



IRC Poland Country Program: Child Protection Standards

Child Protection Standards (Child Protection Policy)

Policy Owner:	International Rescue Committee (IRC) Poland. This policy is also complementary to other IRC policies: <i>Safeguarding Policy, Global Reporting Guidelines</i>	
Approved by:	Country Director	Dariusz Ziętek

1. Introduction

IRC works to help people whose lives and livelihoods have been shattered by conflict and disaster –including the climate crisis – to survive, recover, and gain control over their future. Harm perpetuated by IRC Persons or those associated with us hurts people, undermines our mission and programming, erodes trust in the communities where we work, and can have serious safety, security, and reputational risk to us as an organization.

This policy affirms **IRC's responsibility to ensure that every child** we encounter, regardless of age, gender identity, socioeconomic status, ability, sexual orientation, or ethnic and migration background, **is always protected from all forms of harm.**

IRC is committed to safeguarding children in all its activities by consistently applying three core pillars:

- (1) **Preventing harm:** through safe practices, training, and proactive measures in all programs.
- (2) **Reporting concerns:** ensuring staff know how to report suspected or observed harm promptly.
- (3) **Responding effectively:** taking timely and appropriate action whenever harm occurs or is suspected.

This policy also:

- a. Defines key concepts and types of harm, including online risks, abuse, neglect, exploitation, and exposure to violence
- b. Clarifies safe interactions between staff and children, and between children themselves
- c. Connects to relevant local laws, guidance, and support services
- d. Outlines staff responsibilities, reporting procedures, and required training
- e. Establishes how the policy will be maintained, reviewed, and updated regularly

The procedure is implemented in response to the obligations introduced by the Republic of Poland's national legislation. Specifically, it aligns with the Act on Preventing Threat of Sexual Crime and Protection of Minors (2016), and all other relevant Polish law regulations, including, on children rights.

The procedure is also anchored in international standards on protection of children rights, among them the Convention on the Rights of the Child, the Universal Declaration of Human Rights, and

IRC's internal ethical policies, among them, the IRC Way Code of Conduct, the Child Safeguarding Policy, and other interconnected policies

2. Key definitions

- **Child Protection Standards (Child Protection Policy):** The policy of the International Rescue Committee (IRC) Poland that sets out the principles, standards, and procedures to protect children from harm.
- **Child Protection Intervention Focal Point (CP Intervention Focal Point / CP Focal Point):** A designated IRC staff member trained in child protection and safeguarding. They receive reports of harm or suspected harm, provide guidance and support to staff, volunteers, and associated persons, and coordinate the appropriate response to ensure the child's safety and well-being. CP Focal Points are part of IRC's Child Protection and Safeguarding departments of IRC Poland.
- **Child:** Any person below the age of eighteen years, as defined in the Convention on the Rights of the Child.
- **Adult:** Any person aged 18 years or older.
- **Caregiver / guardian:** Any individual with legal or de facto responsibility for a child, including parents, guardians, or other trusted adults responsible for the child's well-being.
- **IRC persons:** All employees, volunteers, contractors, consultants, interns, or others working for or on behalf of IRC Poland.
- **Associated persons:** Any individual who works with, or interacts with, IRC programs, services, or participants, including partners, contractors, or visitors.
- **IRC activities:** Any programs, services, or events organized, funded, or implemented by IRC Poland that involve children or community members.
- **Personal data of a child:** Any information that relates to a child who is identified or can be identified. An identifiable child is a person under the age of 18 who can be recognised either directly or indirectly, for example through details such as their name, identification number, location data, online identifier, or other characteristics linked to their physical, biological, psychological, economic, cultural or social identity.
- **Consent:** Consent is the voluntary agreement of an individual who has the legal capacity to give consent to participate in an activity on their behalf or on that of any individual dependent on them, in the case of de jure or de facto caregivers. Consent is reversible at any time and requires access to and understanding of all relevant information, for instance on risks and potential negative consequences of the aforementioned activity.
- **Assent:** While "informed consent" is the voluntary agreement of an individual who has the legal capacity to give consent to service delivery, "informed assent" is the expressed willingness to participate for those not holding such legal capacity. For example, we seek the informed assent of younger children who are by definition too young to give informed consent, but who are old enough to understand and agree to participate in services. Informed assent does not remove the need for receiving informed consent from a caregiver or other trusted non-offending adult. It is worth noting that informed assent or consent is not necessary when in front of a case of mandatory reporting.
- **Intersectionality:** This means understanding that a child's experience is shaped by many different factors at the same time, like their gender, disability, ethnicity, or economic background. These overlapping factors can make them more vulnerable or affect their needs.
- **Best Interests of a Child:** This means that whenever decisions are made that affect a child, the most important thing is what is safest and healthiest for them. Their safety, well-being, and overall development come first, above all other considerations.

- **Unaccompanied child:** a child who is separated from both parents or legal guardians and is not being cared for by an adult responsible for their legal custody. This includes children who arrive alone, are left without adult supervision, or are temporarily separated from their family in situations where no adult caregiver is legally responsible for them.

