



GARY'S CAMP

MINORS PROTECTION STANDARDS

PREAMBLE

Pursuant to the legal obligation stemming from the Act of 13 May 2016 on Counteracting Threats of Sexual Crime and the Protection of Minors to implement standards to the extent necessary to ensure the protection of Minors by entities providing hospitality and tourist services, as well as other collective accommodation facilities and recognizing the important role of Gary's Camp in ensuring respect for the rights of Children, especially the right to protect their dignity and freedom from all forms of harm and abuse, Gary's Camp adopts this document as a model of standards, rules and procedures to be followed in the event of a suspicion that a minor Participant of the Camp is being harmed and makes all the efforts to prevent such threats.

These Minors Protection Standards have been developed with the utmost care to ensure the adequate protection and safety of all minor Participants of Camps organized by Gary's Camp. Compliance with the provisions of these Standards is obligatory for all persons involved in the activities of Gary's Camp.

This document outlines the policies and procedures designed to prevent Minors from harm and defines the responsibilities of Gary's Camp's Staff for the safety of Children in their care and, if harm is done, the methods of minimizing its effects through the provision of the appropriate assistance to the Child.

- Act of 29 July 2005 on Counteracting Domestic Violence (Journal of Laws of 2021, item 1249 and of 2023, items 289 and 535);
- Act of 28 July 2023 amending the Act - Family and Guardianship Code and certain other acts (Journal of Laws of 2023 item 1606);
- Act of 10 May 2018 on the Protection of Personal Data (consolidated text: Journal of Laws of 2019, item 1781);
- Convention on the Rights of the Child (Journal of Laws of 1991, No. 120, item 526);
- Convention on the Rights of Persons with Disabilities (Journal of Laws of 2012, item 1169);
- Act of 7 September 1991 on the Education System - art. 92a (Journal of Laws of 2022, item 2230, as amended);
- Ordinance of the Minister of National Education of 21 January 1997 on the conditions that must be met by organizers of school children's and youth's recreation, as well as the principles of its organization and supervision (Journal of Laws of 1997, No. 12, item 67, as amended);
- Act of 6 June 1997 - Penal Code (Journal of Laws of 1997, No. 88, item 553).

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§1

[Introductory provisions]

1. The purpose of these Minors Protection Standards is to establish principles for the protection of Minors participating in Camps organized by Gary's Camp.
2. These Standards have been developed with the utmost care to ensure the safety of Participants during the Camps.
3. All persons involved in the organization of the Camps must comply with these Standards - in particular the Staff, Instructors, drivers, volunteers and other participants of these events to the extent that their behavior may affect the safety and well-being of Minors.

§2

[Defined terms]

Child/ Minor	any person under 18 years of age.
Child's Personal Data	any information that identifies the Child, including his or her name, surname and image;
Gary's Camp	the organizer of the Camps - Gary Kozlowski conducting business activity under the name Gary's Camp Gary Kozlowski, Niebieska 5 street, Postal code: 80-180 Jankowo Gdańskie, having NIP No. (<i>Tax ID No</i>): 5833113794 and REGON No. (Statistical ID No.): 221104518.
Staff	any person employed by Gary's Camp under an employment contract or a civil law contract (both paid and unpaid) or performing activities for Gary's Camp, e.g. an intern, volunteer, also if they are a parent or legal guardian of a Child.
Candidate	a person applying for employment or seeking to establish another form of collaboration with Gary's Camp in the organization of Camps.
Camp	any tourist event or other form of recreation organized by Gary's Camp.
Participant	Any Minor participating in the Camp organized by Gary's Camp under the supervision of Instructors.
Instructor	an adult person appointed to provide care and supervision over Minors during the Camps.
Guardian	a legal representative of the Child (i.e. a parent or a guardian), a foster parent or a temporary guardian.
Facility	premises on which the Camp is organized.

