration, the template of which is attached as **Appendix no. 2** to these Standards.
2. A school employee is obligated to maintain a professional relationship with children and to carefully consider whether their response, communication, or actions toward a child are appropriate, safe, justified, and fair to other children on each occasion.
3. A school employee must act openly and transparently to minimise the risk of misinterpretation of behaviour.
4. In interactions with students, a school employee:
 - a. demonstrates patience and treats the student with respect;
 - b. attentively listens to students and strives to provide responses tailored to the situation and the student's age;
 - c. does not shame, belittle, humiliate, or insult students;
 - d. does not shout unless the situation requires it (e.g. a warning in a dangerous situation);
 - e. does not disclose sensitive information about a student to unauthorised persons.



5. Decisions concerning a student should always consider their expectations but also take into account the safety of other students.
6. In cases where it is necessary to talk to a student privately (without a witness of any other student), the employee should ask another staff member to participate in the conversation. This does not apply to situations related to the teaching process, e.g. individual consultations or ordinary pedagogical interventions, e.g. pointing out inappropriate behaviour once the lesson has ended. Nevertheless, every such conversation should be held in a room with a glass door. If the room does not have a glass door, the door should be left open.
7. In the presence of students, a school employee is not allowed to make inappropriate jokes, use vulgar language, make offensive gestures, or express content with a sexual connotation.
8. A school employee is not allowed to use physical force (advantage) or threats.
9. A school employee is obligated to treat students equally, regardless of their gender, sexual orientation, religion, ethnic origin, or disability.
10. A school employee is obligated to maintain confidentiality regarding students' information including their health, developmental and educational needs, psycho-physical abilities, sexuality, sexual orientation, racial or ethnic origin, political views, religious beliefs, or worldviews. If it is necessary to waive confidentiality, the employee should explain to the student the need for such action as soon as possible.
11. A school employee is not allowed to take/capture pictures/images of students for private purposes. Taking/capturing pictures/images of students for professional purposes is allowed only after obtaining the consent of the student's guardian.
12. A school employee is prohibited from accepting gifts from students and their guardians. Exceptions include small, occasional gifts related to holidays during the school year, such as contributions to a collection, flowers, chocolates, etc.

§ 4.

1. A school employee is strictly prohibited (under the threat of punishment, including imprisonment and loss of employment) from:
 - a. engaging in any sexual or romantic relationships with a student;
 - b. making sexual or pornographic proposals to students, including sharing such content;
 - c. offering students alcohol, tobacco products, and other substances, as well as using them in the presence of children.



§ 5.

1. The employee is obligated to assure students that if they feel uncomfortable, they will receive appropriate assistance (following the instructions for providing it).
2. Homeroom teachers are required to present to students the school's Standards of Protection of Minors, and to assure them that they will receive appropriate assistance if they or those around them are affected by harm and report it to a school employee.
3. In the event that an employee observes a disturbing situation or behaviour, they are required to act according to the instruction manual; it is mandatory in delicate matters such as a suspicion of non-compliance with the Standards, to inform the Head of School (e.g. infatuation of a student with an employee or vice versa). The employee is obliged to react immediately and decisively, while also considering the dignity of the parties involved.

§ 6.

1. Any violent behaviour towards a student is not allowed.
2. Pushing, hitting, poking, etc., are strictly prohibited.
3. A staff member is not allowed to touch a student in such a way that could be misinterpreted.
4. Physical contact with a student should never be secretive or hidden, involve any form of gratification, or result from a power relationship.
5. An employee cannot engage in activities that violate the physical integrity of a student, even in the form of play.
6. An employee who is aware that a student has suffered harm or abuse, including sexual, physical, or neglect, is obligated to exercise special caution in their interactions with the student, by showing understanding and sensitivity to avoid retraumatization.
7. It is unacceptable for an employee to sleep in the same room or bed with a student during school trips or outings.
8. In justified cases, physical contact between an employee and a student is permissible. Such situations may include administering first aid, assisting a disabled student with hygiene, eating meals, moving around the school, if the nature of the disability requires it, and the student and their guardian consent, assisting and correcting while performing exercises in physical education lessons after informing the student in advance and only during group exercises.



§ 7.

1. As a rule, contact with students should only take place during working hours and should relate to educational or pedagogical purposes.
2. Inviting students to an employee's place of residence is not allowed; meetings with a student or their guardian should take place on the school premises. This also includes contacts with children through private communication channels (private phone, email, messengers, social media profiles).
3. If there is a need for contact with a student or their guardian after (outside) the school hours, permissible means of communication are:
 - a. school mail (fem account)
 - b. Managebac,
 - c. Google Classroom.
4. If an employee needs to meet with a student or their guardian after (outside) the school hours, the Head of School must be informed of this fact, and the guardian must consent to such contact.
5. Providing paid tutoring to students of the School is unethical and may be subject to disciplinary responsibility for misconduct against the dignity of the teaching profession or duties.
6. In cases where an employee has family or social relationships with a student or their guardian, the employee is obliged to maintain full confidentiality, especially regarding matters concerning other students, guardians, and employees.