3. Purpose of the document

The purpose of this policy is **to protect all children participating in IRC's activities from any harm they may experience**, including harm resulting from:

- the conduct of IRC staff or collaborators;
- the conduct of individuals taking part in IRC activities as clients;
- the design and implementation of the IRC's programs and activities.

This procedure is complementary and consistent with [IRC's organizational policies](#), and local [Safeguarding SOP](#).

4. Child protection - definition

Child protection means all measures taken to prevent and respond to any harm caused to children.

- **Harm:** Any action or inaction that causes, or could cause, physical, emotional, psychological, or developmental damage to a child.
- **Abuse:** Any action or failure to act in which a child is harmed, or could be harmed, by someone who uses their power, influence, or authority. This includes, but is not limited to, physical, emotional, psychological, or sexual harm and neglect. Abuse usually occurs in situations with an imbalance of power, trust, or vulnerability, and may involve pressure or coercion.
 - a. Physical abuse:** Using physical force that causes, or could cause, actual or likely injury or suffering to a child. Examples include grabbing, hitting, kicking, biting, shaking, pushing, or burning.
 - b. Sexual abuse:** Any form of attempted or actual sexual activity that is unwanted, forced, or takes place within a context of significant power imbalance. This includes, for example:
 - Unwanted sexual touches or contact with private parts
 - Penetration of any kind, or oral sexual acts
 - A child being forced to watch or perform sexual acts
 - Publishing or sharing sexualized images of a child (including AI-generated)
 - Exposing a child to pornography or sexualized language or behavior
 - c. Emotional or psychological abuse:** Treatment that harms a child's self-esteem, emotional well-being, or mental health. Examples include humiliation, intimidation, threats, controlling or manipulative behavior, belittling, shaming, isolation, neglect,

exclusion, spreading rumors, gaslighting, or discriminatory statements based on race, gender, sexuality, ability, or other identity factors.

- d. **Neglect:** Failing to provide for a child's basic needs or protect them from harm. This can include ignoring or invalidating a child's needs for food, shelter, medical care, education, emotional support, or safety.
 - e. **Bullying:** Repeated or severe behavior by peers intended to intimidate, insult, offend, frighten, or humiliate a child or a group of children. A single incident may also be considered bullying if it is particularly harmful.
- **Discrimination:** treating a child unfairly or negatively because of their actual or perceived identity, background, or characteristics. This includes, but is not limited to, differences in age, ethnicity, race, skin color, nationality, religion, disability, gender, gender identity or expression, sexual orientation, family, appearance, or health. Discrimination can range from subtle microaggressions to overt harassment or abuse. Examples include racial or sexist slurs, stigmatizing a child for their health or background, or denying a child access to a service or activity based on who they are.
 - **Exposure to violence:** when a child witnesses, or is indirectly affected by, acts of violence, abuse, or exploitation, which can harm their emotional well-being, development, or sense of safety.
 - **Exploitation:** Any act that takes advantage of a child in a way that causes, or could cause, harm to their health, development, dignity, or rights, for the benefit of another person or group. Exploitation can take different forms, including:
 - a. **Child labor:** Any work or activity that is harmful to a child's physical or mental development, interferes with their education, or deprives them of their childhood and dignity. This includes work done under coercion, threat, or conditions that exploit the child's vulnerability.
 - b. **Child sexual exploitation:** Any situation in which a child is manipulated, coerced, or used for sexual purposes in exchange for money, goods, services, or other benefits. This includes sexual abuse, the production of sexualized images, or other sexualized activities, and always involves a power imbalance and harm to the child.
 - c. **Child trafficking:** The recruitment, transportation, transfer, harboring, or receipt of a child through coercion, deception, or abuse of their vulnerability, for the purpose of exploitation. Child trafficking may involve forced labor, sexual exploitation, or both.
 - **Online abuse:** Any form of abuse, exploitation, or harassment that takes place through digital channels, including social media, messaging platforms, or online games. Online abuse can involve sexual content, bullying, manipulation, or exposure to harmful material.
 - **Grooming:** The process of building trust with a child online or offline in order to manipulate, exploit, or abuse them.

- **Inappropriate relationship:** Any relationship between a staff member (or associated person) and a child that falls outside the professional scope of their role and may put the child at risk of harm.
- **Safe relationship:** A relationship between a staff member (or associated person) and a child that is professional, appropriate to the child's age, and limited to the responsibilities of the role. Safe relationships avoid any behavior that could confuse, manipulate, or put the child at risk, including physical contact, favoritism, or private communications outside program activities.

5. Measures to prevent child harm

I. Design of the activities

IRC ensures that all activities involving children are planned and implemented with the highest standards of safety, dignity, and child-centered care, guided by the best interests of the child. All actions prioritize children's safety, well-being, and holistic development.

