CHILD AND ADOLESCENT SAFEGUARDING STANDARDS

STANDARDS FOR THE PROTECTION OF MINORS AT HORYZONT PSYCHOTERAPIA

Version No. 1

Effective from: 1 January 2026

Preamble

These Standards for the Protection of Minors (hereinafter the “Standards”) set out the rules for ensuring the safety of children and adolescents receiving consultations, assessments, psychological support, psychotherapy or other forms of assistance provided by Horyzont Psychoterapia (hereinafter the “Centre”).

The purpose of the Standards is to:

1. prevent harm to minors;

2. establish rules governing safe relationships between minors and staff;

3. establish procedures for responding to suspected harm to a minor;

4. establish rules for documenting incidents and providing support;

5. ensure that the rules applicable at the Centre are transparent to staff, parents, guardians and minors.

Chapter 1. General Provisions

§ 1. Legal Basis and Scope of Application

1. These Standards are introduced in fulfilment of obligations arising from the Act of 13 May 2016 on Counteracting Threats of Sexual Crime and the Protection of Minors.

2. These Standards apply to all persons employed by, cooperating with or performing activities on behalf of the Centre if, in connection with their role, they have contact with minors or access to information concerning minors.

3. These Standards apply, as appropriate, to in-person, telephone and remote interactions, including those conducted by electronic means of communication.

§ 2. Definitions

For the purposes of these Standards:

1. “minor” means a person under 18 years of age;

2. “Centre” means Horyzont Psychoterapia;

3. “Centre Manager” means the owner, the person managing the Centre or a person designated by them in writing;

4. “staff” means all persons employed by or cooperating with the Centre, regardless of the legal basis of their engagement, including psychologists, psychotherapists, assessment specialists, reception staff, trainees, interns and volunteers;

5. “parent or guardian” means a minor’s legal representative or de facto guardian, where the law permits the latter to participate in a given activity;

6. “harm to a minor” means any act or omission, whether isolated or repeated, that infringes a minor’s rights, personal interests, safety, health, development or dignity, including physical, psychological or sexual violence, neglect and abuse through electronic means of communication;

7. “person responsible for the Standards” means the person designated by the Centre’s owner to receive reports, support staff in applying the Standards, maintain the incident register and coordinate the activities provided for in the Standards;

8. “intervention” means action taken where harm to a minor is suspected or information about such harm has been received;

9. “incident threatening a minor’s welfare” means suspected harm, a breach of the Standards or any other situation that may compromise a minor’s safety.

§ 3. General Principles

1. The overriding principle of all actions taken by staff is the best interests of the minor and respect for their dignity, autonomy, privacy and right to be heard.

2. Staff act with due regard to the minor’s age, emotional state, developmental needs, family circumstances and any disability or communication difficulties.

3. Every staff member is required to know and comply with the Standards.

4. The Centre Manager is responsible for implementing and updating the Standards and organising staff training.

5. The person responsible for implementing the Standards is Katarzyna Wieczorek-Borek, Centre Manager; telephone: 604 930 837; email: centrum@psychoterapiahoryzont.pl.

§ 4. Screening Persons Permitted to Work with Minors

1. Before allowing a person to undertake work or cooperation involving contact with minors, the Centre Manager screens that person in accordance with applicable law.

2. Screening includes, in particular:

1) obtaining information from the Register of Sexual Offenders;

2) obtaining current information from the National Criminal Register to the extent required by law;

3) in the case of persons who have held citizenship of another country or resided abroad, obtaining the documents or declarations required by law.

3. Documents confirming screening are added to the personnel records or records relating to the person cooperating with the Centre.

4. If information is received that a staff member:

1) is subject to proceedings concerning acts that may endanger the safety of minors; or

2) has been convicted by a final judgment of an offence that disqualifies them from working with minors,

the Centre Manager immediately removes that person from contact with minors and takes further action as required by law.

5. Every staff member must immediately inform the Centre Manager of any circumstance that may affect their continued eligibility to work with minors.

Chapter 2. Rules for Ensuring Safe Relationships Between Minors and Staff

§ 5. Basic Principles

1. Staff:

1) treat minors with respect, calmness and patience;

2) communicate with minors in language appropriate to their age and level of understanding;

3) allow minors to ask questions, express emotions and present their own views;

4) respect a minor’s right to have a parent or guardian present where consistent with the nature of the work and applicable law;

5) respect minors’ physical and psychological boundaries.

2. Staff undertake only those actions involving a minor that are justified by the purpose of the consultation, assessment or therapy, the minor’s safety or a legal obligation.

3. Wherever possible, each action involving a minor should be explained in advance to the minor and their parent or guardian.

4. Professionalism and appropriate professional boundaries must be maintained in all interactions with minors.

§ 6. Contact with Minors

1. As a rule, contact between staff and minors takes place within the Centre’s activities, at the service delivery location or through an agreed and secure remote channel.