Chapter III.

Identification of and Response to Risk Factors of Student's Abuse.

§ 8.

1. As part of their duties, the School staff have knowledge of and pay attention to risk factors of minor's abuse, in particular the following:
 - a. The student is often dirty, or has an unpleasant odour.
 - b. The student steals food, money, etc.
 - c. The student is often hungry.
 - d. The student does not receive necessary medical care, vaccinations, glasses, etc.
 - e. The student lacks school supplies, clothing and shoes suitable for weather conditions.
 - f. The student has visible physical injuries (bruises, bites, wounds) that are difficult to explain. Injuries are in different stages of healing.



- g. The reasons given by the student regarding the injuries seem unbelievable, impossible, inconsistent, etc., and the student changes them often.
 - h. Reluctance to participate in physical education lessons – the student excessively covers their body, regardless of the situation and weather.
 - i. The student demonstrates fear of a parent or guardian, fear of returning home.
 - j. The student recoils when approached by an adult.
 - k. The student suffers from recurrent somatic ailments: abdominal pain, headaches, nausea, etc.
 - l. The student is passive, withdrawn, submissive, frightened, depressed, etc., or behaves aggressively, rebels, self-harms, etc.
 - m. The student performs academically at a lower level in relation to their capabilities.
 - n. The student escapes into the virtual world (computer games, the Internet).
 - o. The student shows evidence of the use of psychoactive substances.
 - p. Excessive seeking of contact with an adult (so-called "clinginess" of a minor).
 - q. Sexual elements/motifs begin to dominate in the student's artistic works, conversations, and behaviour.
 - r. The student is sexually aroused inappropriately to the situation and age.
 - s. The student runs away from home.
 - t. There has been a sudden and clearly defined change in the student's behaviour.
 - u. The student talks about violence in a way that implies they will commit violence, or have been exposed to violence.
2. If specific behaviours of parents or guardians co-occur with a student's symptoms, a suspicion that the student is being harmed is particularly justified. Disturbing behaviours of parents include:
- a. The parent (guardian) provides unconvincing or contradictory information or refuses to explain the causes of the student's injuries.
 - b. The parent (guardian) refuses, does not maintain contacts with people interested in the student's well-being.
 - c. The parent (guardian) speaks negatively about the minor, constantly blames, humiliates, scolds the student.
 - d. The parent (guardian) subjects the minor to strict discipline or is overprotective or too lenient or rejects the minor.
 - e. The parent (guardian) shows no interest in the well-being (fate) and problems of the minor.



- f. The parent (guardian) often cannot specify the current whereabouts of the minor.
 - g. The parent (guardian) is apathetic, immersed in depression.
 - h. The parent (guardian) behaves aggressively.
 - i. The parent (guardian) has a distorted contact with reality, e.g., reacts inadequately to the situation.
 - j. The parent (guardian) expresses themselves inconsistently.
 - k. The parent (guardian) is unaware of or denies the needs of the minor.
 - l. The parent (guardian) favours one sibling.
 - m. The parent (guardian) crosses permissible boundaries in physical or verbal contact.
 - n. The parent (guardian) demonstrates symptoms of abuse of alcohol, drugs, or other illegal substances.
3. When the risk factors are identified, the School staff engage in a conversation with parents, provide information about available support options and encourage them to seek appropriate help.
 4. The School staff monitor the situation and well-being of the student.

Chapter IV.

Rules and Procedure for Intervention in Cases of Suspected Abuse or Possession of Information about Minor's Abuse.

§ 9.

1. The procedure for intervention in the case of suspected abuse of a student by **third parties** associated with the School, such as school staff, volunteers, organisations, and companies collaborating with the School:
 - a. If a staff member suspects that a student is experiencing **violence resulting in damage to health, sexual exploitation, or there is a threat to their life**, they must ensure the student's safety and separate them from the person posing a threat. The staff member is obligated to notify the police at the emergency numbers 112 or 997.
 - b. In the case of suspicion of **other types of illegal acts**, the staff member must ensure the student's safety, separate them from the person posing a threat, and then – in cooperation with the student's homeroom teacher, the school counselling team, and the Head of School – submits a possible offence notification in writing to the police or a public prosecutor.
 - c. If a staff member suspects that a student has experienced a **one-time incident of physical violence** (e.g., pushing, shoving) **or psychological**



violence (humiliation, discrimination, mockery), they are obliged to ensure the student's safety and separate them from the person causing harm. Subsequently, they must notify the Head of School, who may decide to terminate cooperation with the person causing harm.