- a. **Best Interests of the Child:** Every decision, activity, and interaction is guided by what serves the child's safety, well-being, and development above all other considerations.
- b. **Child-centered planning:** Activities are designed based on thorough needs assessments, considering children's age, abilities, context, and specific needs. Children are encouraged to express their opinions, share feedback, and participate in activity design in a safe and age-appropriate manner. Their perspectives are actively considered in decision-making.
- c. **Risk identification and mitigation:** Potential hazards to children are identified during project design, and strategies are integrated to prevent, reduce, or manage harm.
- d. **Inclusion and non-discrimination:** Activities are accessible, equitable, and designed to promote participation of all children regardless of background, ability, or identity.
- e. **Safe environment:** All spaces, materials, and methods used in activities are appropriate, safe, and conducive to children's physical, emotional, and developmental well-being.
- f. **Supervision and support:** Children are supervised at all times by trained staff or volunteers. For children with disabilities or special needs, additional appropriately trained support personnel are provided as required.
- g. **Staff training:** Staff and volunteers receive comprehensive training to recognize risks, uphold safeguarding standards, and respond effectively to any concerns.
- h. **Compliance and monitoring:** Activities are regularly monitored to ensure adherence to safeguarding policies, with prompt action taken in response to any concerns, violations, or emerging risks.
- i. **Adaptability and continuous improvement:** Activities are flexible to respond to new risks, contextual changes, or specific needs of children. Ongoing evaluation ensures programs remain safe, effective, and aligned with IRC's child protection standards.

II. Safe recruitment

Safe recruitment procedures for IRC are based on IRC's [global organizational child safeguarding policy](#) and related documents, the [Polish Labor Code](#), [the Act on Counteracting the Threat of Sexual Crimes and Protection of Minors](#), [GDPR](#), and other relevant legislation.

IRC ensures that all recruitment processes prioritize the safety, well-being, and best interests of children. Every step is designed to select staff and volunteers who are trustworthy, competent, and committed to child safeguarding principles.

- a. **Clear safeguarding expectations in job postings:** All job offers include information on child protection responsibilities, the do-no-harm principle, and relevant IRC safeguarding policies, including the Global Child Safeguarding Policy and the Child Protection Policy.
- b. **Child safeguarding assessment during interviews:** For roles involving contact with children, interviews include dedicated questions to assess the candidate's understanding of and commitment to child protection standards.
- c. **Comprehensive background checks:**
 - Candidates must provide extracts from [the National Criminal Register](#) covering offenses specified in Polish law (Chapters XIX and XXV of the Penal Code, Article 189a, and the Act on Counteracting Drug Addiction).
 - Candidates who hold foreign citizenship, or who have lived abroad for more than 3 months in the past 20 years, must provide [equivalent criminal record checks from their country of residence or citizenship](#).
 - If obtaining such records is not possible, candidates must provide a written self-declaration confirming the absence of relevant convictions or court orders, in line with Article 21, clause 7 of the Act on Counteracting the Threat of Sexual Crime and Protection of Minors.
 - [IRC also conducts checks in the Sex Offenders Registry with Limited Access.](#)
- d. **Policy acknowledgment and compliance:** All IRC Poland staff, as well as collaborators including contractors, subcontractors, and volunteers, must read this Policy and confirm their understanding and commitment to comply before undertaking any IRC activities. Any breach of this Policy will be addressed appropriately, including disciplinary action for staff, contractual accountability for collaborators, or immediate termination of agreements where necessary.
- e. **Candidate briefing and contractual obligations:** All employment contracts include ethical clauses referencing the IRC Global Safeguarding Policy and the Child Protection Policy, which employees must read, acknowledge, and adhere to before starting their duties.
- f. **Reference checks:** New hires must provide references from previous employers. Reference forms include questions specifically related to any prior incidents of ethical misconduct or safeguarding concerns.
- g. **Onboarding and training:** HR and the Safeguarding team provide newly hired staff with comprehensive onboarding and training covering necessary child safeguarding responsibilities, ethical standards, reporting procedures and protocols for concerns or incidents, and legal obligations, including pre-employment criminal checks and compliance requirements. For staff who will have direct contact with children, additional, more comprehensive training is provided by the Child Protection Specialist.

III. Safe relations rules

a. Staff – children

All IRC staff and collaborators must maintain **professional, safe, and age-appropriate relationships with children at all times**. Interactions must respect the child's dignity, rights, and personal boundaries, and avoid any behavior that could cause confusion, harm, or exploitation. Staff are expected to:

- **Uphold key principles when interacting with children:**
 - Treat all child clients equitably, without discrimination or favoritism.
 - Ensure meaningful participation of children in activities and decisions, appropriate to their age and abilities, respecting their voice, opinions, wishes, and ideas.
 - Treat every child with respect and dignity, applying an intersectional lens to consider overlapping factors such as gender, disability, ethnicity, and socioeconomic background that may affect their needs and vulnerabilities.
 - Maintain professional boundaries, avoiding any contact or interaction outside the scope of their responsibilities.
 - Listen, acknowledge, and act appropriately on feedback or concerns raised by children.
 - Use appropriate language and approaches based on the child's developmental stage, needs, and context.
 - Contribute to a culture of transparency, openness, and accountability in all matters related to child protection.
- **Maintain clear boundaries:** Physical contact, communication, and interactions should always be appropriate to the child's age, cultural context, and the activity being conducted.
- **Act professionally:** Staff must avoid favoritism, personal relationships, or private communications with children outside the scope of program activities.
- **Supervision and support:** Children must always be supervised by trained staff during IRC activities. Adequate support should be provided for children with disabilities or additional needs. Activities should have enough trained staff to ensure safety, considering the number of children, their age, abilities, and needs. Staff must provide guidance and support while maintaining professional boundaries.
- **Guardian consent:** All activities involving children require informed consent from their legal guardians. Children may only participate without a caregiver present if consent has been obtained and the environment is appropriately supervised by trained staff. These requirements apply to all IRC activities, whether in-person or online, ensuring children are safe, supported, and able to participate meaningfully.
- **Reporting concerns:** Any suspicions, incidents, or risks of harm or inappropriate behavior must be reported immediately according to IRC reporting procedures.

