



Standards for the Protection of Minors



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1 Purpose

These Standards for the Protection of Minors have been developed in performance of the legal obligation introduced by the Polish Law of 13 May 2016 on Combating Sex Crime and on the Protection of Minors (Journal of Laws of 2024, item 506) with respect to all entities carrying out educational activities.

The overriding principle for all of the actions taken by the Personnel of Andea is to act for the good of Minors and in their best interest. Every member of the Personnel is required to treat Minors with respect, consider their needs, and oppose any and all forms of violence and abuse towards a Minor. To this end, the Personnel of Andea shall act in accordance with the applicable legal regulations and within their competences.

2 Scope

This document applies to all members of the Personnel, the Minors completing vocational and/or pupil internships at Andea, and the Legal Guardians of these Minors. These Standards for the Protection of Minors are generally available at Andea's website: www.andea.com. Additionally, the members of the Personnel and Minors can access this document in the Guidelines & Policies folder.

3 Definitions

1. "Employer/Andea" shall mean the Andea Group, i.e., ANDEA sp. z o.o. of Kraków and the companies based in Poland in which it holds a majority of the shares, both directly and indirectly. The current list of the members of the Group is available at <https://www.andea.com/company-entities/> and in the "Guidelines & Policies" folder that is available to all members of the Group's Personnel.
2. "Personnel" shall mean the managers, employees (persons rendering work for the Employer under an employment relationship, hired for a fixed term or under an open-ended contract), contractors, and posted employees, both those working at the Employer's offices and those working remotely.
3. "Workplace" shall mean the location where the members of the Personnel carry out work for the Employer, currently located in Kraków at ul. Kapelanka 42B.
4. "Principal" shall mean the principal of the school attended by a pupil who completes vocational learning or a pupil internship at the Employer's in accordance with legal regulations on education.
5. "Minor" shall mean every person who is under the age of 18 or a pupil of a school that offers learning a trade under an agreement for learning a trade or an employment contract/civil law agreement in order to vocationally prepare the pupil or that offers pupil

internships, as referred to in Article 121a(1) of the Polish Law on Education, under pupil internship agreements.

6. “Legal Guardian” shall mean a statutory representative of a Minor: a parent¹ or a guardian,² a foster parent,³ or a temporary guardian⁴ (i.e., a person authorized to represent a Minor who is Ukrainian and stays in Poland without being under the care of an adult).
7. “Parental Consent” shall mean the consent of at least one of the Minor’s parents; if the parents do not reach an agreement, they are to be informed that the case will have to be settled by a family court. “Guardian’s Consent,” “Foster Parent’s Consent,” and “Temporary Guardian’s Consent” shall be defined accordingly.
8. “Vocational/Pupil Internship Coordinator” shall mean the person appointed by the Employer to manage vocational or pupil internships.
9. “Vocational Learning Instructor” – the Employer or a person employed by the Employer who holds the necessary professional and pedagogical qualifications for organizing vocational learning at the Workplace.
10. “Harming a Minor” shall mean any behavior towards a Minor that constitutes a violation of legal regulations. In addition, harm shall also mean neglect (intentional or not), an action, or an omission and any outcome thereof resulting in a violation of the rights, including personal rights, and freedoms of the Minor and a disruption of their development.

The fundamental forms of causing harm are as follows:

- 1) physical violence – intentionally causing bodily injury, causing pain or threatening to cause a bodily injury; physical violence can result in fractures, bruises, cut wounds, burns, and internal injuries;
- 2) emotional abuse – repeated humiliation, degradation, and ridiculing of a Minor, drawing a Minor into a conflict between adults, manipulating a Minor, lack of appropriate support, care, and love, setting a Minor requirements and expectations the Minor is unable to meet; the intention is to violate personal dignity;
- 3) sexual abuse – any behavior that leads to sexual satisfaction at the expense of a Minor; sexual abuse concerns behaviors related to physical contact and behaviors that do not involve physical contact (e.g. showing pornographic materials to a Minor, voyeurism, exhibitionism);
- 4) neglect – failure to satisfy the fundamental material and emotional needs of a Minor by a parent or Legal Guardian; failure to provide a Minor with appropriate food, clothing, shelter, medical care, and safety; lack of supervision over a Minor’s compulsory school

¹ As defined in Article 98 of the Polish Family and Guardianship Code (Journal of Laws of 2023, item 2809), hereinafter referred to as the “Family and Guardianship Code.”

² As defined in Article 155 of the Family and Guardianship Code.

³ As defined in Article 1121 of the Family and Guardianship Code.

⁴ As defined in Article 25 of the Polish Law of 12 March 2022 on Assistance Provided to Ukrainian Citizens in Connection with the Armed Conflict in Ukraine (Journal of Laws of 2024, item 167, as amended).

attendance;

- 5) bullying – various forms of abuse from peers. This concerns direct and indirect actions as well as actions taken through communication technologies (e.g. online or through a mobile phone). Bullying occurs when an action is intended to cause distress or harm (intentionality), is regular in nature (repeatability), and the victim is weaker than the perpetrator or a group of perpetrators.
11. “Online Safety Coordinator” shall mean the member of the Personnel appointed by the Employer as the person responsible for ensuring safe conditions for the Minors to use ICT networks, including the Internet, at the Workplace. If the member of the Personnel appointed by the Employer is absent, they shall be substituted by another person appointed to fill in for them.
12. “Person Responsible for the Standards for the Protection of Minors” shall mean the Employer or a member of the Personnel appointed by the Employer, exercising supervision over proper application at the Employer’s of the Standards for the Protection of Minors and making sure that the Standards are up-to-date. If the member of the Personnel appointed by the Employer is absent, they shall be substituted by another person appointed to fill in for them.
13. “Person Responsible for Receiving Reports” shall mean the Employer or a member of the Personnel appointed by the Employer, responsible for receiving reports of events posing a threat to a Minor. If the member of the Personnel appointed by the Employer is absent, they shall be substituted by another person appointed to fill in for them.
14. “Person Responsible for Interventions” shall mean the President of the Management Board as the person responsible for intervening with the relevant authorities or institutions. If the President of the Management Board is absent, they shall be substituted by a Member of the Management Board.
15. “Person Responsible for Providing Support to Minors” shall mean a member of the Personnel appointed by the Employer to develop a plan of supporting the Minor once it has been identified that the Minor was harmed and to monitor the implementation of the plan. If the member of the Personnel appointed by the Employer is absent, they shall be substituted by another person appointed to fill in for them.
16. “Register of Interventions” shall mean the documentation that contains a register of the disclosed or reported incidents or events posing a threat to the well-being of a Minor, containing the following:
 - 1) a report specifying the reporting person;
 - 2) the details of the person(s) suspected of causing harm (the Minor’s Legal Guardian, a member of the Personnel, another Minor, another person);
 - 3) the type of intervention taken;
 - 4) the date of the intervention;
 - 5) the documents produced during the intervention (including memos, intervention sheets, copies of notifications/requests sent to the relevant services/school).