- d. If a staff member observes **other concerning behaviours** towards students, (such as shouting, inappropriate comments), they are required to ensure the student's safety and separate them from the person suspected of causing harm. The staff member informs the Head of School so that disciplinary action may be taken, including termination of cooperation if necessary.

A graphic Intervention Plan for Suspected Child Abuse by Third Parties is included as **Appendix no. 3**.

2. The procedure for intervention in the case of suspected abuse of a student by a minor, who has not reached the age of 17:

- a. If a staff member **suspects that a student is experiencing violence resulting in damage to health, sexual exploitation, or there is a threat to their life**, they must ensure the student's safety and separate them from the person posing a threat. Moreover, they inform the school management to conduct an interview or have it conducted by an intervention team. If it is impossible, they conduct an interview with the guardians of the abused student and the guardians of the minor suspected of the offence themselves. At the same time, the staff member – in cooperation with the student's homeroom teacher, the school counselling team, and the Head of School – notifies the nearest family court or the police by submitting a possible offence notification in writing.
- b. If a staff member suspects that a student has experienced **one-time physical or psychological violence, or was a target of other aggressive behaviours** (e.g., inappropriate comments, shouting) from another minor, they are required to ensure the student's safety and separate them from the person causing harm. Moreover, the staff member should notify the school management, conduct separate interviews with the guardians of both the abused student and the abuser (offending student) in the presence of the homeroom teacher and/or the school counselling team, and develop corrective actions. If there is no improvement, the staff member – in cooperation with the student's homeroom teacher, the school counselling team, and the Head of School – should notify the local family court by submitting a request to review the family's situation.



A graphic Intervention Plan for Suspected Child Abuse by a Minor is included as **Appendix no. 4.**

3. The procedure for intervention in the case of suspected abuse of a student by their **parent** or **guardian**:
 - a. If a staff member suspects that a student is experiencing **violence resulting in damage to health, sexual exploitation, or there is a threat to their life**, they must ensure the student's safety and separate them from the person posing a threat. The staff member is obligated to notify the police at the emergency numbers 112 or 997.
 - b. If a staff member suspects that a student has experienced **one-time physical or psychological violence** from a guardian, they are required to ensure the student's safety. Additionally, the staff member notifies the Head of School and conducts an interview with the student's guardians, providing information about the psychological support options. In case of the guardian's non-cooperation or repeated violence, the staff member notifies the relevant social welfare centre and – in cooperation with the student's homeroom teacher, the school counselling team, and the Head of School – submits a request to the family court to review the family's situation.
 - c. If a staff member suspects that a minor is being harmed by **other types of illegal acts**, they inform – in cooperation with the student's homeroom teacher, the school counselling team, and the Head of School – the police or a public prosecutor by submitting a possible offence notification in writing.
 - d. If a staff member suspects that a minor is **neglected** or their guardian is **unfit**, they should ensure the student's safety, notify the school management, and speak with the guardian, suggesting options for psychological and material support. In case of non-cooperative parents, the staff member notifies the relevant social welfare centre.

A graphic Intervention Plan for Suspected Child Abuse by a Parent or Guardian is included as **Appendix no. 5.**

§ 10.

1. When noticing harm to a student, the Intervention Form must be completed in every case. The template is included as **Appendix no. 6.**
2. The form is added to the personal files of the minor.



Chapter V.

Rules of Student's Personal Data and Image Protection.

§ 11.

1. Personal data of minors are subject to protection in accordance with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons concerning the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation - GDPR).
2. The data administrator is the Foundation of International Education with its registered office in Wrocław, at ul. Raławicka 101, 53-149 Wrocław, KRS: 0000041253 ("FEM", "Administrator", "Controller"), also acting as the governing body of International High School in Wrocław.
3. For matters related to the protection of personal data, including any doubts, comments, objections, withdrawal of consent, or the need for explanations, information, or reporting by the Guardian of any other issues related to the protection of personal data, contact FEM at the following addresses: Foundation of International Education, ul. Raławicka 101, 53-149 Wrocław, or via email: rodo@fem.org.pl.
4. Personal data provided by the Guardian during the enrollment process (including personal data of the Child) are processed by the Administrator in accordance with the law, for purposes specified in the Privacy Policy, available at www.fem.org.pl ("Privacy Policy"), including the performance of a contract where the Guardian is or will be a Party or taking actions at the Guardian's request before concluding a contract (Art. 6(1)(b) GDPR); for compliance with a legal obligation imposed on the Controller (Art. 6(1)(c) GDPR); to protect the vital interests of the person whose personal data are concerned (e.g., in regard to nutritional and healthy choice promotion; for purposes arising from the legitimate interests pursued by the Administrator or a third party described in the Privacy Policy (Art. 6(1)(f) GDPR), in particular securing or establishing, investigating, or defending claims, including those related to the concluded contract, archiving documentation related to the bidding process, negotiations, and/or conclusion of the contract; conducting statistics, marketing activities for its own products and services without using electronic communication means or with their use (email addresses and telephone numbers) based solely on consent, handling inquiries submitted using the contact form and requests in any other form.



