WSTIH System for the Protection of Minors

Academy of Tourism and Hotel Management in Gdańsk

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Appendix No. 1 to Rector’s Order No. 01/10/2026 of 01.10.2026
applicable from the academic year 2026/2027

The System sets out how WSTIH prevents harm to minors and responds to risks in the course of its activities. Priority is given to the safety of the minor, respect for their dignity and immediate assistance. Protection may not depend on completing a form or on the consent of the person who is the subject of the report.

1 Purpose and Scope

The Standards apply to WSTIH staff regardless of the basis of cooperation: employees, lecturers, trainers, associates, volunteers and students performing assigned tasks. The rules on safe conduct and reporting also apply to other students and participants in the University's activities.

Protection covers every person under 18 taking part in WSTIH activities: a minor student, a pupil of a partner school or of the Academic Class, or a participant in a workshop, course, visit, open day, project or event. The Standards cover activities on the premises, off the premises and online. They do not replace the regulations on the protection of adults.

Terms used in the System

- Minor – a person who has not attained the age of majority; the System also provides protection to other persons under 18.
- Harm – physical, psychological or sexual violence, neglect, exploitation, discrimination, cyberbullying and any other violation of the welfare or safety of a minor.
- Staff – persons acting on behalf of WSTIH, including those teaching classes and persons permitted to assist in activities involving minors.
- SOM Coordinator – the person appointed by the Rector to receive reports and organise intervention, support, training and monitoring of the System.
- Guardian – a parent, legal guardian or person entitled to exercise custody, as appropriate to the situation and the scope of their authority.

Legal basis of the System: the Act of 13 May 2016 on Counteracting the Threats of Sexual Offences and the Protection of Minors (consolidated text: Journal of Laws of 2026, item 110, as amended); with regard to intervention, also the Criminal Code, the Code of Criminal Procedure and the Code of Civil Procedure. The rules on data processing derive from the GDPR and national legislation. Detailed sources are listed at the end of this document.

2 Responsibilities and Receipt of Reports

Role	Tasks
Rector	Oversight, decisions on protective measures, appointment of responsible persons and ensuring notification of the authorities.
Chancellor	Resources, organisation of implementation, premises, publication and performance of administrative tasks.
SOM Coordinator and deputy	Receiving reports, safety assessment, organising intervention and the support plan, documentation, training and review.
Person authorised to carry out verification	Classification of tasks together with the organiser, checking registers and the completeness of documents before admission.
Class leader and activity organiser	Supervision, safe conditions, first response and immediate forwarding of the report.
DPO and IT administrator	Support for compliant data processing and data security, and for digital safety; no automatic access to the content of each case.

Contacts made available to participants

SOM Coordinator: **Adriana Zacharewicz**
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Deputy and contact: **Anna Łukiewska, tel. 58 52026 14 ext. 165, e-mail: kierownik.dziekanatu@wstih.pl**
Rector or channel to the Rector: **Zygmunt Sawicki, rektor@wstih.pl**
Independent channel for matters concerning the Rector: **jan.zacharewicz@wstih.pl**
Place and hours for receiving reports: **Dean's Office, during the Dean's Office opening hours**

A report may be made in person, orally, by telephone or electronically, including anonymously. No signature, evidence or completion of F06 is required. Every staff member to whom a minor discloses a risk provides assistance and passes the information on to the appropriate person.

A matter concerning the Coordinator is referred to the deputy or the Rector; a matter concerning the deputy – to the Coordinator or the Rector. The person who is the subject of a report does not handle the case and is not given access that would allow them to influence the reporting person. A report concerning the Rector is referred to the designated independent person, acting in consultation with the body competent under the Statute, and – where the grounds exist – directly to external authorities.

During every activity involving minors, a responsible person and a substitute must be available. Outside working hours, in an emergency, call 112; e-mail is not a means of obtaining immediate help.

3 Admission to Activities Involving Minors

Before assigning tasks, the organiser and the person carrying out the verification assess the actual scope of duties. Article 21 covers activities related to, among others, the education, upbringing, recreation, sports and pursuit of interests of minors, or their care. The result of the classification is recorded in F03. Neither the job title nor the form of contract determines whether the obligation applies.