17. "Minor's Personal Data" shall mean the minimum scope of information allowing for identifying the Minor.

4 Responsible persons

4.1 Contact details of the persons responsible for specific areas and of institutions that provide assistance

1. The Employer has appointed the following persons to perform the functions specified in these Standards:

#	Area of responsibility	Contact details
1	Online Safety Coordinator	kbwi@andea.com
2	Person Responsible for the Standards for the Protection of Minors	som@andea.com
3	Person Responsible for Receiving Reports	somzgloszenia@andea.com
4	Person Responsible for Interventions	sominterwencje@andea.com
5	Person Responsible for Providing Support to Minors	somwsparcie@andea.com

2. In terms of protection of Minors, the Employer shall closely cooperate with the schools at which Minors complete their vocational training.
3. In terms of the actions related to the protection of Minors, the Employer may cooperate with:

- 1) health care facilities;
 - 2) Social Welfare Centers;⁵
 - 3) psychological/pedagogical counseling centers;
 - 4) the District Family Assistance Center;
 - 5) the Police;
 - 6) the District Court.
4. If necessary, the Employer informs the Minors staying at the Workplace about the assistance provided by:
- 1) the Ombudsman;
 - 2) the Children's Ombudsman, including in the form of a trusted phone line: 800 12 12 12;
 - 3) the trusted phone line for children and the youth: 116 111;
- and, if necessary, engages in cooperation with these entities.

5 Identifying and responding to factors related to harming Minors

5.1 Preventive actions

1. The Employer shall take actions in order to prevent harm to Minors, including but not limited to:
 - 1) specifying the principles of responding to risk factors and symptoms of harm being done to Minors;
 - 2) specifying the principles of safe recruitment of the members of the Personnel;
 - 3) ensuring that the members of the Personnel who perform the function of a Vocational/Pupil Internship Coordinator or a Vocational Learning Instructor are properly prepared;
 - 4) specifying the responsibilities of the members of the Personnel;
 - 5) specifying the principles of safe relations between the members of the Personnel and Minors and among Minors themselves.
2. The members of the Personnel acting as a Vocational/Pupil Internship Coordinator and a Vocational Learning Instructor shall have at least fundamental knowledge of risk factors and symptoms of harm being done to Minors and, as part of their duties, shall pay attention if those factors or symptoms are present.

⁵ The relevant Social Welfare Center is determined based on the Minor's address of residence.

3. If risk factors are identified, the Vocational/Pupil Internship Coordinator or the Vocational Learning Instructor shall reach out to the Minor's Legal Guardians, providing information about the available forms of support and motivating them to look for assistance from other institutions/entities that act for the good of Minors. All of the steps taken should be documented in the manner adopted at the Employer's.

5.2 Principles of recruiting the members of the Personnel

1. Prior to appointing a member of the Personnel as a Vocational/Pupil Internship Coordinator or a Vocational Learning Coordinator, the Employer shall exercise utmost diligence in terms of preparing that person to perform this function and to work with Minors. The Employer shall also verify if that person is entered into the Register of Sexual Offenders (the limited access register and the register of persons with respect to which the State Commission for Preventing Sexual Abuse of Minors Under the Age of 15 has issued a decision on entering them into the Register)⁶. The printout from the Register should be kept in the employee's file or in another documentation concerning the member of the Personnel.
2. Prior to being appointed to perform the function referred to in section 5.2.1, the person referred to in section 5.2.1 shall provide the Employer with information from the National Criminal Register with respect to the criminal offenses specified in Chapter XIX (criminal offenses against life and health) and Chapter XXV (criminal offenses against sexual freedom and decency) of the Polish Criminal Code, in Articles 189a and 207 of the Polish Criminal Code, and in the Polish Law of 29 July 2005 on Combating Addiction to Narcotics (Journal. of Laws of 2023, item 1939) or with respect to criminal offenses specified in foreign legal regulations that correspond to the above criminal offenses.⁷
3. If the person referred to in section 5.2.1 is a citizen of a country other than Poland, they shall additionally provide the Employer with information from the criminal register of their country of citizenship, which they shall obtain for the purpose of professional or volunteering work that involves contacts with Minors.
4. The person referred to in section 5.2.1 shall make to the Employer a representation concerning the country or countries in which they resided in the last 20 years, if different than Poland and their country of citizenship, and shall provide the Employer with information from foreign criminal registers, which they shall obtain for the purpose of professional or volunteering work that involves contacts with Minors.
5. If the legal regulations of the country referred to in section 5.2.4 or in section 5.2.5 does not provide for issuing information for the purpose of professional or volunteering work

⁶ The Register is available at <https://rps.ms.gov.pl/pl-PL/Public/>

⁷ Additionally, in accordance with Article 120(3a) of the Polish Law of 14 December 2016 on Education, a person providing vocational training is required to submit a certificate of no criminal record.

that involves contacts with Minors, information from that country's criminal register shall be provided instead.

6. If the legal regulations of the country from which the information referred to in sections 5.2.4 and 5.2.5 is required do not provide for issuing such information or if that country does not have a criminal register, the person referred to in section 5.2.1 shall make a representation in this respect, stating that they have not been convicted, in that country, of a criminal offense corresponding to the criminal offenses specified in Chapters XIX and XXV of the Polish Criminal Code, in Articles 189a and 207 of the Polish Criminal Code, and in the Polish Law of 29 July 2005 on Combating Narcotics Addiction, that no ruling has been issued with respect to them stating that they have committed such criminal offenses, and that they are not prohibited, under a ruling of a court or another authority or under statutory regulations, from holding any or specific positions, performing any or specific professions, or carrying out any or specific activities related to upbringing, education, rest, medical treatment, psychological counseling, spiritual development, sport, or other hobbies of Minors or related to exercising care over minors.
7. The representations referred to in sections 5.2.4 and 5.2.6 are made with criminal liability for making a false statement applying. The person making the representation shall include in it the following sentence: "I am aware of criminal liability for making a false statement." This replaces a warning from a public authority concerning criminal liability for making a false statement.
8. A person performing the function of a Vocational/Pupil Internship Coordinator or a Vocational Learning Instructor shall make the following representations:
 - 1) a representation on having read and understood and undertaking to comply with the Standards for the Protection of Minors in force at the Andea Group (Appendix No. 10);
 - 2) a representation regarding that person's countries of residence in the last 20 years, if different than Poland (Appendix No. 1A);
 - 3) a representation on having no criminal record and a representation that no criminal register is maintained and no information concerning criminal record is issued in a country other than Poland (if, for important reasons, a certificate of no criminal record based on a national criminal register cannot be provided) (Appendix No. 2).
9. The representations shall be added to the employee's file, and if no file is maintained, attached to a civil law agreement.
10. Refusal to sign any of the documents listed in section 5.4.8 makes it impossible for establishing any legal relationship with that person (execution of an employment contract/cooperation agreement).