5. Providing personal data in the application form is necessary to conclude a contract, settle the conducted activity, and fulfil the statutory obligations of the Administrator. Otherwise, providing data is voluntary but necessary to conclude and perform the contract, including the provision of services and obligations arising from the content of the application form and the consent given by the Guardian. Failure to provide personal data also results in the Administrator's inability to fulfil its statutory obligations related to the person whose data it concerns, including those related to educational law and tax law.
6. To the extent that consent to the processing of personal data has been given by the Guardian solely for marketing purposes, providing personal data is voluntary, but the refusal to give consent or its withdrawal will prevent the Administrator from informing about new offers and promotions. Consents given on the basis of Art. 6(1)(a) or Art. 9(2)(a) may be withdrawn at any time without affecting the lawfulness of processing based on consent before its withdrawal.
7. Personal data will not be processed in an automated way (including profiling) in such a way that any decisions would be taken as a result of such automated processing, would have other legal effects, or would significantly affect the data subjects (including potential counterparties) of the Administrator. As part of the activities performed, the Administrator uses cookies in a manner described in detail in the Privacy Policy, including observing and analysing traffic on the Administrator's websites, as well as undertaking remarketing activities. However, as part of these activities, personal data within the meaning of the GDPR are not processed.
8. Subject to the limitations arising from the GDPR and other legal provisions, you have the right to access your data and receive a copy of them; the right to rectify (correct) data; the right to delete data when processing is not necessary for compliance with a legal obligation or the exercise of public authority; the right to limit data processing; the right to data portability; the right to object to data processing; the right to withdraw consent at any time if processing is based on the Guardian's consent; the right to lodge a complaint with the President of the Personal Data Protection Office (address: Urząd Ochrony Danych Osobowych, Ul. Stawki 2, 00 - 193 Warsaw) if, in the Guardian's opinion, the processing of personal data violates the provisions of the EU GDPR.
9. Recipients of personal data are entities described in the Privacy Policy, in particular: entities conducting postal or courier activities, accounting and financial entities, banks, professional advisors, state authorities, and other entities authorised under applicable law to receive personal data, entities cooperating with the Administrator



in activities carried out by the administration, including the performance of administrator's obligations resulting from agreements concluded with the Guardian. As a rule, your personal data are not transferred outside the European Economic Area (EEA), however, their transfer may take place outside the EEA when necessary to fulfil the Administrator's obligations to entities cooperating with the Administrator in activities carried out by the Administrator, including the performance of obligations of the Administrator resulting from agreements concluded with you, e.g., when the provision of the service will require the involvement of entities with registered offices outside the EEA.

10. In the case of lacking specific legal or contractual requirements, the basic period of data retention, in the case of records and other evidentiary documentation drawn up prior to the conclusion of the contract or during the performance of the contract, shall last no longer than the period stipulated by applicable legal regulations or the period necessary to secure information in the event of a legal need to prove facts or to secure, establish, investigate, or defend claims, or the statutory limitation period for civil claims, or the opportunity for effective invocation of the statute of limitations.
11. In the application form, the child's guardian fills in the consent clause for:
 - a. processing by the Foundation of International Education based in Wrocław ("FEM"), at the address: ul. Raclawicka 101, 53-149 Wrocław, KRS: 0000041253 (data controller), the image as well as the name and surname of the Child, of whom they are the legal guardian ("Child"), for the purpose of implementing the educational, upbringing, and care goals of International High School of Wrocław ("School"), as well as for the purpose of preparing school documents, including school identification cards and identifiers;
 - b. processing by the Foundation of International Education based in Wrocław ("FEM"), at the address: ul. Raclawicka 101, 53-149 Wrocław, KRS: 0000041253 (data controller), their image, as well as the image of the Child, of whom they are the legal guardian ("Child"), for the purpose of promoting praiseworthy student attitudes, including achievements in school and extracurricular competitions, outstanding social attitude, as well as for the promotion of the administrator's activities. The consent also includes images captured during school ceremonies, sports and tourist events, competitions, and other forms of the administrator's activities, subject to publication, including placement in the content of the administrator's website and social media (including Facebook and Instagram fan pages), in press materials, and photo galleries in the administrator's facilities.



12. In the application form, the guardian confirms that they have been informed about the voluntary nature of providing data and the consequences of not providing such data, and that they have the right to access their data, correct them, withdraw the consent given at any time, as well as other issues arising from the GDPR, contained in the Privacy Policy (available at: www.fem.org.pl).