By following these rules, IRC ensures that all interactions and activities are safe, child-centered, and conducted in the best interests of the child, promoting a supportive, protective, and accountable environment for every child.

b. Children – children

IRC is committed to ensuring that all interactions between children are safe and respectful. All children should interact with one another with respect, empathy, and care at all times.

Guided appropriately by adults, children who are able to do so should recognize and respect differences in age, abilities, backgrounds, and needs of their peers, and interact in a safe and supportive manner. These principles aim to prevent physical, emotional, or other forms of harm and to create an environment where every child feels valued, included, and able to participate safely and meaningfully.

Children are expected to:

- Treat others with respect, kindness, and empathy.
- Avoid any form of bullying, discrimination, harassment, or exclusion, whether verbal, physical, or online.
- Respect differences in identity, background, abilities, and opinions.
- Communicate in a non-harmful and age-appropriate way.

Staff are responsible for:

- Role modelling positive behavior and reinforcing respectful, inclusive interactions between children.
- Monitoring interactions and identifying risks or early signs of harm.
- Preventing and responding to harm: taking immediate and appropriate action if one child causes harm to another.
- Supporting conflict resolution in a fair, child-sensitive, and non-stigmatizing manner.
- Ensuring that children have access to safe and appropriate ways to raise concerns, and responding in line with IRC safeguarding and reporting procedures.

By fostering safe and respectful peer interactions, IRC ensures that all children can participate in activities in a supportive, inclusive, and protective environment.

IV. Staff trainings

Education and training are central to **preventing harm to children** in all IRC activities. Staff and collaborators are equipped with the knowledge, skills, and awareness needed to maintain safe environments and act responsibly.

- **Mandatory child safeguarding training:** All staff, volunteers, and collaborators must complete foundational training on child protection principles, ethical conduct, safe interactions, and reporting procedures before engaging in any activities involving children.
- **Role-specific training:** Staff working directly with children receive specialized instruction from the Child Protection Specialist. This includes recognizing signs of harm or exploitation, applying professional boundaries, and managing program-specific risks.
- **Digital safety training:** Staff are trained to prevent risks in online or technology-enabled programs, protect children's privacy, and obtain proper consent for photos, videos, or other media, in line with IRC policies.
- **Ongoing refreshers:** Refresher sessions and updates ensure all personnel remain informed about evolving risks, policy changes, and emerging best practices.

- **Access to expertise:** Safeguarding and Child Protection professionals in Poland are always available for staff to consult regarding questions, guidance, or support related to child protection concerns or scenarios.

V. Awareness and access

IRC ensures that all children and their caregivers are informed about the Child Protection Standards and understand their rights and responsibilities. Staff explain the policy in ways appropriate to age, context, and format, so that everyone knows what behaviors are expected, what is prohibited, and how to raise concerns safely.

- **Child- and youth-friendly information:** Providing age-appropriate versions of the policy, including a child-friendly version for younger children and a youth-friendly version for teenagers, so that all participants can fully understand it. Caregivers are also informed about the policy and have access to the standard version, ensuring transparency and clarity.
- **Explanation for every child:** Before participating in any IRC activities for the first time, children and youth are guided through the policy thoroughly. Staff ensure that participants understand their rights, the expected behaviors of staff, and how to report concerns, including confidential or anonymous options.
- **Ongoing accessibility:** Ensuring the policy and reporting information are always available, including digital formats for online activities, so children and caregivers can safely refer to it whenever needed.

VI. Online safety and digital protection

IRC recognizes that some activities with children take place in digital spaces, including online programs, social media, or through provision of equipment or internet access. All safeguarding standards that apply in person also apply online, with additional care to address digital risks. Key rules for digital engagement include:

- **Additional risk-aware planning:** Activities using social media, digital platforms, or technology are designed with careful consideration of potential risks, especially for vulnerable participants including, children. Measures are implemented to prevent exposure to inappropriate content, exploitation, or harassment.
- **Staff training:** Staff are trained on digital literacy, online safety, and child safeguarding, ensuring safe engagement with children and youth online.
- **Professional conduct:** IRC Persons must communicate with children only via official channels, maintaining professional standards at all times, and must never disclose private or confidential personal information online. All interactions online must reflect the spirit and intent of The IRC Way.
- **Consent and assent:** Informed consent from legal guardians is always required for photographing, filming, or using personal data of children online. Where the child is capable of understanding, their informed assent must also be sought. If a child does not assent, their wishes must be respected, and the material must not be used. Safety, dignity, and privacy of the child remain the primary considerations.
- **Supervision:** Online sessions with children are monitored by trained staff, ensuring children's safety and providing the ability to respond immediately to risks or incidents.