Abuse	<p>any conduct towards a Minor that constitutes a prohibited act, as well as the conduct (and the effects of such conduct) that leads to the violation of the rights, freedoms or personal rights of the Child and interferes with their development, in particular:</p> <ul style="list-style-type: none"> a. Physical violence – any behavior resulting in the violation of the Minor's bodily integrity b. Psychological violence – any behavior, both in-person and via means of distance communication, not constituting physical violence, causing the Child to feel threatened or lowering their self-esteem and sense of self-worth. c. Sexual violence – any behavior engaging the Minor in sexual activity against their will or violating applicable legal regulations d. Neglect – failure to meet the physical and mental needs of the Child by persons who are under such an obligation.
Incident	<p>an undesirable event that disrupts the course of the Camp, creates a threat to safety and constitutes a violation of these Standards.</p>
Intervention Register	<p>all documentation containing a register of disclosed or reported incidents or events threatening the well-being of the Child, kept according to the template in Appendix 1, including:</p> <ul style="list-style-type: none"> a. z a. report with the name of the reporting person; b. person/persons suspected of Abuse; c. type of intervention; d. date of intervention; e. documents created during the intervention;
Minors Protection Standards/ Standards	<p>rules of conduct binding the Instructors introduced by Gary's Camp in the performance of obligations arising from the Act of 13 May 2016 on Counteracting Threats of Sexual Crime and the Protection of Minors to ensure safe relations between Participants and Instructors during the Camps.</p>

§3

[Staff Recruitment]

1. Before employing or establishing any other form of cooperation with any person involving any type of work with Minors, Gary's Camp conducts a comprehensive background check of their qualifications and competences as well as undertakes all reasonable steps to eliminate any potential threat that the person could pose to the well-being and safety of Children.
2. During the recruitment process, Gary's Camp obtains the following data from Candidates:
 - a. name and surname;
 - b. date of birth;
 - c. contact details.

confirmed by verifying the Candidate's identity card.

3. Before starting cooperation with a given Candidate, Gary's Camp:
 - a. reserves the right to undertake the appropriate steps to obtain from the Candidate either references from previous workplaces or contact details of a person who may procure such references;
 - b. verifies whether the Candidate is listed in the Register of Sex Offenders. For this purpose, the Gary's camp must obtain from the Candidate the following data:
 - i. first name and surname;
 - ii. date of birth;
 - iii. PESEL No.;
 - iv. maiden name;
 - v. father's name;
 - vi. mother's name.
4. The Candidate is required to provide Gary's Camp with the information from the National Criminal Register regarding crimes specified in Chapters XIX and XXV of the Penal Code and other relevant legislation, including the Act of 24 April 1997 on the Prevention of Drug Abuse.
5. Any Candidates possessing the citizenship of a country other than the Republic of Poland must additionally submit information from the criminal register of their country of origin in connection with their professional or volunteer activities involving or related to Children.
6. If obtaining the information referred to in paragraph 5 above proves impossible, the Candidate shall submit a Declaration of No Criminal Record involving acts commensurate with the prohibited acts specified in Chapters XIX XXV of the Penal Code. A template of such declaration is provided in Appendix 3 to the Standards.
7. A Candidate who has successfully passed the Gary's Camp recruitment process is required to submit a Declaration of Voluntary Compliance with the Minors Protection Standards, which constitutes Appendix 2, and the Principles of Safe Interactions which constitute Appendix 4 to these Standards.
8. The lack of consent of the Candidate to submit declarations referred to above in this paragraph renders any form of collaboration between the Candidate Gary's Camp impossible.

§4

[Principles of Safe Interactions between Staff and Minors]

1. The protection of the welfare of the Child is guiding principle of all activities undertaken by Gary's Camp and the Staff.
2. During the Camps, Gary's Camp Staff exercise constant supervision over Participants to ensure the fullest possible protection of their safety.
3. Gary's Camp undertakes actions to protect children from Abuse, in particular by establishing:
 - a. the group of people responsible for receiving reports of Incidents and providing Minors with appropriate support;
 - b. the method of documenting and principles of storing disclosed or reported Incidents or incidents threatening the well-being of Minors;
 - c. the scope of competences of the person responsible for preparing Gary's Camp and the Staff to apply these Standards as well as the scope of responsibility of the Staff themselves;
 - d. the principles of safe recruitment of Gary's Camp Staff;
 - e. the principles of safe interactions
 - f. the principles and procedures for undertaking interventions in the event of a suspicion of Abuse or learning or having information about a Minor being abused;
 - g. the principles and methods of making the Standards available to the Guardians for their information and further implementation;