5.3 Principles of safe relations between the Employer's Personnel and Minors

1. The Personnel shall know and follow the principles of safe relations between the Personnel and Minors that are in force at the Employer's.
2. Knowledge and acceptance of these principles shall be confirmed by each of the members of the Personnel.
3. The overriding principle for all of the actions taken by each of the members of the Personnel shall be acting for the good of Minors and in their best interest.
4. The members of the Personnel shall treat Minors with respect, considering their dignity, needs, and right to privacy.
5. Any form of violence or abuse towards a Minor is unacceptable.
6. Entering into any sexual or intimate relations with a Minor is unacceptable.
7. Recording the image of a Minor (e.g. filming, recording the voice, taking photos) for the private purposes of a member of the Personnel is unacceptable.
8. Every form of contact with a Minor shall be overt and a result of carrying out official tasks and duties.
9. It is unacceptable to maintain contacts based on providing financial or material gratifications, on making use of physical advantage, or on a relationship of power over a Minor or a Minor's dependence, where the intention is the satisfaction or the fulfillment of needs of a member of the Personnel.
10. It should be ensured that every message, action, or activity addressed to a Minor is appropriate to the situation, the Minor's level of development, and the Minor's mental and physical capabilities, as well as safe, justified, and not resulting in unequal treatment of the Minor versus other Minors, including in the form of favoritizing that Minor.
11. The general principles of safe relations between the members of the Personnel and Minors shall apply to all members of the Personnel and to all persons having contacts with Minors at the Employer's if such contacts take place in the Workplace.
12. A detailed description of the principles of safe relations between the Personnel of the Andea Group and Minors constitutes Appendix No. 3.

5.4 Principles of safe relations among Minors

1. The Vocational/Pupil Internship Coordinator and the Vocational Learning Instructor shall know and monitor compliance with the principles of safe relations among Minors that are in force at the Employer's.

2. The Minors who are completing vocational learning or a pupil internship at the Employer's shall know and comply with the principles of safe relations among Minors.

5.5 Minors with special educational needs, including Minors with disabilities⁸

1. If the Employer carries out vocational learning or pupil internships that involve Minors with special educational needs, including Minors with disabilities and Minors who are not socially adapted or at risk of becoming socially unadapted, the Employer shall adjust these Standards in accordance with the recommendations from the Principal, which shall be based on decisions issued by and evaluations prepared by psychological/pedagogical counseling centers, including specialist ones, and by an occupational medicine physician.

5.6 Dissemination of knowledge about the Standards for the Protection of Minors

1. Members of the Personnel shall complete at least basic training in terms of protection of Minors.
2. The above dissemination activities shall concern in particular:
 - 1) these Standards for the Protection of Minors (the applicable principles and procedures);
 - 2) development of skills in terms of identifying risk factors and symptoms of harm being done to Minors;
 - 3) combating violence and abuse, including by means of intervening in the event of suspecting that harm is being done to a Minor.
3. It shall be ensured that Minors know that they have the right and option to talk to the person responsible for their protection⁹ or to another trusted member of the Personnel who will take actions in order to support them, respecting their privacy, if:
 - 1) they have a problem, fear or suffer violence or abuse, including a behavior that violates the principles of safe relations from a member of the Personnel, another Minor, a Legal Guardian of a Minor, another close person, or any other person;
 - 2) they have witnessed an inappropriate, incomprehensible, or unclear behavior, including a behavior specified in the principles of safe relations between a Minor and a member

⁸ Article 68(1)(10) of the Polish Law on Education and the Regulation of the Polish Minister of National Education of 9 August 2017 regarding the Conditions for Organizing the Education and Upbringing of and Care Over Children and Youth with Disabilities or Social Adaptation Deficits or At Risk of a Social Adaptation Deficit (Journal of Laws of 2020, item 1309).

⁹ I.e., the Person Responsible for Receiving Reports in accordance with section 5.7.4.

of the Personnel, another Minor, a Legal Guardian of a Minor, another close person, or any person.

5.7 Obligations of the persons responsible for the introduction and implementation of the Standards for the Protection of Minors

1. Obligations of the Employer:
 - 1) making sure that the Workplace is a safe environment;
 - 2) appointing a person/persons responsible for:
 - a) the Standards for the Protection of Minors;
 - b) online safety;
 - c) receiving reports;
 - d) carrying out interventions;
 - e) providing Minors with support;
 - 3) delegating tasks and responsibilities related to the implementation of the Standards for the Protection of Minors.
2. The obligations of the Person Responsible for the Standards for the Protection of Minors shall include:
 - 1) making sure that the Standards for the Protection of Minors are published on the Employer's website and available at the Workplace;
 - 2) preparing the Personnel to apply the Standards for the Protection of Minors;
 - 3) coordinating educational activities;
 - 4) cooperating with other persons appointed to implement the Standards for the Protection of Minors;
 - 5) maintaining a register of the members of the Personnel who have read and understood the Standards for the Protection of Minors prior to commencing work or after an update to the Standards;
 - 6) monitoring the implementation of the guidelines contained in the Standards for the Protection of Minors, planning evaluations of the Standards that will involve the Employer, the Personnel, and Minors and updating those plans.
3. The Online Safety Coordinator shall ensure:
 - 1) guidelines in terms of safe use of the Internet, by means of:
 - a) developing internal regulations concerning safe use of ICT networks, including the Internet (the "Principles of Safe Internet Use"), which should be available in a physical form and on the WIKI Andea platform;
 - b) presenting the Principles of Safe Internet Use to Minors and the members of the Personnel and informing about all updates of the Principles;