- **Data protection:** All digital content and personal data are handled securely and confidentially, in line with GDPR and other applicable regulations, with access limited to authorized personnel.

6. Response to child harm

IRC is committed to ensuring that all children and youth in our programs are protected from harm. Any staff member, volunteer, or associated person who knows or suspects that a child may be at risk is required to act immediately. **Suspicion alone is sufficient to act.** Certainty is not required. All responses to child harm are guided by survivor-centered principle.

Immediate steps to take (in any case – always):

1. **Ensure the child's safety first.** If a child is in immediate danger to life or health, call emergency services (112 or 997) before doing anything else. Remain with the child, or ensure that another trusted adult stays with them until help arrives.
2. **Contact a Child Protection Focal Point.** If you are unsure what to do, which procedure applies, or whether the situation is a concern or suspicion, always contact one of the Child Protection Focal Points for guidance or support:
 - **Anna Rzym** - Phone: +48 696 701 049, Email: ewa.kasiarz@rescue.org
 - **Ewa Weronika Kasiarz** - Phone: +48 537 611 012, Email: anna.rzym@rescue.org
 - **Maciej Król** - Phone: +48 537 687 152, Email: maciej.krol@rescue.org

Intervention Procedures

Once the child is safe and a focal point has been contacted, staff follow response actions according to the type of harm. The procedures are divided into four categories:

- I. Internal procedures: harm caused by IRC staff or associated persons**
- II. External procedures: harm caused by other adults, including adult clients**
- III. Peer violence procedures: harm caused by other children, including child clients**
- IV. Unaccompanied children: cases involving children without parental or guardian care**
- V. Mandatory reporting obligation in Poland**

Each category has clear steps for staff to follow, with visual guides provided to support prompt and appropriate action.

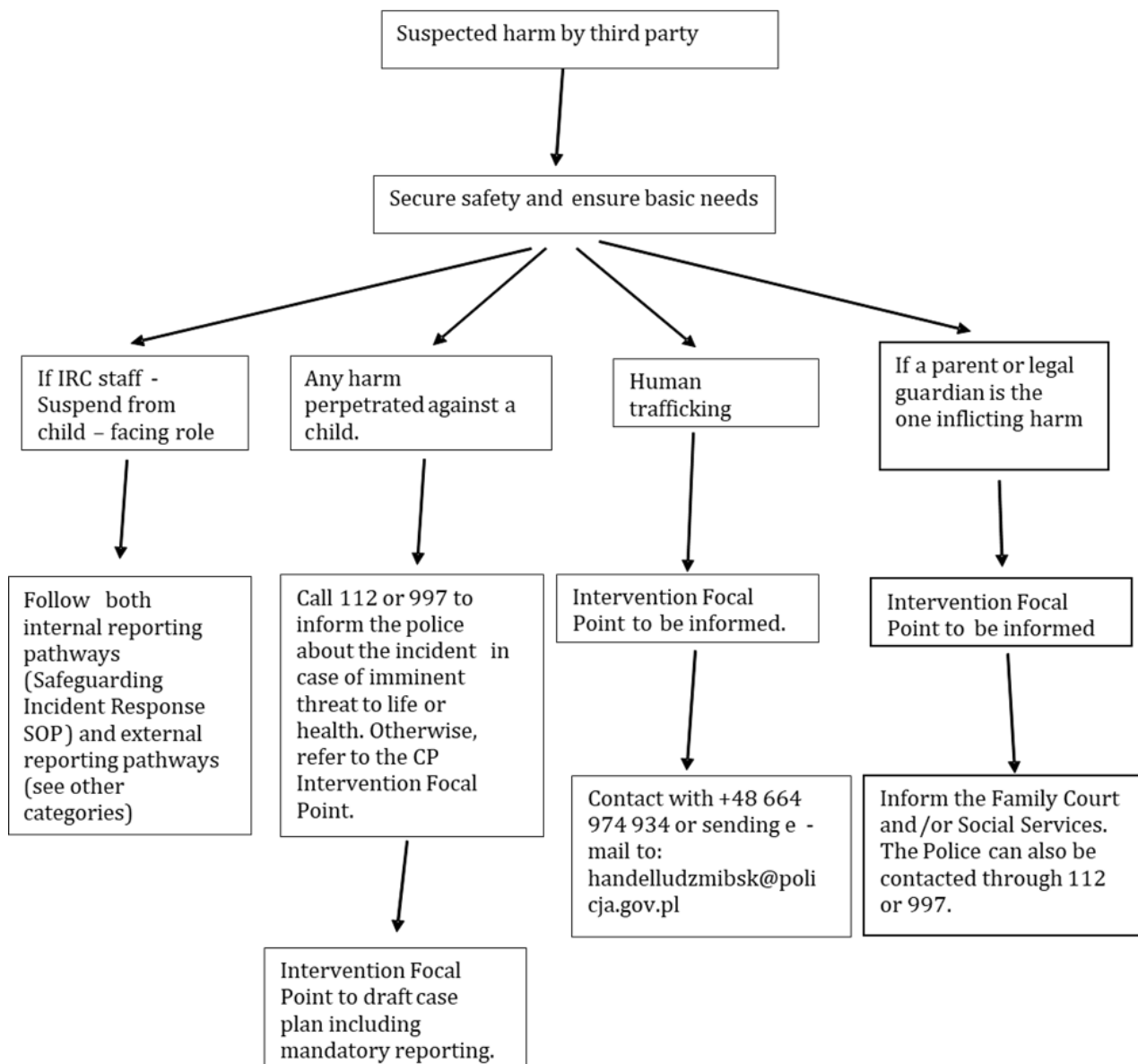
I. Internal procedure: Harm caused by IRC Staff or associated persons