- h. the principles of protecting the Child's image and the Child's Personal Data;
 - i. the principles of amending and updating the Standards;
 - j. the principles ensuring safe relationships between Minors and the Staff, in particular specifying prohibited behaviors towards Minors
4. The Staff treat Minors with due respect, considering both their dignity and their legitimate needs.
 5. In communication with Minors, the Staff remains calm and patient, adapting the form as well as the content of messages addressed to Minors so that they are appropriate for their age and the context of a specific situation.
 6. The Staff organizes and engages in educational activities aimed at promoting and shaping proper social attitudes among Minors.
 7. The Staff supervises the behavior of Participants and responds decisively and appropriately to any manifestations of any Abuse of Minors.
 8. It is prohibited to:
 - a. use any form of violence by Staff towards Minors (including corporal punishment);
 - b. use vulgar language in communication with Minors;
 - c. engage in any form of discrimination towards Minors;
 - d. tell jokes and/or make comments with sexual overtones in the presence of Minors;
 - e. disclose Child's Personal Data to the unauthorized persons;
 - f. comment on the appearance and/or physical development of Minors;
 - g. violate the privacy of Minors (especially in places such as bathrooms, toilets, changing rooms, etc.),

§5

[Safe transportation of Participants]

1. Gary's Camp makes every reasonable effort to ensure safe transportation of Participants to the Facility.
2. Gary's Camp ensures that:
 - a. the means of transport are appropriately equipped and adapted to transport minor Participants, including that the vehicles are technically operational and have the necessary certificates and inspections;
 - b. the drivers transporting Participants have the required experience, appropriate qualifications and authorizations to transport people, in particular Minors;
 - c. during each transport of Minors to the Facility, Gary's Camp ensures an appropriate number of Inspectors who monitor the behavior of Participants and ensure their safety during transportation;
 - d. Before commencing journey to the Facility, Gary's Camp conducts appropriate training with the Inspectors on safety rules during the journey, including the use of seat belts, appropriate behavior in the event of a vehicle breakdown, evacuation procedures and proper conduct on the road.

§6

[Safe accommodation of Participants]

1. Gary's Camp ensures that the accommodation of Participants meets all requirements stemming from applicable legal regulations, in particular health, safety and hygiene standards regarding:
 - a. accessibility of emergency exits
 - b. appropriate marking of emergency routes;
 - c. protection against access to dangerous places (e.g. swimming pools, water reservoirs, steep stairs);

- d. provision of fire protection measures;
2. Gary's Camp ensures that the accommodation of Participants is inspected in advance to verify its compliance with the requirements referred to in paragraph 1 above.
3. In the event of any discrepancies or irregularities being found, Gary's Camp shall take immediate corrective and/or preventive actions to ensure that the accommodation complies with the requirements referred to in paragraph 1 above.
4. If ensuring compliance with the requirements referred to in paragraph 1 above proves to be too expensive, time-consuming or impossible to implement, Gary's Camp will take any actions necessary to change the Participants' accommodation to one that meets the requirements referred to in paragraph 1 above.
5. Gary's Camp provides the Participants with accommodation adapted to their age, gender, reasonable needs and special health requirements.
6. During the stay, Gary's Camp regularly monitors the conditions of Participants' accommodation and immediately responds to any reports of irregularities or discrepancies in Participants' accommodation standards, privacy violations and any other accommodation-related issues.