1. WSTIH, as an employer or organiser, obtains information from the Register of Sexual Offenders (restricted-access register) and from the register of persons entered on the basis of a decision of the State Commission. The public register alone is not sufficient.
2. The person being admitted submits information from the National Criminal Register (KRK) covering Chapters XIX and XXV of the Criminal Code, Article 189a and Article 207 of the Criminal Code and the Act on Counteracting Drug Addiction, including corresponding offences under foreign law.
3. A person holding citizenship other than Polish additionally submits the required information from the criminal register of the country of citizenship. All citizenships held are established.
4. The person submits F04 on the countries of residence in the last 20 years other than Poland and the country of citizenship, together with documents from their registers. If a country does not issue information for the purpose of working with children, the person submits ordinary information from that country's criminal register.
5. F05 is used only where the law of the given country does not provide for the issue of the required information or no criminal register is kept there. It does not replace the Polish KRK or a document that is merely difficult, costly or time-consuming to obtain.
6. The authorised person records the results of the checks in printouts and attaches the required information and declarations to the personnel file or to separate documentation of the person being admitted. The scope of identification data corresponds to the requirements of the register and is collected through a secure channel.
7. Admission takes place after a positive assessment of the complete set of documents, training and familiarisation with the Standards. An entry in the register, a final conviction for an offence covered by Article 21 or a ban on the relevant activity precludes admission. Missing documents suspend admission. A doubtful result must be clarified before tasks begin.

Criminal record data is not requested from all students, guests or persons having only incidental contact with minors. Declaration F01 or F02 does not replace verification. No requirement of an annual KRK certificate for everyone is introduced; the need for re-verification is assessed before a new admission or a change in the scope of tasks. The family exception under Article 21(10) does not apply merely because the person knows a participant's parent, where WSTIH is the admitting entity.

4 Safe Relationships and Prohibited Conduct

Relationships between staff, students and minors

- Treat minors with respect; explain instructions and listen to their views. Take into account age, language, disability and communication needs. The rules for assessment and participation in classes must be transparent and free from pressure.
- Physical contact may arise only from a justified need for assistance, safety or instruction. Explain its purpose and, where possible, obtain the minor's consent. Respect any objection, except where necessary to protect against an immediate threat. Limit assistance with personal activities to the necessary extent and document unusual situations.
- Hold one-to-one conversations in a place that ensures confidentiality and the possibility of calling for help, with the organiser aware of the meeting place. Avoid isolated rooms and do not lock yourself in with a minor. Do not breach confidentiality by requiring a public conversation about harm.
- Communicate through official channels for purposes related to the activity. Document any exception in an emergency and inform the organiser. Do not create secret relationships or contacts that the minor is expected to hide from a safe guardian.

The following are prohibited: violence and threats; shouting intended to intimidate, name-calling and humiliation; sexual comments, contact or advances; exploiting an advantage, grades or dependence; favouritism in exchange for benefits; giving alcohol or psychoactive substances; inviting minors to a private home and unagreed private transport; recording a minor's image without authorisation; disclosing information about health or family circumstances to unauthorised persons. Involving a minor in work that is dangerous or inappropriate for their age is prohibited.

Relationships between participants

Minor and adult participants are obliged to respect the boundaries of others. Violence, exclusion, discrimination, coercion, sexual harassment, making or distributing compromising recordings, impersonation, publishing personal data and cyberbullying are prohibited. The person in charge stops the behaviour, protects those at risk and initiates the intervention procedure.

Collective responsibility is not applied. The person harmed is not forced into reconciliation, confrontation or mediation with the perpetrator, particularly in cases of sexual violence or a significant imbalance of power. A person reporting in good faith may not be punished, ridiculed or excluded from classes for the report itself.

5 Organisation of Classes, Events and Placements

Classes, visits and cooperation with schools

Before an activity involving minors, the organiser completes F11, specifying the nature of the activity, supervision, staff verification, emergency contacts, accessibility and risks. The organiser provides participants and guardians with clear rules, the place for reporting and information on when supervision begins and ends.

For school groups, the organiser agrees with the school on the supervising teachers, the division of supervision, the handover of the group, the rules for leaving the venue, collection and responding to a missing person. The organiser checks the required consents for participation or outings, as appropriate to the type of activity. An agreement may not exclude the statutory obligations of WSTIH or replace the verification of persons whom WSTIH admits to activities covered by Article 21.