Chapter VI.

Rules for Using Electronic Devices with Internet Access. Procedures for Protecting Students from Harmful Content and Threats on the Internet or Through Other Modes.

§ 13.

1. The School provides students with access to the Internet and takes steps to protect students from access to content that may pose a threat to their proper development.
2. Rules for safe use of the Internet and electronic media:
 - a. The school provides staff and students with the opportunity to use the Internet during and outside classes;
 - b. the school network is monitored.
3. A person designated by the Employer is responsible for the security. Said person's duties include, among others:
 - a. securing the school network against dangerous content,
 - b. software installation and update,
 - c. checking at least once a month if there is any dangerous content on computers with free access to the Internet,
 - d. if dangerous content is found, determining who was using the computer at the time said content was introduced,
 - e. providing the Head of School with information about the student who used the computer during said content's introduction.
4. The Head of School arranges an interview between the student and a psychologist or a counsellor about Internet safety.
5. If, as a result of the interview, the psychologist/counsellor receives information that the student is being harmed, they take the actions described in the intervention procedure.
6. In the case of access carried out under the supervision of a School staff member, said staff member is obliged to inform minors about the principles of safe use of the Internet. The School staff member also ensures the safety of students' use of the Internet during classes.



7. At least once a school year, workshops with students on safe use of the Internet are conducted during advisory classes.

Chapter VII.

Principles of Determining and Implementing a Support Plan for Minors After Disclosure of Abuse.

§ 14.

1. Alongside the intervention procedure, the Head of School establishes an intervention team tasked with providing support to the abused student.
2. The team always consists of the homeroom teacher, the school counsellor or the school psychologist, and other staff members with knowledge of child abuse or of the child themselves.
3. The team composition may be expanded to include additional specialists depending on the nature of abuse.
4. The intervention team meets to determine the immediate and future support needed for the student, and creates an individual action plan, which is kept in the student's records.
5. The individual action plan should contain information about:
 - a. Actions taken to ensure the child's safety, including submitting reports of suspected abuse to the appropriate authorities (if necessary).
 - b. Support offered to the child by the institution.
 - c. Child's referrals to specialised help centres if needed.
 - d. The Intervention Card included in Appendix no. 3.
6. The counsellor or psychologist requests a meeting with the abused child's guardians. A meeting report should be created.
7. The individual action plan for helping the child is presented to the guardians by the counsellor or psychologist with a recommendation for cooperation in its implementation. The counsellor or psychologist informs the guardians of the school's obligation to report the suspected abuse to the relevant authority if necessary.
8. The further course of action is within the remit of the institution that was informed about the child's abuse.



Chapter VIII.

Principles and Procedures for Initiating the "Blue Card" Procedure.

§ 15.

1. The main goal of the "Blue Card" is to streamline the assistance provided by the School and create conditions for a systematic, interdisciplinary model of working with the family.
2. If any School staff member receives a report from a student claiming to be a victim of violence, said staff member is obliged to initiate the "Blue Card" procedure. Every piece of information about the occurrence of domestic violence requires immediate action.
3. The "Blue Card" initiation procedure is applied in situations where intervention is taken due to suspected harm to a student, as described in Chapter 3.
4. The procedure for initiating the "Blue Card" is attached as **Appendix no. 7** to these Standards.

Chapter IX.

Principles of Updating and Monitoring the Standards of Protection of Minors and the Scope of Competencies of Persons Responsible for Training the School Staff in Applying the Standards.

§ 16.

1. The procedure for updating the Standards takes place no less than once every 2 years.
2. The Head of School appoints a person responsible for the Standards of Protection of Minors.
3. The person designated by the Head of School monitors the implementation of the Standards, responds to rule violations, and coordinates changes to the Standards, managing a record of incident reports and proposed amendments.
4. The person responsible for the implementation of the Standards is required to conduct surveys among the school staff at least once a year; the survey template is attached as **Appendix no. 8** to these Standards. The survey can also be conducted online.
5. After the survey, the person responsible compiles the completed surveys and prepares a report, which is presented to the Head of School
6. In the survey, the school staff can propose changes to the Standards and indicate violations of the Standards at School.



7. While monitoring the Standards, the Head of School may appoint a person to conduct a survey among students regarding their awareness of available support at School. The survey template is attached as **Appendix no. 9** to these Standards. The survey can also be conducted online.
8. The person responsible for the implementation of the Standards may establish a coordinating team if it is believed that such a team will contribute to a better implementation of the Standards or allow for a faster response in a situation where the Standards of Protection of Minors require updating.
9. If necessary, the person responsible proposes changes to the existing Standard and submits them to the Head of School for approval.
10. The Head of School introduces necessary changes to the Standards and announces them to the school staff.