§7

[Safe Recreation]

1. All activities organized as part of the Participants' recreation during Camps are adapted to their age, physical and psychological capacities and health conditions.
2. Before organizing the Camp, Gary's Camp conducts a comprehensive and detailed risk analysis considering the terrain conditions, weather conditions, special needs of Participants as well as other relevant circumstances affecting their safety.
3. All activities carried out as part of Camps are conducted by persons with appropriate qualifications and experience and Gary's Camp undertakes takes any actions necessary to minimize the risk to the safety of Participants by using appropriate protective measures (e.g. protectors, helmets, protective clothing, etc.).
4. During the Camp, the Staff constantly monitors the well-being of Participants and immediately responds to any signs of fatigue, poor well-being or health problems and, if necessary, stops the classes or other activities to provide the appropriate assistance to Participants if necessary.
5. Gary's Camp ensures constant supervision of Participants during classes and other activities within the Camps by designated Instructors, the number of whom is adjusted to the number of Participants taking part in each Camp.
6. Gary's Camp creates and implements the Camp's program in a way that aims to minimize the number of situations in which Participants are left unsupervised.
7. Staff are obliged to make all reasonable efforts to be within sight or hearing range of other Staff members during the Camp.
8. During the Camps, all contacts and interactions between Minors and adults should take place in a tactful and transparent manner, while respecting the dignity of the Minor and observing the safety rules.
9. In a situation where a Staff member must be alone with a Child, they are obliged to notify other Staff members and, if possible and reasonable, the Child's Guardian, informing them of the place where they will be staying with the Child and the time at which such contact is to take place.
10. In the event of an urgent need to provide individual medical assistance to a Participant by a Gary's Camp Staff member and the simultaneous absence of another Staff member, such assistance should be provided to the Minor in a manner that ensures respect for the privacy and dignity of the Participant while maintaining safety principles.

11. The Staff is not allowed replace Minors or assist them in carrying out in personal activities (toilet, washing, changing, etc.) if the Minor is able to perform these activities themselves.
12. It is forbidden for Gary's Camp staff members or other adults to spend the night in the same bed with Participants.
13. Gary's Camp Instructors may spend the night in the same room with Camp Participants only in justified cases with the explicit consent of the Minors' Guardians expressed before the start of the Camp.
14. In case a Minor requires constant care at night due to their health condition or other justified circumstances, Gary's Camp will provide, after prior alignment with the Guardian or Guardians of the Minor, appropriate conditions for overnight stay, including a separate room for the Guardian or Educator who will provide the Participant with appropriate care and assistance while not violating the Minor's privacy or safety rules.

§8

[Safe recreation of Participants with special needs and disabilities]

1. Gary's Camp ensures that in all aspects of the organization and recreation within the Camps, the specific conditions of people with special needs and disabilities are taken into consideration by providing appropriate equipment, teaching materials and specialist support.
2. Before the start of the Camp, Gary's Camp obtains from the Guardians of the Minors information about their special health needs and disabilities, including not only medical diagnoses but also guidelines for daily care, dietary preferences, routine treatments and other important issues in order to adapt the activities carried out during Camps to the psychophysical capabilities of Participants with special needs and disabilities and to provide them with comfortable conditions of stay and full and equal participation in the Camp.
3. In the case of Participants requiring constant medical and specialist care, Gary's Camp takes all reasonable steps to organize such care during the Camp and to provide access to necessary medication, equipment and other necessary resources.
4. Gary's Camp takes into account and fully complies with the conditions stemming from the provisions of the applicable law regarding the storage of medical drugs and enabling their administration to Participants in a safe manner and in accordance with the recommendations of doctors.
5. Gary's Camp Staff pays particular attention to any manifestations of fatigue, deterioration of well-being, health problems or other disturbing circumstances in case of Participants with special needs and disabilities to immediately react and prevent them and, consequently, ensure undisturbed participation in the Camp.

§9

[Documentation and Reporting]

1. Gary's Camp keeps and stores detailed documentation related to the organization of the Camps, in particular documents concerning undesirable events that constitute a violation of the Standards.
2. If an Incident takes place, Gary's Camp prepares a detailed report describing the event, actions taken and recommendations to prevent similar situations from occurring in the future.
3. The template of the intervention report constitutes Appendix 1 to these Standards.
4. Gary's Camp stores all intervention reports in the Intervention Register.