- 2) terms of safe use of the Internet on the Employer's devices, by means of:
 - a) determining the scope of blocking access to content that is illegal, harmful, and inappropriate to the age of the user;
 - b) installing and regularly updating software that blocks access to content that is illegal, harmful, and inappropriate to the age of Minors, as well as updating the operating systems of devices;
 - c) evaluating whether the security software and the software blocking websites, as well as the scope of blocking, are appropriate to the needs of Minors and the changing Internet environment.
4. The Person Responsible for Receiving Reports shall:
 - 1) receive reports of occurrence of a risk factor concerning the well-being of a Minor;
 - 2) receive reports of symptoms of Harming of a Minor or actual Harming of a Minor as well as reports of disclosed or reported incidents or events threatening the well-being of a Minor;
 - 3) forward reports to the Person Responsible for Interventions (the Employer) and the Principal (if the Minor attends a school) or, if the life or health of the Minor is in direct danger, immediately inform the Police and the Minor's Legal Guardians (unless they are the source of the danger).
5. The Person Responsible for Interventions shall:
 - 1) initiate interventions in accordance with the procedures described below and monitor cooperation with the school;
 - 2) document reports, verify them, and inform about the conclusions made, including by means of maintaining the Register of Interventions. The Register of Interventions shall be stored in a properly secured location with access provided to the person responsible for maintaining the Register of Interventions and the Members of the Management Board.
6. The Person Responsible for Providing Support to Minors shall:
 - 1) cooperate, including with school administration, the Minors' Legal Guardians, and other entities in terms of developing plans of supporting Minors,
 - 2) support Minors by means of:
 - a) making sure that Minors are safe, e.g. by isolating them from those who caused harm to them;
 - b) ensuring the well-being of Minors and the satisfaction of their current needs (including fundamental physiological needs);
 - c) showing kindness and trust to Minors as well as interest in how they feel;
 - 3) monitor, in cooperation with the administration of the Minor's school, the support provided to the Minor; if necessary, refer the Minor and/or the Minor's Legal Guardians

to institutions that offer counseling, including psychological counseling, addiction therapy, interventions for perpetrators of violence, support groups, and educational skills workshops (these are e.g. psychological/pedagogical counseling centers, psychological and psychotherapeutic care centers for children and the youth, social welfare centers, and local NGOs).

6 Intervention procedures

6.1 Intervention procedures in the case of suspected harm to a Minor

1. Threats to the safety of Minors may have various forms and may exist in various channels of contact and communication.
2. For the purposes of this document, the following types of threats to the safety of Minors are recognized:
 - 1) suspicion of a criminal offense to the detriment of a Minor (e.g. sexual abuse, other forms of abuse);
 - 2) suspicion of another form of causing harm that is not a criminal offense (e.g. domestic violence that does not classify as a criminal offense, shouting, humiliation, ridicule, pressure);
 - 3) suspicion of neglecting a Minor's necessities (e.g. those related to nutrition, hygiene, or health).
3. For the purposes of this document, intervention procedures have been developed in case of suspected actions to the detriment of a Minor taken by:
 - 1) adults (members of the Personnel, third parties);
 - 2) the Minor's Legal Guardians;
 - 3) another Minor.
4. The intervention procedures are formulated in such a way as to support the Personnel in carrying out the legal and social obligation to respond in the event of a suspicion of harm being done to a Minor.
5. The purpose of an intervention is to stop the harm that is being done to the Minor and make the Minor safe.
6. In the event of doubt as to how to proceed, the Person Responsible for Interventions may contact the specialists from the Dajemy Dzieciom Siłę Foundation at 800 100 100.
7. It is recommended to inform the school attended by the Minor who is completing vocational education or a pupil internship at the Workplace about the intervention.
8. It should be remembered that in the event of a suspicion of sexual abuse of a Minor below the age of 15, there is a legal obligation to report this to the Police or the Prosecution

Office. Failure to do so entails possible imprisonment for up to 3 years. In the case of other criminal offenses, the social obligation to report them rests with everyone.

9. If the Personnel suspects that a Minor is being harmed or if a Minor or a Minor's Legal Guardian reports such a situation, a member of the Personnel shall produce an official memo and send it to the Person Responsible for Interventions.
10. The Person Responsible for Interventions shall immediately receive the report and commence the appropriate actions.
11. If harm is reported as being done by the Person Responsible for Interventions, the intervention shall be carried out by another Member of the Management Board.
12. Specialists, including but not limited to psychologists and counselors working at the school attended by the Minor who is completing vocational learning or a pupil internship at the Workplace, may be permitted to participate in the intervention.
13. An intervention sheet shall be produced with respect to the course of each intervention; the specimen of an intervention sheet constitutes Appendix No. 5 to these Standards. The intervention sheet shall be included in the Register of Interventions maintained at the Workplace.
14. All of the persons who, in connection with their official duties, learned about the Harming of a Minor or learned related information shall maintain confidentiality, except for the information shared with the authorized institutions as part of an intervention.
15. If the suspected threat to the safety of a Minor is reported by the Minor's Legal Guardians and the suspicion does not check out, this should be notified to the Minor's Legal Guardians in writing.
16. If it is suspected that a Minor's life is at risk or a Minor may suffer serious injuries, the relevant services should be immediately informed (the Police, ambulance emergency service, social welfare center) by calling 112 or 998 (emergency ambulance service). The services shall be informed by the member of the Personnel who was first to learn about the threat; this person shall subsequently produce an official memo and send it to the Person Responsible for Interventions, who will be responsible for the further course of the intervention, in accordance with the procedures described in these Standards.

6.2 Suspicion of harm being done to a Minor by a member of the Personnel

1. If a suspected case of harming a Minor is reported, the Person Responsible for Interventions shall interview the Minor and the other persons who could have knowledge of the incident, including the Minor's Legal Guardians.
2. The Person Responsible for Interventions shall attempt to determine the course of the incident. Conclusions are recorded in the intervention sheet. During the meeting, the Minor's Legal Guardians are provided with information about the incident, the intervention

(if carried out), and the option to take advantage of specialist support, including the support offered by other organizations and services.

3. The Person Responsible for Interventions shall organize a meeting with the member of the Personnel the report concerns, in order to clarify the situation. Conclusions are recorded in the intervention sheet.
4. Until the incident has been clarified, the member of the Personnel suspected of Harming a Minor in a form that constitutes a criminal offense under Polish legal regulations shall be asked not to engage in any forms of contact not only with the victim, but also with other Minors.
5. If a criminal offense is suspected, the Employer shall report this to the Police or the Prosecution Office. In the other cases, the Employer shall take disciplinary actions in accordance with legal regulations and the principles in force at the Workplace.
6. If a member of the Personnel has Harmed a Minor in a form that does not constitute a criminal offense (e.g. shouting, exclusion, humiliation), the Person Responsible for Interventions should investigate all of the circumstances of the incident, including but not limited to hearing the person suspected of Harming a Minor and other witnesses of the incident. If discrimination or a violation of the dignity of a Minor has taken place, the implementation of the relevant disciplinary procedures, including termination of the contract with the person guilty of Harming, should be considered.