Chapter X.

Principles of Providing Parents and Students Access to the Standards.

§ 17.

1. The document "The Standards of Protection of Minors" is a document publicly accessible to the school staff, students, and their guardians.
2. The document is published on the School's website.
3. The document is discussed at the first meeting with guardians in a given school year (unless changes were made, then it is also discussed at the first meeting held after the introduction of changes).
4. The homeroom teacher provides the guardian with a statement form to sign, confirming that they have read and understood the Standards. The statement is attached as **Appendix no. 2** to these Standards.
5. Homeroom teachers are required to inform the students about the Standards and discuss them in a manner appropriate to their age.

Chapter XI.

Final Provisions.

1. The Standards for the Protection of Minors come into effect on the day of their announcement.
2. The announcement is made in a manner accessible to the school staff, students, and their guardians, especially by posting in a designated location for staff or by electronic transmission, and by posting on the school's website. Parents of students are also informed through the electronic journal.



Appendix no. 1.

**Statement regarding Lack of Criminal Record and/or Pending Preparatory,
Judicial, and Disciplinary Proceedings.**

.....

city, data

I..... PESEL state that
I have not been convicted of any crimes against sexual freedom and morality, or crimes
involving violence against minors, and that no criminal or disciplinary proceedings are
pending against me in this regard.

.....

signature



Appendix no. 2.

**Acknowledgement of and Adherence to the Standards of Child Protection
at International High School of Wrocław**

.....

city, data

I..... PESEL state that
I have reviewed the Standards for the Protection of Minors applied at International High
School of Wrocław, and I declare that I will adhere to them.

.....

signature



Appendix no. 3.

Graphic Intervention Plan for Suspected Child Abuse by Third Parties.

You suspect that a child:	
experiences violence resulting in damage to health¹, experiences sexual abuse and/or their life is at risk	is harmed by other types of illegal acts
<ul style="list-style-type: none"> • separate the child from the person you suspect of harming them; • inform the police using numbers 112, 997². 	<ul style="list-style-type: none"> • separate the child from the person you suspect of harming them; • inform the police or a public prosecutor in writing by submitting a possible offence notification³.
experiences one-time other physical violence (e.g. slapping, pushing, poking) or psychological violence (e.g. humiliation, discrimination, ridicule):	experiences other concerning behaviours (i.e. shouting, unacceptable comments)
<ul style="list-style-type: none"> • separate the child from the person you suspect of harming them; • end cooperation with a person harming the child. 	<ul style="list-style-type: none"> • separate the child from the person you suspect of harming them; • conduct the disciplinary meeting, and in case of lack of improvement, end cooperation.

¹ Violence resulting in damage to health means causing illness or injury (e.g. fracture, bruising, knocking out a tooth, wounding), as well as, among other things, deprivation of sight, hearing, speech, causing other severe disability, permanent mental illness, disfigurement of the body, etc.

² In your conversation with the consultant, provide your personal information, the child's information, the suspected abuser's information, and any facts known to you about the case.

³ You can address the notification to the office closest to you. In the notification, provide your personal data, the child's data and the data of the suspected abuser, as well as any facts known to you about the case - describe what exactly happened and who may have knowledge of it. You can also submit the notification anonymously, but your providing details will enable the authorities to obtain the necessary information more quickly. The notification should be submitted in cooperation with the homeroom teacher, the counselling team, and the Head of School.



Appendix no. 4.

**Graphic Intervention Plan for Suspected Child Abuse by a Minor
who is not yet 17 years old**

You suspect that a child:	
experiences violence resulting in damage to health¹, experiences sexual abuse and/or his life is at risk	experiences one-time other physical violence (e.g. slapping, pushing, poking), psychological violence (e.g. humiliation, discrimination, ridicule) or experiences other concerning behaviours (ie. shouting, unacceptable comments)
<ul style="list-style-type: none"> separate the child from the person you suspect of harming them; interview the parents/guardians of the abused and the abusive child; notify the nearest family court or the police in writing by submitting a possible offence notification². 	<ul style="list-style-type: none"> separate the child from the person you suspect of harming them; interview the parents/guardians of the abused and the abusive child separately, and develop corrective actions; in case of repeated abusive behaviour, notify the local family court by submitting a request to review the family's situation³.

¹ Violence resulting in damage to health means causing illness or injury (e.g. fracture, bruising, knocking out a tooth, wounding), as well as, among other things, deprivation of sight, hearing, speech, causing other severe disability, permanent mental illness, disfigurement of the body, etc.

² You can address the notification to the office closest to you. In the notification, provide your personal data, the child's data and the data of the suspected abuser, as well as any facts known to you about the case - describe what exactly happened and who may have knowledge of it. You can also submit the notification anonymously, but your providing details will enable the authorities to obtain the necessary information more quickly. The notification should be submitted in cooperation with the homeroom teacher, the counselling team, and the Head of School.