A minor student follows the study programme with respect for their independence, subject to the necessary consents of the statutory representative arising from the law and the nature of the activity. The rules for collecting young children are not applied automatically to a seventeen-year-old who travels independently; the manner in which supervision ends is determined appropriately to the age and the activity.

During culinary workshops, access to knives, hot equipment, chemicals and allergens is controlled. Minors do not consume alcohol during tastings. For trips and overnight stays, supervision, transport, contacts, privacy and accommodation rules are established; staff do not share a bedroom with a minor unless there is an exceptional, documented need for care and appropriate safeguards are in place.

Placements in hospitality, gastronomy and tourism

Before the referral, the placement supervisor determines, on the basis of the actual tasks, whether the student will perform activities covered by Article 21. The mere fact of a placement in a hotel and the possibility of meeting a child do not determine the obligation. Verification is required, among others, for assigned tasks involving the care, entertainment or education of children or the organisation of their recreation.

F12 records the tasks, the admitting entity, the responsibility for its verification and confirmation that it has been completed. Each entity performs the obligations arising from its own role; an agreement may not exclude them. The WSTIH supervisor obtains confirmation that the conditions have been met before the tasks begin. The supervisor does not collect copies of the partner's KRK certificates unless this is necessary and there is an appropriate legal basis.

The student becomes familiar with the partner's standards and help channels, and reports any incident to the partner and to the WSTIH supervisor. In the event of a risk, the student stops the dangerous activity and calls for help. Referral to another place or a change of tasks requires a new safety assessment. If WSTIH itself provides hotel or tourism services or runs group accommodation, it additionally implements the relevant procedures under Article 22c(3) before starting such activity.

6 First Response to Suspected Harm

1. Ensure safety. Stop the threat, separate the minor from the person suspected of harm and place the minor in the care of a safe person. In the event of an immediate threat to life or health, serious injury or a need for urgent protection, call 112 and give first aid within the limits of your skills.
2. Listen calmly. Do not blame, do not question the account and do not promise complete secrecy. Say that help requires passing the information on to people who can provide protection. Establish only what is necessary for immediate safety; do not interrogate, do not ask leading questions and do not require the account to be repeated to several people.
3. Forward the report to the Coordinator or the appropriate substitute without delay, as a rule during the same activity. If forwarding is not possible, contact the Rector or the competent services. Do not wait for an absent person to return.
4. Record the facts in F06 as soon as safety allows: time, place, persons, observations, the minor's words and the actions taken. Separate information heard from others from your own observations and assessments. Register an anonymous report and assess it on the basis of its content; missing details are not a reason for automatic rejection.
5. Secure available evidence against loss. Do not conduct your own investigation or a physical examination. Do not copy or distribute sexual material involving minors. Record the location of the material, the time and the available data; pass the information to the Police and follow their instructions.
6. The Coordinator assesses the need to call the services, contact a safe guardian, notify the authorities and draw up a support plan. For non-urgent matters, the Coordinator organises the first actions no later than the next working day after receiving the report. This is an internal deadline and does not postpone the obligation of immediate notification where required by law.

When the threat comes from different persons

Staff member or adult student: contact with the minor is restricted for the duration of the risk assessment; the Rector or an authorised person decides on temporary removal from specific tasks in accordance with the law. This is a protective measure, not a determination of guilt. Minor participant: both parties are protected and support is organised; the age of the suspected person does not justify omitting notification of the authorities where there are grounds for it.

Parent or guardian: the child and the details of the report are not handed over to that person if this could increase the risk. The manner of contact and further protection are agreed with the Police or the competent social welfare services. Person from outside WSTIH: the participant and the place are secured and the information is passed to the competent services. Assistance does not depend on the place where the harm occurred.

7 Notifications and Support Plan

External authorities

The Coordinator prepares the notification; the Rector or a person authorised by the Rector ensures that it is submitted and that confirmation is retained. If the matter concerns that person, the action is taken by the independent person designated in the System. Notification may not be made conditional on the completion of internal proceedings or on a parent's consent.