6.3 Suspicion of harm being done to a Minor by the Minor's Legal Guardian

1. If the Harming of a Minor by the Minor's Legal Guardian is reported, the Person Responsible for Interventions shall interview the Minor. They should also interview other persons who have or may have knowledge of the incident and the Minor's personal situation. In this respect, they can cooperate with the personnel of the school attended by the Minor. The Person Responsible for Interventions shall attempt to determine the course of the incident. Conclusions are recorded in the intervention sheet.
2. If a criminal offense has been perpetrated towards a Minor, the Person Responsible for Interventions shall produce a notification of a possible criminal offense and shall submit it to the relevant unit of the Police or the Prosecution Office.
3. If a Minor is being harmed by their Legal Guardians or other members of the household in a form that does not constitute a criminal offense:
 - 1) if the behavior towards the Minor has the features of domestic violence,¹⁰ the Social Welfare Center having jurisdiction over the place of residence of the Minor shall be notified, so that it may initiate the Blue Card procedure;

¹⁰ The definition of domestic violence is contained in Article 2(1) of the Polish Law of 29 July 2005 on Combating Domestic Violence (Journal of Laws of 2024, item 424, as amended).

- 2) if the behavior towards the Minor does not have the features of domestic violence, but the Minor suffers neglect or family relations are otherwise incorrect (e.g. the parents are incapable of raising a child), the Person Responsible for Interventions should notify the Principal or other authorized entities that may request the family court having jurisdiction over the place of residence of the child to verify the family's situation.
4. The Person Responsible for Interventions shall organize a meeting with an adult family member who is not the person harming the Minor and shall provide them with information about the incident, the intervention (if carried out), and the need/option to take advantage of specialist support, including the support provided by other organizations or services.

6.4 Suspicion of harm being done to a Minor by another Minor

1. If it is suspected that a Minor is being harmed by another Minor staying at the Workplace, the Person Responsible for Interventions shall interview the Minor suspected of harming another Minor as well as the Legal Guardians of that Minor; separately, the Person Responsible for Interventions shall interview the Minor being harmed and their Legal Guardians. Furthermore, the Person Responsible for Interventions shall talk to other persons who have knowledge of the incident. During the interviews, attempts should be made to determine the course of the incident. Conclusions are recorded in the intervention sheet. Separate intervention sheets shall be produced for the Minor doing harm and the Minor being harmed.
2. It is recommended to get support from the school or the institutions functioning within the Employer's area of operations.
3. During the interviews, it should be confirmed that the Minor suspected of harming another Minor is not being harmed themselves by their Legal Guardians, other adults, or peers. If it turns out that this is the case, an intervention should also be carried out with respect to that Minor.
4. If the person suspected of Harming is a Minor aged between 13 and 17 and their behavior constitutes a criminal offense, the family court of local jurisdiction or the Police should also be informed by means of the relevant written notification.
5. If the person suspected of Harming is a Minor aged over 17 and their behavior constitutes a criminal offense, the local unit of the Police or the Prosecution Office should also be informed by means of the relevant written notification.

6.5 Support plan

1. With respect to a Minor being harmed, the Person Responsible for Providing Support to Minors shall develop an individual support plan adjusted to the needs of the Minor and the capabilities of the Employer and, if necessary, based on cooperation with other local entities, as listed in section 4.1.3. For this purpose, the Person Responsible for Providing Support to Minors may contact the personnel of the school attended by the Minor who is

completing vocational learning or a pupil internship. The plan should contain elements concerning actions intended to ensure the safety of the Minor, including:

- 1) the ways of isolating the Minor from the persons suspected of harming them and enabling the Minor to function freely;
 - 2) an offer of the support that can be provided, including by other institutions;
 - 3) referring the Minor to another institution, if necessary. A list of places to which the Legal Guardians of the Minor may be referred if they need help for themselves or their child constitutes Appendix No. 6.
2. The plan should be developed together with the Minor's Legal Guardians and discussed with the Minor. If one of the Legal Guardians is the person harming the Minor, the plan shall be developed in cooperation with the non-harming Legal Guardian of the Minor.
 3. A support plan, adjusted to the needs of the Minors and the capabilities of the Employer, shall also be developed with respect to the Minors who witnessed harming.

7 Principles of safe use of the Internet

7.1 Obligations of the Employer

1. When providing Minors with access to the Internet, the Employer shall take actions protecting Minors against access to content that could be a threat for their correct development.
2. The following are considered a threat related to the use of the Internet and electronic media by Minors:
 - 1) access to illegal content, including content showing sexual abuse of Minors, pornographic content, content that promotes racism and xenophobia, and other illegal content constituting a threat to the safety of Minors;
 - 2) access to harmful and inappropriate content, including:
 - a) content that shows cruelty and bodily injuries;
 - b) content that shows drastic scenes, such as death or cruelty to animals;
 - c) content that encourages the viewer to take self-destructive actions;
 - d) content that encourages violence, crime, radical behaviors (including sects), and extremism;
 - e) trash streams;
 - f) discriminating content;
 - g) pornographic content;
 - 3) access to harmful and inappropriate online contacts and services, resulting e.g. in peer pressure, cyber violence, and access to commercials not intended for the age of the viewer;

- 4) access to harmful and risky behaviors, including participating in online challenges, exerting pressure, and using violence through information and communication technologies.
3. When providing Minors with access to the Internet via the Employer's own wi-fi network (or in another manner), the Employer shall take actions intended to block access to content that is illegal, harmful, and inappropriate to the Minors. For this purpose:
 - 1) the scope of securing and blocking access to content that is illegal, harmful, and inappropriate to Minors shall be determined;
 - 2) specific software (including e.g. anti-virus software, user activity monitoring tools, etc.) shall be selected;
 - 3) securing and blocking software shall be installed;
 - 4) the software referred to in section 7.1.3.3 shall be updated on an ongoing basis.
4. A prerequisite for a Minor to be allowed to use the Employer's devices shall be the Minor reading and understanding the Principles of Safe Internet Use. Efforts shall be made to make sure that the process of reading and understanding is effective and corresponds to the needs of Minors.