§10

[Amending and Updating the Standards]

1. Gary's Camp regularly reviews these Standards, at least once a year, to update their content to render them fully compliant with the relevant requirements stemming from the provisions of applicable law.
2. Any changes to the Standards must be approved by the appropriate persons designated by Gary's Camp and made available to all persons involved in the organization and conduct of the Camps, including the Staff, Educators and Guardians.
3. Gary's Camp informs the persons listed in paragraph 2 above of any changes to the content of these Standards and ensures that everyone has access to their current version before the start of the Camp.

§11

[Staff training]

1. Staff members, Instructors and other persons involved in organizing and conducting Gary's Camps are required to complete mandatory training in the scope of protection of Minors, including, among others, issues such as:
 - a. safety procedures;
 - b. recognizing signs of danger;
 - c. principles of first aid;
 - d. crisis management;
 - e. communication with Minors;
 - f. respect for the privacy of Children,
 - g. legal issues related to the protection of Minors;
 - h. obligations related to reporting cases of violations of children's rights.
2. Gary's Camp regularly updates the knowledge of its Staff by organizing training and workshops to ensure that all its members are adequately prepared to perform their duties within the scope of Gary's Camp activities.

§12

[Final provisions]

1. These Standards shall enter into force on the date of their announcement.
2. Entities collaborating with Gary's Camp are obliged to comply with the Standards if their activities involve any contact with Minors.
3. Gary's Camp reserves the right to implement additional protective procedures and other relevant security measures to protect Minors if it deems it necessary due to the specificity of the Camp or the circumstances that occur.
4. The Minors Protection Standards are publicly available and are shared with Participants, Instructors and Guardians as well as any persons with whom Gary's Camp cooperates in any form in organizing Camps before their commencement.
5. Any violations of the provisions of the Minor Protection Standards will result in disciplinary consequences in accordance with Gary's Camp's internal procedures.
6. In the event a violation referred to in paragraph 5 above also constitutes a violation of applicable law – Gary's Camp is obliged to notify the appropriate authorities such as the police, family courts or child protection institutions to take appropriate legal action required.

1. Appendix 1 – Intervention Report
2. Appendix 2 – Declaration of Voluntary Compliance with the Minors Protection Standards;
3. Appendix 3 - Declaration of no Criminal Record
4. Appendix 4 – Principles of Safe Relationships;
5. Appendix 5 - Reporting and list of emergency telephone numbers.

Appendix 1 – Intervention Report

Name and surname of the Child	
Grounds for intervention	
Notifier	
Actions taken:	
Meetings with Guardians	
Form of Intervention	
Intervention details	
Intervention Result	

Appendix 2 –Declaration of Voluntary Compliance with the Minors Protection Standards

Exemplary declaration template

[place, date]

Declaration of Voluntary Compliance with
the Minors Protection Standards

I, the undersigned, having the PESEL number _____ hereby declare that I have familiarized myself with the Gary's Camp Minors Protection Standards and willingly undertake to comply with them.

[date and signature]

Załącznik nr 3 Oświadczenie o niekaralności i zobowiązaniu do przestrzegania podstawowych zasad ochrony małoletnich przed krzywdzeniem

Exemplary declaration template:

[place, date]

Declaration of No Criminal Record

I, the undersigned having PESEL number _____ hereby declare that I have never been convicted for a crime against sexual freedom and decency or a crime involving the use of violence against a minor and there are no criminal or disciplinary proceedings pending against me in the indicated scope.

I further declare that I have familiarized myself with the Gary's Camp Minors Protection Standards and willingly undertake to comply with them.

[date and signature]

Appendix 4 – Principles of Safe Interactions

All actions taken by the Staff must serve to protect the Minor's well-being and be consistent with their best interests. The Staff is obliged to treat Children with respect, taking into account their dignity and needs. Any use of violence in any form against the Participants is absolutely unacceptable. All actions are carried out in accordance with applicable law, internal procedures of Gary's Camp and within the limits of the Staff's competence.

These principles of safe relationships apply to the Staff and every adult person in contact with Minors under the care and supervision of Gary's Camp. Knowledge and acceptance of these principles must be confirmed by submitting an appropriate declaration in writing.