- Police or public prosecutor – where there is a reasonable suspicion of an offence against a minor. WSTIH adopts an internal rule of forwarding such suspicions without delay. Article 304 § 1 of the Code of Criminal Procedure sets out the civic duty to notify; the obligation under § 2 is not automatically attributed to a non-public university.
- Article 240 § 1 of the Criminal Code – where there is credible information about the acts listed in that provision, including offences under Article 197 § 3–5, Article 198 or Article 200 of the Criminal Code, the law enforcement authority must be notified immediately. Merely informing a superior is not sufficient if the authority has not been notified. Staff are not required to determine the legal classification of the offence themselves before calling for help.
- Family court – where known events justify proceedings ex officio, in particular where the child's welfare is at risk, or in cases of neglect or inadequate care; the basis is Article 572 of the Code of Civil Procedure. Jurisdiction is determined according to the minor's situation. Information on the initiation of proceedings may be requested.
- Social welfare services or Police – where domestic violence is suspected and protection is needed. WSTIH does not assume that university status alone confers the right to initiate the Blue Card procedure. Information is passed to the authorised entity; any action by a person holding separate statutory powers is taken within the limits of those powers.

Templates F13 and F14 are an aid to drafting the letter. An urgent notification may be made orally or by telephone; the formalities are completed later. The documentation records the recipient, the date and the manner of notification. Everyone retains the right to report directly to the authorities.

Support after disclosure of harm

The Coordinator, in consultation with the minor and a safe guardian, draws up F07 without undue delay. The plan specifies the contact person, protective measures, safe participation in classes, adjustments, possible psychological support and the date for evaluating its effects. It does not require waiting for the outcome of criminal proceedings. Specialist help is provided through the appropriate institutions; no services are promised that WSTIH cannot actually provide.

Disability and special needs are taken into account: alternative communication, interpreter support, an accessible place for conversation, breaks and reduced stimuli. Communication difficulties are not interpreted as a lack of credibility. The minor may name a safe support person. The first review of the plan takes place, as a rule, within 14 days; a situation of risk requires an earlier check.

8 Digital Safety, Privacy and Image

Internet, devices and online classes

The IT administrator secures the devices and network made available to minors: updates, protection against malware, restrictions on access to harmful content and handling of reports. Before an activity, the organiser checks that secure access is available; if it cannot be secured, use is limited to supervised tasks or access is not provided.

The class leader selects materials appropriate to the age and educational purpose. It is prohibited to share content that is pornographic or that incites violence, hatred, self-harm or dangerous behaviour. Personal devices may not be used for harassment, covert recording or distribution of data. Staff do not search a private phone without an appropriate legal basis.

Online classes are conducted using approved accounts and tools, with control over participants, permissions, chat and screen sharing. Classes are not recorded by default. The organiser determines in advance the purpose and legal basis of any recording and the rules of access. Materials identifying minors or concerning interventions are not entered into public AI tools, private cloud services or unapproved applications.

In cases of cyberbullying, the class leader stops the distribution, restricts access and initiates the intervention procedure. IT secures the available logs to the extent necessary and in accordance with the law. The address, date and context of the report are retained; no unnecessary copies of harmful content are made. Digital threats are not treated as less important than incidents on the premises.

Privacy and publication of image

A minor's image is recorded and distributed only on an appropriate legal basis and once the conditions applicable to the purpose of publication have been met. Where the basis is consent, it must be separate, voluntary, specific and documented, and given by the appropriate person; the minor's opinion and objection are also taken into account. Refusal of marketing consent may not restrict participation in classes.

No data is published that would make it easy to determine a child's whereabouts, nor any information about harm to the child, their health or family situation. A photographer is not given unrestricted, unsupervised access to minors. Private devices are not used to create promotional materials without approved rules for their secure transfer and deletion. Exceptions to the requirement of permission to distribute an image are assessed individually; a public event alone does not permit unrestricted publication of portraits of children.

Staff keep information about minors confidential. They share it only with authorised persons to the extent necessary for protection, or with authorities acting on a legal basis. Confidentiality may not be used to conceal harm or to block access to help.

9 Documentation and Storage of Information

The Coordinator assigns a case number and keeps F08. Form F06 covers the report, safety assessment, actions, notifications and the outcome of the review. F07 and the necessary proof of forwarding the case are added to the file. The register contains a limited scope of data; the identification of persons is kept in separate files. Detailed accounts or diagnoses are not entered in generally accessible spreadsheets.

Paper documents are stored in a lockable place. Electronic documents are stored in an approved repository with individual permissions, authentication and access logging. Access is granted only to persons authorised in accordance with their task. Staff verification documentation is kept separate from intervention files. It is not stored in private accounts or in general student folders.