7.2 Actions to be taken with respect to an incident

1. In the case of content that is illegal, harmful, or inappropriate to age or in the case of an incident having a negative effect for the safety of Minors in connection with using the Internet, the following actions shall be taken:
 - 1) every report/disclosure of harmful or inappropriate content should be registered, analyzed, and properly documented. The analysis should include a detailed description of the incident, specify the persons involved and/or the actions taken to identify the perpetrator, and materials documenting the incident. This evidence should be secured in a manner that respects the rights of the Minor, including their right to privacy;
 - 2) evidence should be secured and described (date of receipt, contents of the message, details of the sender: user name, e-mail address, website address). If the evidence gathered suggests a violation of legal regulations, the Police should be notified immediately;
 - 3) after the incident, regular post-intervention monitoring should be carried out, checking the situation and the needs of the Minors involved in the incident and/or the persons harmed as a result of the incident.

7.3 Actions to be taken with respect to incident participants

1. Actions concerning incident participants should be addressed to the persons harmed, the perpetrators, and the witnesses. Some actions may be related exclusively to working with the persons harmed; others will require various educational and/or disciplinary actions to be taken towards the perpetrator. It should be remembered that the actions taken will

mainly concern Minors, which means that s Minor's Legal Guardian will be involved in all of them.

2. The actions taken by the Employer should be planned, gradual, and adapted to the situation and shall be carried out in the following sequence:
 - 1) interviewing the witnesses of the incident, with the nature of the event and the role of the interviewee (harmed person/perpetrator/witness) taken into account. Language that shifts the guilt and responsibility to the harmed person should not be used;
 - 2) notifying the Legal Guardians and the persons involved in the incident and informing them about the actions taken by the Employer, and, if applicable, presenting the support plan developed for the harmed Minor;
 - 3) depending on the situation, notifying the Police or a court if a criminal offense is suspected;
 - 4) providing support and psychological/pedagogical care to the participants of the incident; care may also be provided by other institutions.

7.4 Corrective actions

1. In order to remove from the Internet materials that are illegal, embarrassing, or hurtful, the Legal Guardians of the Minor should be informed that this is possible in cooperation with Dyżurnet.pl (<https://dyzurnet.pl/>) or by reporting this content via the relevant form available on the website on which the materials were published.
2. The Minor should be informed about their right to be forgotten, which follows from the General Data Protection Regulation; in justified cases, this allows for removing specific links from the Google search engine, resulting in these links not being displayed in response to any phrase being entered in the search field.
3. If materials violating the intimacy and privacy of a Minor are published, it is also possible to use the Stop Non-Consensual Intimate Image Abuse website: <https://stopncii.org/>, which helps remove from the Internet intimate materials presenting the image of a person who did not agree for these materials to be published.

8 Monitoring

1. Once every two years, the Person Responsible for the Standards for the Protection of Minors shall evaluate the Standards in order to adapt them to the current needs and ensure their compliance with the applicable legal regulations.
2. Conclusions from the evaluation should be documented in writing.
3. In connection with the conclusions made, the Employer makes decisions with respect to whether the Standards for the Protection of Minors should be amended and publishes the new wording of the Standards.

9 Final provisions

1. These Standards, as introduced by the Employer, shall come into effect on the day of their publication.
2. Entities cooperating with the Employer are required to comply with these Standards if their operations include contacts with Minors.

10 Appendices

Appendix No. 1 – Representation on having no criminal record and on undertaking to comply with the fundamental principles of protection of minors

Appendix No. 1A – Representation on countries of residence in the last 20 years

Appendix No. 2 – Representation on having no criminal record and representation concerning a country other than Poland not maintaining a criminal register and not issuing certificates of no criminal record

Appendix No. 3 – Principles of safe relations between Andea personnel and minors

Appendix No. 4 – Principles of implementing the procedure of responding to difficult or aggressive behavior or violence on the part of a Minor

Appendix No. 5 – Intervention sheet

Appendix No. 6 – Where to refer a Legal Guardian looking for support for themselves and the Minor

Appendix No. 7 – Specimen of an intervention letter

Appendix No. 8 – Standards for the Protection of Minors – short version for Minors

Appendix No. 9 – Representation of a Minor and their parents/Legal Guardians on having read and understood the Standards for the Protection of Minors

Appendix No. 10 – Representation on having read and understood and undertaking to comply with the Standards for the Protection of Minors in force at the Andea Group

Appendix No. 11 – Andea Group's register of interventions

Appendix No. 1

(place, date)

**REPRESENTATION ON HAVING NO CRIMINAL RECORD AND ON UNDERTAKING TO COMPLY WITH
THE FUNDAMENTAL PRINCIPLES OF PROTECTION OF MINORS**

I, _____, PESEL number: _____, represent that I have not been convicted of a criminal offense against sexual freedom and decency or a criminal offense involving violence towards a Minor and no criminal or disciplinary proceedings is pending against me in this respect. Furthermore, I represent that I have read and understood the principles of protecting Minors that are in force at Andea and undertake to comply with them.

Signature

Appendix No. 1A

REPRESENTATION ON COUNTRIES OF RESIDENCE IN THE LAST 20 YEARS

(place, date)

(first and last name of the job applicant)

(name of the Employer or another organizer)

Pursuant to Article 21(5) of the Polish Law of 13/05/2016 on Combating Sex Crime and on the Protection of Minors (consolidated text: Journal of Laws of 2023, item 1304, as amended), I represent that in the last 20 years:

- ☐ I did not reside* in a country other than Poland and my country of citizenship;
- ☐ I resided in a country other than Poland and my country of citizenship, i.e., in

I represent that I am aware of the criminal liability for making a false statement.

(signature of the job applicant)

* Please strike out whichever does not apply.

Appendix No. 2

(first and last name)

(place, date)

(address)

**REPRESENTATION ON HAVING NO CRIMINAL RECORD AND REPRESENTATION
CONCERNING A COUNTRY OTHER THAN POLAND NOT MAINTAINING A CRIMINAL
REGISTER AND NOT ISSUING CERTIFICATES OF NO CRIMINAL RECORD**

I represent that the following country (countries):* _____
does not (do not) maintain a criminal register/does not (do not) issue certificates of no criminal record.

At the same time, I represent that I have not been convicted, in the above country (countries), of a criminal offense corresponding to the criminal offenses specified in Chapters XIX and XXV of the Polish Criminal Code, in Articles 189a and 207 of the Polish Criminal Code, and in the Polish Law of 29 July 2005 on Combating Narcotics Addiction, that no ruling has been issued with respect to me stating that I have committed such criminal offenses, and I that am not prohibited, under a ruling of a court or another authority or under statutory regulations, from holding any or specific positions, performing any or specific professions, or carrying out any or specific activities related to upbringing, education, rest, medical treatment, psychological counseling, spiritual development, sport, or other hobbies of Minors or related to exercising care over minors. I am aware of the criminal liability for making a false statement.