³ Submit the request in writing to the family court with jurisdiction over the child's place of residence. In the request, provide all the data known to you about the child (first and last name, home address, parents' names) and all the circumstances that may be relevant to the resolution of the case (describe what is worrying in the family, what you have observed). The request should be submitted in cooperation with the homeroom teacher, the counselling team, and the Head of School.



Appendix no. 5.

Graphic Intervention Plan for Suspected Child Abuse by a Parent or Guardian.

You suspect that a child:	
experiences violence resulting in damage to health¹, experiences sexual abuse and/or his life is at risk	is harmed by other types of illegal acts
<ul style="list-style-type: none"> • separate the child from the parent/guardian you suspect of harming them; • inform the police using numbers 112, 997². 	<ul style="list-style-type: none"> • inform the police or a public prosecutor in writing by submitting a possible offence notification³.
experiences neglect or the child's parent/guardian is unfit (e.g. the child wears clothes inappropriate to the season and/or weather, remains unattended for long periods of time)	experiences one-time other physical violence (e.g. slapping, pushing, poking), psychological violence (e.g. humiliation, discrimination, ridicule) or experiences other concerning behaviours (ie. shouting, unacceptable comments)
<ul style="list-style-type: none"> • ensure the child's safety; • speak with the parent/guardian; • inform them about available psychological/material support; • in case of lack of cooperation with parent/guardian, inform the relevant social welfare centre. 	<ul style="list-style-type: none"> • ensure the child's safety; • speak with the parent/guardian suspected of causing harm; • inform them about available psychological support; • in case of lack of cooperation with parent/guardian or repeated instances of violence, inform the relevant social welfare centre⁴. • concurrently, notify the local family court by submitting a request to review the family's situation⁵.

¹ Violence resulting in damage to health means causing illness or injury (e.g. fracture, bruising, knocking out a tooth, wounding), as well as, among other things, deprivation of sight, hearing, speech, causing other severe disability, permanent mental illness, disfigurement of the body, etc.

² In your conversation with the consultant, provide your personal information, the child's information, the suspected abuser's information, and any facts known to you about the case.

³ You can address the notification to the office closest to you. In the notification, provide your personal data, the child's data and the data of the suspected abuser, as well as any facts known to you about the case - describe what exactly happened and who may have knowledge of it. You can also submit the notification anonymously, but your providing details will enable the authorities



to obtain the necessary information more quickly. The notification should be submitted in cooperation with the homeroom teacher, the counselling team, and the Head of School.

⁴ Notify the centre in writing or by email. Remember to provide all the data known to you about the child (first and last name, home address, parents' names), describe all worrying circumstances occurring in the family and all facts known to you. The notification should be submitted in cooperation with the homeroom teacher, the counselling team, and the Head of School.

⁵ Submit the request in writing to the family court with jurisdiction over the child's place of residence. In the request, provide all the data known to you about the child (first and last name, home address, parents' names) and all the circumstances that may be relevant to the resolution of the case (describe what is worrying in the family, what you have observed). The request should be submitted in cooperation with the homeroom teacher, the counselling team, and the Head of School.



Appendix no. 6.

Intervention Form

1. Imię i nazwisko dziecka/Child's name and last name		
2. Przyczyna interwencji (forma krzywdzenia)/Reason for intervention (the form of abuse)		
3. Osoba zawiadamiająca o podejrzeniu krzywdzenia/Person informing about potential abuse		
4. Opis działań podjętych przez pedagoga/psychologa/Actions undertaken by the school counsellor/psychologist	Data/date	Działanie/action
5. Spotkania z opiekunami dziecka/Meetings with child's guardians	Data/date	Opis spotkania/Meeting description
6. Forma podjętej interwencji (zakreślić właściwe)/Type of intervention(circle the correct one		
<ul style="list-style-type: none"> • zawiadomienie o podejrzeniu popełnienia przestępstwa/possible offence notification, • wniosek o wgląd w sytuację dziecka/rodziny/request to review the child's/family's situation, • inny rodzaj interwencji. Jaki?/Other type of intervention. What kind? 		
7. Dane dotyczące interwencji (nazwa organu, do którego zgłoszono interwencję) i data interwencji/Intervention information (name of authority notified & date of intervention)		
8. Wyniki interwencji: działania organów wymiaru sprawiedliwości, jeśli placówka uzyskała informacje o wynikach/ działania placówki/działania rodziców/Intervention results: legal authorities' actions, if the school obtained information on the outcomes /school's actions /parents' actions	Data/date	Działanie/action



Appendix no. 7.

"Blue Card" - Procedures, Implementation.

The "Blue Cards" procedure - counteracting domestic violence.