- a. If an IRC employee suspects abuse by an adult with a contractual relationship with IRC, the person must be immediately removed from working with children until the matter is clarified.
- b. At least one of the Child Protection Focal Points should be informed immediately, since mandatory reporting requirements and internal reporting pathway must be followed (outlined in [Poland CP Safeguarding SOP](#)) in addition to the steps described below (II).
- c. The Child Protection Focal Point will ensure further coordination of child-centered support, staff compliance and reporting to relevant authorities when required.

II. External procedure: Harm caused by other adults (including adult clients of IRC)

- a. If an IRC employee becomes aware of harm or **suspected abuse by an adult who is not an IRC staff member**, they must immediately:
- (1) ensure the child's safety and provide for basic needs.
 - (2) if child is in a life or health threatening situation, call 112 or 997 to inform police immediately. Stay with the child until they arrive or make sure other trusted adult does.
 - (3) if child is safe (and away from the person who caused harm), inform at least one of the Child Protection Intervention Focal Points. They will ensure further coordination of the child-centered support services.
 - (4) In cases when no CP Intervention Focal Point can be contacted, the staff member must report directly to the police and inform the focal point as soon as possible.
- b. In cases when **a parent or legal guardian is the person who caused harm**, the CP Focal Point will guide and support contacting the closest Family Court or social services when necessary. Other steps remain as above.
- c. In cases when there is **suspected child trafficking**, in addition to the procedure above (or in cases when no CP Intervention Focal Point can be contacted it is required), staff may contact:
- Phone: +48 664 974 934
 - Email: handelludzmibsk@policja.gov.pl
 - Reports can be made anonymously. In urgent situations (for instance , a child traveling with the offender), police should be contacted immediately.

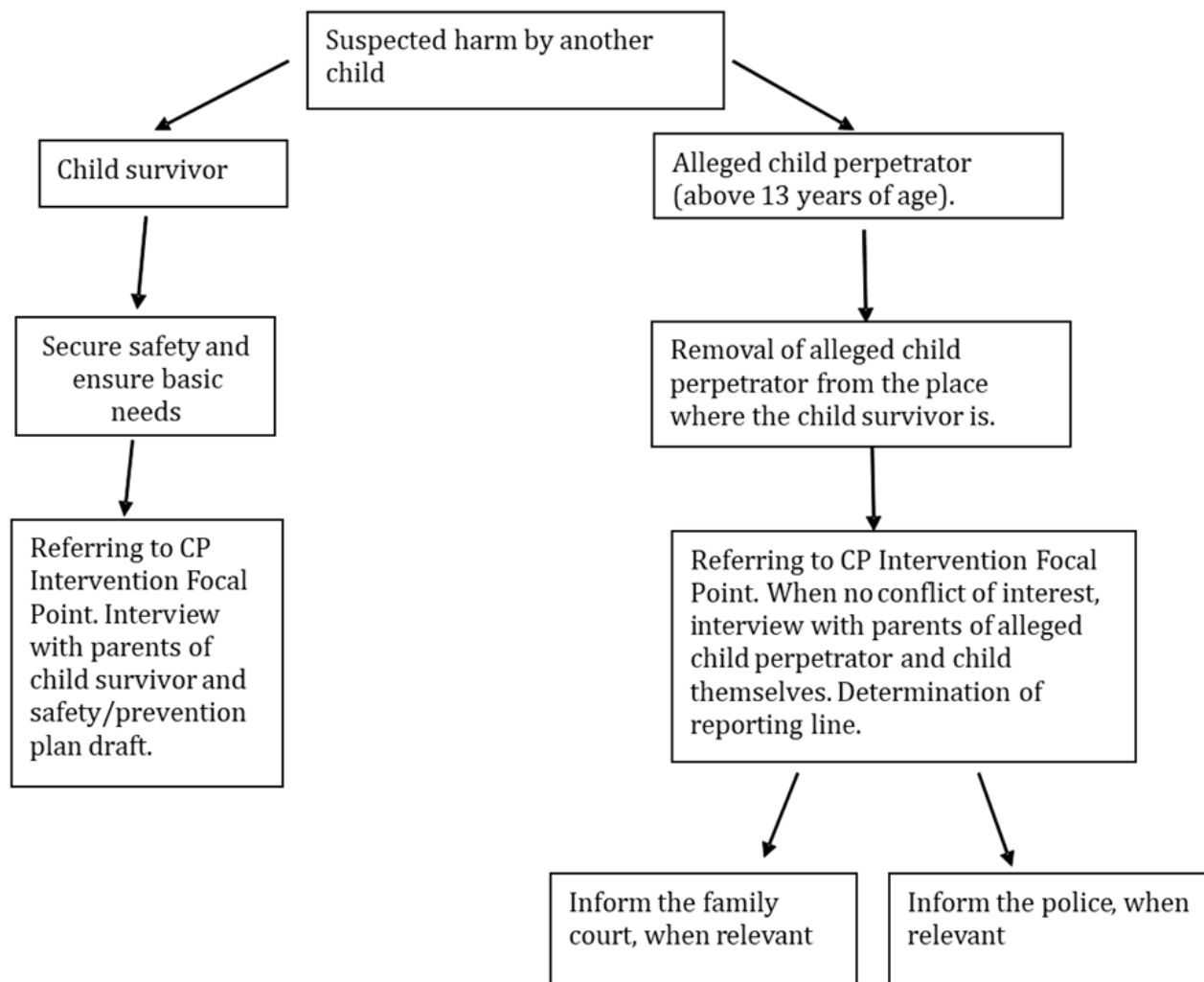
(see picture below)