(legible signature)

* Please specify the country (countries).

Appendix No. 3

PRINCIPLES OF SAFE RELATIONS BETWEEN ANDEA PERSONNEL AND MINORS

The overriding principle for all of the actions taken by the Personnel shall be acting for the good of Minors and in their best interest. The Personnel shall treat Minors with respect, considering their

dignity and needs. Any form of violence or abuse towards a Minor is unacceptable. To this end, the members of the Personnel shall act in accordance with the applicable legal regulations, the Employer's internal regulations, and their competences. The principles of safe relations between the Personnel and Minors shall apply to all members of the Personnel and to all persons having contacts with Minors if such contacts take place in the Workplace and with the Employer's approval. Knowledge and acceptance of these principles shall be confirmed by each of the members of the Personnel.

Relations between the Personnel and Minors

You are required to maintain professional relations with Minors and to consider, in each individual case, whether your reaction, message, or action addressed to a Minor is appropriate to the situation, safe, justified, and fair with respect to other Minors. Act in a way that is overt and transparent to others, so as to minimize the risk of a wrong interpretation of your behaviors.

Communication with Minors

1. When communicating with Minors, be patient and respectful.
2. Listen to them attentively and provide answers that are appropriate to their age and the situation.
3. Do not embarrass, humiliate, disrespect, or insult Minors. Do not shout at Minors, unless this is necessary to ensure the safety of the given Minor or other Minors.
4. Do not disclose sensitive information concerning a Minor to unauthorized persons, including other Minors. This applies to the image of the Minor and the information about their family and their economic, medical, and legal situation.
5. When making a decision concerning a Minor, inform them about it and try and take into account their expectations.
6. Respect the Minors' right to privacy. If protecting a Minor means having to ignore the principle of confidentiality, explain it to them as soon as possible.
7. When working with Minors, try to be within the eyeshot and earshot of other members of the Personnel.
8. Do not behave in an inappropriate manner in the presence of Minors. This includes the use of vulgar words, gestures, and jokes, making offensive comments, and making use of a relationship of power or physical advantage over a Minor (intimidation, coercion, threats).
9. Assure Minors that if they do not feel comfortable in the given situation or about a specific behavior or specific words, they can talk about it to you or another person (depending on the intervention procedures in force at the Employer's) and that they can expect appropriate reaction and/or assistance.

Actions to be taken with respect to Minors

1. Appreciate and respect the contributions made by Minors, actively engage them, and treat them equally regardless of gender, sexual orientation, disability, social, ethnic, or cultural status, and world view.

2. Avoid favoritizing Minors.
3. Do not enter into any sexual or intimate relations with Minors and do not make inappropriate proposals to them. This includes sexual comments, jokes, and gestures as well as making available to Minors erotic and pornographic materials, regardless of their form.
4. Do not record the image of a Minor (e.g. filming, recording the voice, taking photos) for private purposes. This also includes permitting third parties to record the image of a Minor if the Employer has not been informed about it and has not agreed to it and if consent has not been obtained from the Minor's Legal Guardians and the Minor themselves.
5. Do not offer alcohol, tobacco products, or illegal substances to Minors and do not partake of these products and substances in the presence of Minors when carrying out official duties or staying in the Workplace.
6. Do not accept money or gifts from Minors or their Legal Guardians. Do not enter into any relations of dependence with a Minor or a Minor's Legal Guardians that could lead to accusations of unequal treatment or obtaining financial and other gains.

Physical contacts with Minors

All forms of violence or abuse towards Minors are unacceptable. However, there are situations where physical contact with a Minor is acceptable and in compliance with the principles of safe contact—when it is a response to the Minor's need in the given moment and considers the Minor's age, stage of development, and gender as well as the cultural and situational context. Still, it is impossible to define which forms of physical contact are universally acceptable since a behavior that is appropriate in the case of one Minor may be inappropriate in the case of another Minor. Always exercise professional judgment, listen, observe, and take note of the Minor's reaction; ask the Minor for permission to engage in physical contact (e.g. hugging) and remember that even if your intentions are good, they may be misinterpreted by the Minor or third parties. In particular:

1. do not hit, prod, shove, or otherwise violate the physical integrity of a Minor;
2. never touch a Minor in a way that could be seen as indecent or inappropriate;
3. always be ready to explain your actions;
4. be especially careful with Minors who have suffered violence or abuse or have been harmed, including sexually, physically, or through neglect. Experiences like that may sometimes cause a Minor to look to establish indecent or inappropriate physical relations with adults. In such a case always act tactfully, but firmly and help the Minor understand the meaning of personal boundaries;
5. physical contact with a Minor should never be covert or related to any reward and should never stem from a relation of power. If you witness any of the above behaviors and/or situations from other adults or Minors, always report this to the responsible person and/or act in accordance with the applicable intervention procedure.

Contacts outside of working hours

In principle, you should only contact Minors during working hours and for purposes within the framework of your duties.

Protecting Minors

1. If you work with a Minor who has been harmed, including sexually, physically or through neglect, be careful and keep your distance in order to protect the Minor. Always explain the boundaries of a relation to a Minor.
2. If a case of harming is suspected or disclosed, always allow the Minor to speak out, present their standpoint/opinion, bearing in mind that for the Minor, this could be the first and only conversation on this topic (the Minor might never attempt to look for support again). It is particularly important to:
 - 1) assure the Minor that they were right to speak about the harm done to them;
 - 2) explain to the Minor that they are not guilty of what has happened;
 - 3) be clearly negative about any form of violence or abuse, sending a clear message that you believe this is unacceptable and should be prevented/stopped;
 - 4) inform the Minor that other, competent people will handle this matter and that actions will be taken to make sure that the Minor is safe.

Appendix No. 4**PRINCIPLES OF IMPLEMENTING THE PROCEDURE OF RESPONDING
TO DIFFICULT OR AGGRESSIVE BEHAVIOR OR VIOLENCE ON THE PART OF A MINOR**

1. If a Minor is observed to display excessive tension, irritation, or difficulties suggesting a probability of occurrence of a difficult behavior, including aggression, self-aggression, or a

behavior posing a threat to the Minor or their surroundings, actions should be immediately taken in order to prevent the occurrence of such a behavior, including by starting a calming conversation, if possible, on a neutral topic (the method of shifting attention) or engaging in another calming activity.