1. Domestic violence is a single or repeated intentional act or omission violating the rights or personal welfare of family members, as well as other persons living or managing a household together, in particular exposing these persons to the risk of loss of life or health, violating their dignity, bodily integrity, freedom, including sexual abuse, causing damage to their physical or mental health, as well as causing suffering and moral harm to persons affected by violence.
2. The provisions of the Regulation of the Council of Ministers of September 6, 2023 on the "Blue Cards" procedure and "Blue Card" form templates (Journal of Laws of 2023, item 1870) apply from September 28, 2023.
3. Types of domestic violence:
 - a. physical violence;
 - b. emotional abuse;
 - c. neglect;
 - d. sexual abuse;
 - e. minor witnessing violence.
4. The "Blue Cards" procedure imposes specific tasks on the school in the event of a justified suspicion of domestic violence against a student, if, for example, the student:
 - a. bears traces of physical violence - traces of blows, burns, bruises, wounds, frequent swellings, fractures, dislocations, etc.
 - b. shows signs of psychological violence such as bedwetting, excessive sweating, pain, speech disorders related to nervous tension, shows difficulties in establishing contact, avoids conversations, has low self-esteem, depression, destructive behaviour or is withdrawn, tearful, fearful, aggressive, apathetic, distrustful, intimidated, dependent on others, etc.
 - c. their clothes are dirty, inappropriate for the season, their development, height and weight are inappropriate for their age. They do not seek medical help despite chronic illness, etc.
5. Recognizing domestic violence and completing the "Blue Card" is the beginning of the process of supporting a victim of violence.
6. Intervention against a family affected by violence based on the "Blue Cards" procedure does not require the consent of the student affected by violence.



7. The procedure is initiated at school by completing the "Blue Card - A" form in the presence of a student suspected of being affected by domestic violence. By initiating the procedure, intervention measures are taken to ensure the safety of such a student. If the student does not wish to participate in the indicated procedure or if they are against it, the form can be completed without their presence.

Implementing the "Blue Cards" procedure

1. The "Blue Card" is established by the school staff member who has received an information about potential abuse to a student or a member of the student's family (the decision to create a "Blue Card" should be made after consultations and in cooperation with the homeroom teacher, the counselling team and the Head of School).
2. The procedure is initiated by completing the "Blue Card - A" form in the presence of the person suspected of being affected by domestic violence.
3. In the event of suspicion of domestic violence against an underage student, activities undertaken and implemented as part of the procedure are carried out in the presence of the parent, legal or actual guardian. If the above-mentioned persons refuse to cooperate, action is taken without their presence.
4. If the persons suspected of using domestic violence against a minor are parents, legal or actual guardians, activities involving the student are carried out in the presence of the closest adult person.
5. Activities involving a student suspected of being affected by domestic violence must be conducted in the presence of a school counsellor or psychologist.
6. After completing the "Blue Card - A" form, the "Blue Card - B" form is provided to the person suspected of being affected by domestic violence.
7. If domestic violence concerns an underage student, the "Blue Card - B" form is submitted to the parent, legal or actual guardian or to the person who reported suspicion of domestic violence (the "Blue Card - B" form is not provided to the person suspected of using domestic violence).
8. The completed "Blue Card - A" form is submitted to the interdisciplinary team immediately, but no later than within 5 business days from the date of initiation of the procedure.
9. The "Blue Card - A" and "Blue Card - B" forms are appendices to the Regulation of the Council of Ministers of September 6, 2023 on the "Blue Card" procedure and "Blue Card" form templates.



Appendix no. 8.

Standards Monitoring - Survey for Employees.

	Please answer the following questions	Yes	No
1.	Do you know the standards of student protection applied in our School?		
2.	Can you recognize the symptoms of an abused child?		
3.	Do you know how to respond if you notice the symptoms of child's abuse?		
4.	Have you observed any violation of the principles set out in the Standards and other regulations and procedures by another employee?		
5.	Do you have any comments /suggestions/ thoughts related to the Standards of Protection of Minors functioning at the School? (If yes, describe them in the table below)		
6.	Is any activity related to the application of the Standards perceived as difficult or are you reluctant to implement it for other reasons?		



If you answered **YES** to any of the above questions, please fill in:

What procedure(s) have been violated?

What actions have you undertaken?

Do you have any suggestions on how to implement the standards more efficiently?



Appendix no. 9.

Standards Monitoring - Survey for Students.

Please answer the following questions	Yes	No
Do you know the standards of student protection applied in our School?		
Do you know who you can ask for help if you're abused?		
Did you find someone who helped you and provided assistance?		
Have you ever witnessed any aggression/violence being used against someone else? (If yes, describe below the table how you reacted/reacted.)		
Have you ever witnessed aggression in your class?		