III. Peer violence procedure: Harm caused by other children (including child clients)

- a. If an IRC employee becomes aware of harm or suspected abuse by another child, they must immediately:
 - (1) ensure the child’s safety and basic needs:

- i **Separate the child who experienced harm from the alleged perpetrator.**
 - ii Provide immediate support if needed.
- (2) **call emergency services if there is immediate danger:**
- iii If the child is in a life- or health-threatening situation, call 112 or 997 immediately.
 - iv Stay with the child until help arrives, or ensure another trusted adult does.
- (3) notify the Child Protection Intervention Focal Point:
- v If the child is safe, inform at least one focal point for further guidance.
 - vi The focal point will coordinate child-centered support, including:
 - Contacting the caregivers of both children, where appropriate.
 - Ensuring the child who caused harm is also safe and supported.
 - Ensuring the child who experienced harm receives necessary support, including PFA.
 - Informing relevant authorities or service providers if required.
- (4) if focal point is unavailable:
- vii The staff member must remain with both children to ensure safety of each child, asking other IRC colleagues for support.
 - viii Contact a CP Focal Point as soon as possible. In emergencies, never wait - call 112 or 997 immediately.

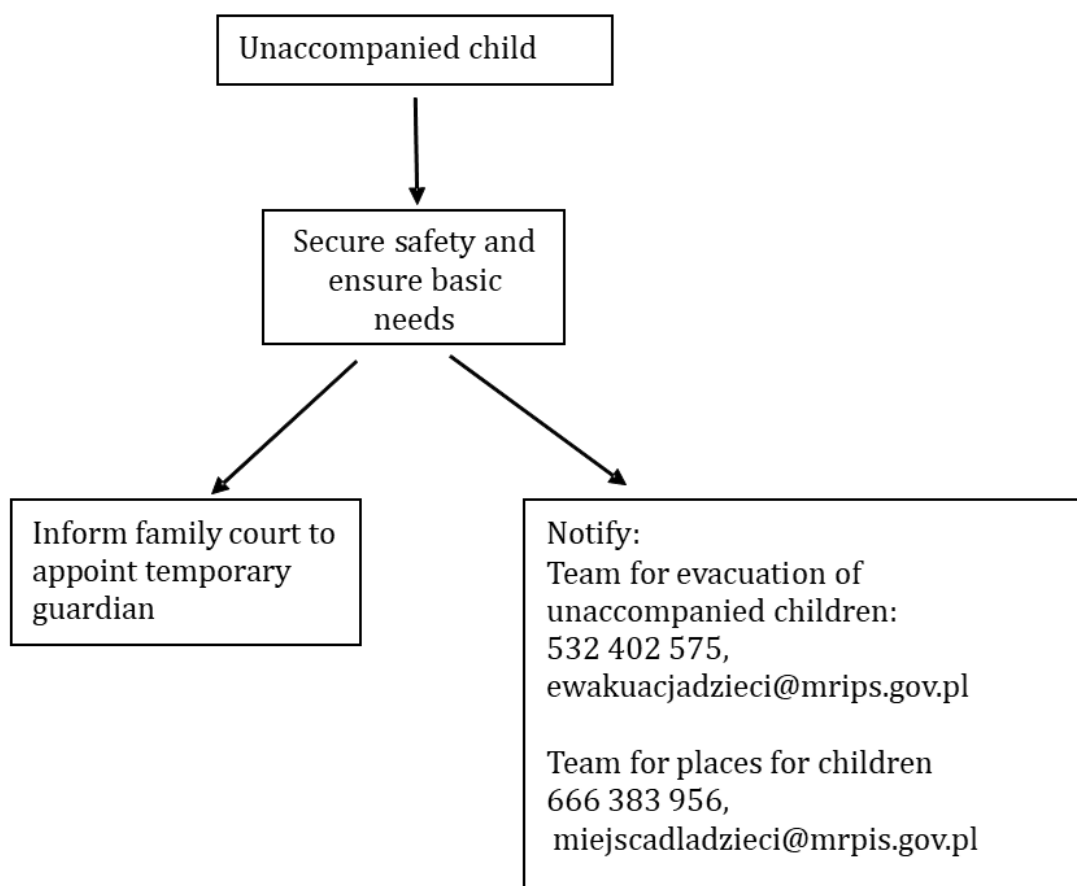


IV. Unaccompanied children - cases involving children without parental or guardian care

- a. If an IRC employee becomes aware of an **unaccompanied child**, they must:
 - (1) ensure the child's safety as well as provide basic needs if needed (food, clothing etc.). **Prevent the child from leaving the premises/place unsupervised.**
 - (2) if the child's life or health is at immediate risk, call 112 or 997 immediately. Remain with the child until help arrives, or ensure another trusted adult does. If child is safe, skip to (3).
 - (3) contact at least one of the Child Protection Intervention Focal Points. They will coordinate with the relevant authorities and ensure child-centered support.

(4) If the focal point cannot be reached in time or at all, the employee is responsible for following the next steps:

- i. Inform the local Family Court or social services about the child's presence. Notifications should be in writing if possible **unless immediate support is needed** - in such cases go to the closest social services or call police to ensure a child has place to stay. You can also contact the team for evacuation of children (see picture below).



V. Mandatory reporting obligation in Poland

Legal Framework in Poland:

- **Article 304 §1 of the Code of Criminal Procedure (Kodeks postępowania karnego)** – establishes a *social obligation* for anyone who becomes aware of a crime prosecuted ex officio to notify the police or prosecutor;
- **Article 240 §1 of the Criminal Code (Kodeks karny)** – establishes a *legal (criminally enforceable) obligation* to report specific serious crimes, including certain offenses against children (in particular sexual offenses, severe violence, and deprivation of liberty).

Failure to report crimes listed under Article 240 §1 may result in criminal liability. This does not apply to survivors themselves or persons who can reasonably expect law enforcement is aware of crime committed.