Interactions between the Staff and the Participants

Staff are required to maintain professional interactions with Minors. Every interaction with a Child should be carefully considered, appropriate to the situation, safe, reasonable and fair with regard to other Participants.

Staff must act in an open and transparent manner, minimizing the risk of misinterpretation of their behavior.

Communication with Minors

1. Always be patient and respectful in communication with Children.
2. Listen carefully to Minors and provide answers appropriate to their age and their situation.
3. It is forbidden to embarrass, humiliate, disrespect or insult Participants.
4. Do not disclose sensitive information about a Minor to unauthorized persons, including other Minors. This applies to the image of the Child and information about their family, economic, medical, care and legal situation.
5. Inform the Child about decisions that concern them and try to take into account their expectations.
6. Respect the Minor's right to privacy. In situations where it is necessary to depart from the principle of confidentiality to protect the Participant, explain this to them as soon as possible.
7. When conducting activities with Participants, make sure to be within the sight or hearing range of other Staff members. In situations where you must be alone with a Minor, inform other members of Staff and the Guardian where you will be staying.
8. Inappropriate behaviour in the presence of Children is prohibited, including the use of expletives, vulgar gestures or jokes, making offensive remarks, referring to sexual activity as well using physical advantage or power.
9. Assure Children that they have the right to report their concerns about inappropriate behaviour from the members of Staff or any other persons and can expect an appropriate response and assistance.
10. Address the Minor by their name in the form they prefer, respecting their identity and expression.
11. Use alternative forms of communication with Participants who need it, taking into account their psychophysical capabilities.

Activities involving the Participants

1. Appreciate and respect the contribution of Minors to the activities undertaken, actively engaging them and treating them equally, regardless of gender, sexual orientation, ability, social status, ethnicity, culture, religion or worldview.
2. Avoid any form of favouritism with respect to Minors.
3. Establishing romantic or sexual relationships with Minors as well as making proposals of an indecent nature is strictly prohibited. This also includes sexual comments, jokes, gestures and sharing erotic and pornographic content.
4. The image of a Child must never be recorded for private purposes. This also applies to allowing third parties to take photos or recordings of Minors without the consent of Gary's Camp and/or Guardians of the Minors.
5. Offering alcohol, tobacco or nicotine products and illegal substances to Children is prohibited, as well as using them in the presence of Minors while performing official duties.
6. Do not accept money or gifts from Minors or their Guardians, nor enter into a relationship of dependency that could be grounds of allegations of unfair treatment.
7. Any ambiguous or risky situation in which a Child is infatuated with a Staff member or vice versa must be reported to Gary's Camp immediately. React firmly but with care.

Physical contact with the Minors

Engaging in any violent actions against Children are unacceptable. However, there are situations in which physical contact may be appropriate, if it is a response to the needs of the Minor, taking into account their age, stage of development, gender as well as cultural and situational context. Any such contact must be thought out, consulted with the Child and conducted with caution.

1. Never hit, poke or push a Minor.
2. Never touch a Child in a way that could be considered indecent or inappropriate.
3. Always be prepared to justify and explain your actions.
4. Avoid activities such as tickling, mock fighting or rough physical play.
5. Take special caution with regard to Children who have been victims of violence and respond firmly to any attempts by Minors to engage in inappropriate physical contact.
6. Physical contact cannot be hidden or associated with gratification. Any such behavior by either other adults or Minors should be reported.
7. Physical contact should only occur with the Minor's consent and in accordance with their needs.
8. In situations requiring personal care activities, avoid unnecessary physical contact. All such activities should be performed in the presence of a member of Staff.

Appendix 5 Reporting and list of emergency telephone numbers

Person responsible for receiving reports: [_____];

Children's Rights Ombudsman Helpline: 0 800 12 12 12;

Helpline for children and youth of the 'Dajemy Dzieciom Siłę' Foundation: 116 111;

Telephone for legal guardians and staff offering legal and psychological assistance in the event of suspected child abuse to the Child of the 'Dajemy Dzieciom Siłę' Foundation: 800 100 100;

Committee for the Protection of Children's Rights: 22 626 94 19;

Police: 997;

Emergency number: 112.