Retention rules adopted by WSTIH

Type of documentation	Retention rule
Personnel files and Article 21 documents	In personnel files for the period required by the relevant regulations on employee documentation; without separate indefinite duplication.
Verification of a person outside an employment relationship	For the duration of the tasks covered by the verification, then, as a rule, up to 3 years from the end of the year in which they ended, with an annual assessment of the need for further retention.
Intervention files and incident register	As a rule, up to 5 years from the end of the year in which the case was closed; the annual assessment may justify earlier deletion of unnecessary data or anonymisation.
Case or claim still pending	Information necessary in pending proceedings or for the protection of rights is not deleted. Further retention is justified individually and a date for the next review is set.
Training, system assessments and declarations	For the period of validity of the given version and then 3 years; documents forming part of personnel files in accordance with their applicable period.

The 3- and 5-year periods are internal WSTIH rules, not statutory deadlines under the Act on the Protection of Minors. Before adopting them, the controller, with the participation of the DPO, verifies their adequacy in relation to risk, claims, archiving obligations and the current retention policy. Retention is not extended automatically merely because the participant is a minor; nor is data deleted that is necessary for the current protection of their rights.

The Rector approves an extension of the period on the basis of a documented need. Deletion or anonymisation is recorded without retaining the content of the deleted case. Where cooperation is not taken up, criminal record documents are not stored without a specified purpose and legal basis. Data subjects are provided with the appropriate information under Article 13 or 14 of the GDPR and their rights are exercised within the limits of the law; general consent is not used as the basis for statutory verification.

10 Training, Publication and System Assessment

The Coordinator and the deputy must be prepared to recognise harm, respond in the first instance, notify the authorities, conduct a safe conversation and handle documentation and data protection. The Rector ensures the necessary training before entrusting them with their role; the Coordinator does not replace a psychologist or a law enforcement authority.

The Coordinator trains staff before they begin tasks involving minors and after any significant change to the Standards. The training includes examples from WSTIH activities, the role of Article 21, reporting channels, emergencies, protection against retaliation and the needs of persons with disabilities. F09 documents the date, programme, trainer and participants. F01 confirms familiarisation by staff, F02 – by students.

The full and short versions are published on the WSTIH website and displayed in a visible place on the premises. They are available at the Dean's Office and from the activity organiser. Minors and guardians receive the information before participation begins. An explanation in plain language, communication support and an accessible format are provided where a participant needs them. The signature of a minor or a parent is not a condition for being covered by protection.

The Coordinator checks the contacts and the practical functioning of the System every year. At least once every two years, the Coordinator carries out a full assessment of compliance with the law and with WSTIH's needs, taking into account the views of minors, staff and partners. The assessment is drawn up in writing in F10. After a serious incident or a change in the law or in the organisation, a review is carried out without delay. The Rector adopts changes, and the Chancellor ensures that publications are updated and outdated versions are withdrawn.

Breaches of the Standards may lead to appropriate employment, disciplinary or contractual measures, or measures concerning participation in an activity, within the limits of the applicable regulations. Internal proceedings do not replace the protection of the minor or external notifications.

Forms and related documents

Appendix No. 2 contains the short version. Appendix No. 3 contains F01–F14: staff and student declarations, verification form, declarations concerning foreign countries, intervention form, support plan, incident register, training register, assessment report, safeguarding of an activity and of a placement, and notification templates. The implementation checklist is an organisational tool.

Legal and supporting sources

Act on the Protection of Minors, Articles 21 and 22b–22c: https://eli.gov.pl/eli/DU/2026/110/ogl
Criminal Code, Article 240: https://eli.gov.pl/eli/DU/2025/383/ogl
Code of Criminal Procedure, Article 304: https://eli.gov.pl/eli/DU/2026/490/ogl
Code of Civil Procedure, Article 572: https://eli.gov.pl/eli/DU/2026/468/ogl
GDPR, Regulation (EU) 2016/679; Act of 10 May 2018 on the Protection of Personal Data; Article 81 of the Act of 4 February 1994 on Copyright and Related Rights.
UODO (Personal Data Protection Office), guidance on limiting scope and retention: https://uodo.gov.pl/pl/138/3377
RPD (Ombudsman for Children), Children's Helpline: https://brpd.gov.pl/telefon-zaufania-rzecznika-praw-dziecka-800-12-12-12/