A staff member must report directly to the police or prosecutor if they have reasonable suspicion that a child has been a victim of a criminal offense prosecuted ex officio (ścigane z urzędu), in particular:

- Physical abuse causing injury (e.g. bodily harm, beating)
- Sexual abuse or exploitation of a child (including any sexual acts, grooming, or exposure to sexual content)
- Severe neglect that endangers the child's life or health
- Domestic violence (including psychological abuse where it may constitute a criminal act)
- Child trafficking or unlawful deprivation of liberty
- Any other crime against a child's life, health, or freedom

In particular, mandatory reporting under **Article 240 §1 of the Criminal Code** applies to suspicion of offenses such as:

- Rape and sexual acts with a minor (Articles 197, 200 CC)
- Sexual exploitation of a dependent (Article 198 CC)
- Unlawful deprivation of liberty (Article 189 CC)
- Severe bodily harm (Article 156 CC)

Suspicion alone is sufficient to trigger this obligation, and proof or certainty is not required.

Duty Bearers:

- Any staff member who becomes aware of or suspects such a crime is individually responsible for reporting
- The obligation applies regardless of whether a Child Protection Focal Point has been contacted
- Internal reporting does not replace the legal duty to notify authorities

How to report:

- Reports should be made immediately to:
 - Police (112 or 997 in urgent situations)
 - Local police station or public prosecutor's office (Prokuratura) in non-emergency cases
- Reports can be made orally or in writing
- Anonymous reporting is permitted, but staff are encouraged to provide contact details to support proceedings.

The Focal Points (Section 6, point 2) should be informed as soon as possible. They provide guidance on reporting and ensure coordination of support, however, they do not assume or replace the individual's legal obligation to report.

7. Conclusion

1. The policy is communicated at the IRC Poland's landing page, and accessible in all office spaces in document form.
2. The policy is acknowledged by all new hires of IRC by signature upon first day of contractual relationship with the IRC.
3. The policy is being communicated to all staff during regular trainings delivered by or in coordination with the policy owner at least once for every new IRC's hire.
4. **This policy enters into force after approval by the Country Director**
5. In any case, especially in case of changes in the relevant legislation constituting the basis for the policy, the revision is being conducted immediately by the policy owner - **Child Protection Lead for IRC Poland Country Program**.
6. The changes to policy are being announced with All Staff.
7. The SMT bears the ultimate responsibility for the implementation of the Policy.
8. For the data protection issues not specified within the contents of the policy, the rules and regulations of GDPR are applicable.
9. The policy is reviewed at least on a bi-annual basis, by the policy owner, taking into account especially updates in the referral pathways, roles and responsibilities, contact data, profile of child client facing activities; the next revision in **October 2026**.

Endorsed by:


box SIGN 42LKLWZP-18V35L62

Dariusz Ziętek - Country Director