2. Contact outside the agreed scope of services, particularly contact of a private nature, is prohibited.

3. As a rule, organisational communications concerning a minor are conducted with their parent or guardian, unless applicable law or the minor’s best interests justify another approach.

4. Where the nature of the work requires direct contact with a minor over the age of 16, such contact must be transparent, appropriate to its purpose and capable of being reconstructed from the Centre’s records or organisational system.

§ 7. Special Care

1. Staff exercise particular attentiveness, tact and sensitivity towards minors displaying signs of anxiety, distress, trauma, disability, communication difficulties or previous experiences of violence.

2. If a minor discloses an experience of violence or indicates a threat, staff:

1) remain calm;

2) do not challenge the minor’s account;

3) do not promise absolute confidentiality if an intervention may be required;

4) explain, in an age-appropriate manner, what further action may be taken.

Chapter 3. Prohibited Conduct

§ 8. Conduct Prohibited Towards Minors

The following are prohibited in particular:

1. using physical, psychological or sexual violence against a minor;

2. shouting at, shaming, mocking, humiliating, insulting, intimidating, blackmailing or labelling a minor;

3. violating a minor’s bodily boundaries without justification arising from the purpose of the work or safety considerations;

4. initiating or maintaining an erotic, sexual, romantic or pseudo-intimate relationship;

5. making sexual propositions, comments or jokes to a minor;

6. contacting a minor privately outside the Centre’s activities;

7. inviting minors to engage in private contact through social media, messaging applications or online games;

8. providing minors with age-inappropriate content, including erotic, pornographic, violent or degrading material;

9. recording a minor’s image, voice or other data on a private device or account;

10. asking a minor to keep secrets from their parent, guardian or the Centre about matters that may affect their safety;

11. being alone with a minor without justification arising from the nature of the activity and the organisation of work;

12. accepting gifts from a minor or offering them private benefits where this could breach professional boundaries.

Chapter 4. Intervention Rules and Procedures and Responsible Persons

§ 9. Duty to Respond

1. Every staff member who:

1) suspects that a minor is being harmed;

2) receives information that a minor is being harmed; or

3) identifies a breach of the Standards,

must respond immediately and report the matter in accordance with this chapter.

2. Failure to respond to credible information about a threat to a minor’s welfare constitutes a breach of employment duties or the terms of cooperation.

§ 10. Receiving Reports

1. Reports may be made verbally, in writing, by email or by another method accepted at the Centre, to:

1) the Centre Manager.

§ 11. Actions Immediately Following a Report

1. The person receiving the report:

1) ensures the minor’s safety;

2) determines whether there is a threat to life or health requiring immediate action;

3) prepares a note or intervention record.

2. Where there is an immediate threat to life or health, the relevant emergency services must be contacted without delay, in particular by calling 112.

3. Where there is suspicion that a crime has been committed against a minor, action required by law is taken, including notifying the competent authorities.

4. Where domestic violence is suspected, measures appropriate to the situation are taken, including the “Blue Cards” procedure if the Centre is authorised to initiate it.

§ 12. Notifications and Responsibility

1. The Centre Manager or a person designated by the Manager is responsible for coordinating interventions.

2. The Centre Manager or a person authorised in writing is responsible for preparing and submitting notifications to the Police, the public prosecutor’s office, the guardianship court or other competent institutions.

3. Every staff member must provide the person handling the case with all necessary information and cooperate in documenting the incident.

4. If a staff member is the subject of the suspicion, they are immediately removed from contact with minors until the matter has been clarified.

§ 13. Documenting Incidents

1. Each report and the actions taken are documented through:

1) an intervention record;

2) an official note;

3) copies of notifications sent to external institutions;

4) an entry in the incident register.

2. The register of incidents threatening minors’ welfare is maintained by the person responsible for the Standards.

3. Records are stored in a manner ensuring confidentiality, integrity and access exclusively by authorised persons.

Chapter 5. Review, Updating and Staff Training

§ 14. Review and Updating

1. The Standards are reviewed at least once every two years.

2. Irrespective of paragraph 1, the Standards are updated whenever:

1) legislation changes;

2) the Centre’s work organisation changes;

3) a need to clarify procedures becomes apparent.

3. The conclusions of each review are documented in writing.

§ 15. Staff Training and Preparation

1. Every person beginning employment or cooperation with the Centre must familiarise themselves with the Standards before being permitted contact with minors.

2. Familiarisation with the Standards is confirmed by signature or in documentary form.

3. The Centre Manager provides staff with training or instruction covering at least:

1) rules for safe relationships with minors;

2) recognising signs of abuse or harm;

3) reporting procedures;

4) incident documentation requirements;

5) confidentiality and data protection rules.

4. Katarzyna Wieczorek-Borek, Centre Manager, is responsible for preparing staff to apply the Standards.

Chapter 6. Making the Standards Available

§ 16. Access to the Standards

1. The Standards are made available:

1) on the Centre’s website at https://psychoterapiahoryzont.pl/;

2) in a visible location at the Centre’s premises;

3) at reception or another patient service point.

2. The Centre makes available:

1) the full version of the Standards;

2) an abridged version intended for minors.

3. The abridged version should use simple, understandable language appropriate to the readers’ age.

4. At the request of a parent, guardian or minor, staff provide information about where the Standards may be consulted.

Chapter 7. Rules for Using Electronic Devices and the Internet and Protection Against Harmful Content

§ 17. General Principles

1. The Centre does not provide minors with electronic devices with Internet access for independent use unless this is necessary for a specific form of work carried out under staff supervision.

2. If the Centre provides Internet access to guests or patients, it should be used in accordance with the Centre’s organisational security rules.

3. The Centre’s work devices and IT systems are used exclusively for professional and organisational purposes.

§ 18. Rules for Staff

1. Staff use only tools, accounts and communication channels approved by the Centre for matters concerning minors.

2. The following are prohibited:

1) using private accounts, messaging applications, telephone numbers or social media profiles for communication concerning minors, unless the Centre Manager has exceptionally permitted this arrangement subject to appropriate security safeguards;

2) leaving unattended a logged-in computer, telephone, documents or an open system containing minors’ data;

3) copying minors’ data to private storage media or transmitting them through unauthorised channels;

4) searching for, playing or sharing, in the presence of minors, content inappropriate to their age or the purpose of the meeting.

3. Electronic contact with a minor must be limited to situations justified by the nature of the work, compliant with the law, transparent and verifiable.

§ 19. Remote Services

1. Consultations, sessions and other forms of remote work are conducted using tools providing the highest practicable level of security and confidentiality.

2. Before a remote meeting begins, staff explain basic safety rules, including the need for participants to ensure as private an environment for the conversation as possible.

3. As a rule, recording meetings with minors by staff or participants is prohibited unless:

1) a legal provision requires or permits recording; or

2) a separate, explicit legal basis exists and all formal requirements have been met.

4. If staff find that a minor is exposed to harmful content during remote contact or is in circumstances threatening their welfare, they take measures appropriate to the situation, including interventions provided for in the Standards.

§ 20. Protection Against Harmful Content

1. Staff do not make available to minors content that may threaten their development, safety or well-being, particularly violent, sexual or degrading content, or content encouraging self-directed aggression, self-harm, the use of psychoactive substances or risky behaviour.

2. If staff learn that a minor has been exposed to harmful content, they discuss the matter in a manner appropriate to the circumstances and, depending on the situation, inform the parent or guardian and consider whether further intervention is necessary.

3. If devices accessible to minors are used at the Centre, they must be secured in a manner appropriate to the risk, particularly through settings restricting access to inappropriate content.

Chapter 8. Rules for Establishing a Support Plan for a Minor Following Disclosure of Harm

§ 21. Support Plan

1. Following disclosure of harm to a minor, the Centre Manager establishes a support plan appropriate to the minor’s circumstances.

2. The support plan is developed taking into account:

1) the minor’s safety;

2) their psychological condition and needs;

3) the scope of necessary protective measures;

4) the role of the parent or guardian, provided that they are not responsible for the harm;

5) the need to contact appropriate support or child protection institutions.

3. Wherever possible, the minor’s views are heard and taken into account when planning support.

4. The support plan may include, in particular:

1) ensuring safe conditions during the minor’s presence at the Centre;

2) designating a contact person for the minor;

3) providing information on available forms of assistance;

4) cooperating with the parent or guardian, provided this does not endanger the minor’s welfare;

5) taking legal or organisational measures provided for in the Standards.

5. The support plan is documented in the intervention records.

Chapter 9. Rules for Protecting Minors’ Images

§ 22. Protection of Images

1. A minor’s image is protected.

2. Recording or disseminating a minor’s image requires a legal basis and any consent required by law, unless a specific legal provision states otherwise.

3. Staff may not use a minor’s image for private or promotional purposes without meeting the legal and organisational requirements applicable at the Centre.

4. If video surveillance is used at the Centre, its operation is governed by separate internal regulations and information obligations relating to personal data processing.

5. Images recorded through surveillance may not be used for any purpose other than that for which they were collected, unless otherwise provided by law.

Chapter 10. Final Provisions

§ 23. Entry into Force and Application

1. The Standards enter into force on 1 January 2026.

2. The Standards are binding on all Centre staff.

3. Breach of the Standards may result in disciplinary, contractual, employment-related or other liability provided for by law.

4. The annexes available at the Centre’s premises or from the person designated to provide access to them form an integral part of the Standards, in particular:

1) Intervention Record;

2) Register of Incidents Threatening a Minor’s Welfare;

3) Declaration of Familiarisation with the Standards;

4) Abridged Version of the Standards for Minors;

5) Standards Evaluation Questionnaire or Form.