2. If difficult or unwanted behaviors escalate, an attempt should be made to extinguish or interrupt them, depending on the situation.
3. If the actions taken in the given situation do not produce results and an escalation of difficult, aggressive, or self-aggressive behaviors follows, the person appointed to carry out an intervention or other members of the Personnel located nearby should be informed, asking for assistance; these persons shall immediately notify decision-makers or specialist and provide assistance.
4. In the event of a highly aggressive behavior that cannot be stopped and that poses a threat to the life and health of the Minor and other persons, first aid should be immediately provided if necessary, an ambulance and/or the Police should be called, and then the Minor's Legal Guardians should be notified—in such a case, if this is necessary, possible, and safe for every person involved in the incident, the least invasive form of interrupting the act of aggression may be used.
5. The safety of each of the persons involved in the incident, including witnesses, should be ensured.
6. If circumstances allow, the person specified in the intervention procedure shall immediately start a conversation allowing the Minor to express themselves and present their standpoint/opinion in order to determine the reasons and the circumstances of the incident; during the talk with the Minor, all of the important information should be noted down, unless this would disrupt the talk; after the conversation, a memo shall be produced with respect to the incident and the information provided by witnesses; the situation shall be reported to the Coordinators.
7. Until it is certain that the situation has been defused and the difficult behavior has stopped, the Minor shall not be left alone.
8. The safety of all of the persons involved in the incident, including witnesses, should be ensured and they should be provided with assistance, e.g. psychological/pedagogical counseling. If the Employer has no capabilities in this respect, he may refer these persons to the entities listed in section 4.1.3.

Special conditions for intervention conversations

1. The conversation should not take place under the pressure of time, the Minor should not be rushed, and the talk should be adapted to the needs and capabilities of the Minor; the Minor's language and forms of communication should be taken into account.
2. During the conversation, the Minor should be allowed to speak freely, including if they want to disclose their fears; the Minor should not be interrupted or criticized; their

statements should not be supplemented with your own speculations; you should not comment on the information provided by the Minor and should not minimize the importance of what has happened.

3. The conversation should take place in a calm atmosphere; after it is concluded, the Minor should receive appropriate support until the situation has been stabilized and the Minor has calmed down. The Minor cannot be left alone until it becomes certain that the situation has been stabilized.

Appendix No. 5

INTERVENTION SHEET

1. First and last name of the Minor	
2. Reason for intervention (type of harm)	

3. Person reporting suspected harm		
4. Description of actions taken	Date	Action
5. Meetings with the Minor's Legal Guardians	Date	Description of the meeting
6. Form of intervention used (please circle the relevant option)	<ul style="list-style-type: none"> • Notification of suspected criminal offense • Request for examining the situation of the Minor/family • Another form of intervention. Please specify: 	
7. Details of the intervention (name of the authority to which the intervention has been reported) and date of the intervention		
8. Outcome of the intervention: Actions of law enforcement authorities, if information on outcomes/actions of parents was provided	Date	Action

Appendix No. 6

WHERE TO REFER A LEGAL GUARDIAN LOOKING FOR SUPPORT FOR THEMSELVES AND THE MINOR

1. **Local Social Welfare Centers** – in addition to economic, legal, housing, material, and other support, many of these Centers offer workshops that help improve skills in terms of raising

children, courses on parental competences, and Parents Academy classes. Moreover, Social Welfare Centers offer assistance provided by family assistants (at the request of parents) and the option to apply for a personal assistant to be appointed for a disabled person if the family takes care of a child holding a certificate of disability. For many families, the possibility of having the support of an assistant is what saves the child and the family from a lasting crisis. Social Welfare Centers provide their services free of charge.

2. **Crisis Intervention Centers** – these are run by district authorities. They offer assistance to persons who have found themselves in a difficult situation or lost their mental balance due to e.g. the death of a close one, their own illness, the illness of their child or close one, divorce/separation, family conflicts, or a threat of violence/abuse. The Centers also provide psychological counseling, carry out crisis interventions, and organize short-term therapy, workshops, and support groups. Crisis Intervention Centers provide their services free of charge.
3. **Psychological/Pedagogical Counseling Centers** – these provide diagnostic assistance and counseling, organize psychoeducational courses and courses that improve parental skills (e.g. schools for parents, positive discipline workshops, workshops for parents of ADHD-diagnosed children). They hire certification teams, which allows for obtaining a certificate confirming the need for special education, early development support, or an individual curriculum. Psychological/Pedagogical Counseling Centers provide their services free of charge.
4. **Specialist Family Counseling Centers** – public centers providing psychological assistance and support to couples and families. They organize counseling sessions for individuals and families and organize psychotherapy for children and adults as well as workshops and groups for adults. Specialist Family Counseling Centers provide their services free of charge.
5. **Early Intervention Centers** – these offer comprehensive, coordinated, and multi-dimensional specialist assistance to children aged under 7 and their Legal Guardians (in terms of taking care of the child). Early Intervention Centers function within the framework of the National Health Fund; a referral from a physician is required. At an Early Intervention Center, a child can be provided with early development support therapy, physical therapy, speech therapy, and other forms of assistance. Early Intervention Centers provide their services, which are daytime services, free of charge.
6. **Daytime Support Centers** (formerly: Day-Care Centers) – a child's stay at the Center may last for several hours (mainly after school), is free of charge and voluntary, and the offer is addressed primarily to families that have problems with raising and caring for their school-age children. At a Daytime Support Center, a child can have a meal, find someone to help them with their homework, take part in social therapy and compensation classes, etc.
7. **Mental Health Centers for Adults and Mental Health Centers for Children and the Youth** – these offer support to children and parents in a mental crisis or having parental problems (individual assistance, therapy groups, and workshops). The Centers function within the framework of the National Health Fund.

8. **Children Assistance Centers** – institutions where children who are victims of criminal offenses and their Legal Guardians receive comprehensive and interdisciplinary assistance. This means that the case of a child who comes to the Center is managed, from the beginning to the end, by the same group of professionals. At the meetings of an interdisciplinary team, they make decisions together on what type of support the child and its Legal Guardians need. The assistance strategy is carried out, to the extent possible, by school employees: psychologists, physicians, welfare specialists. The Center is also the place where a court hearing of a child takes place, if one is required. A map of the Centers is available at <https://centrapomocydzieciom.fdds.pl/>.
9. **National and local NGOs** that support parents and children. Parents should be encouraged to check and look for an offer that suits their needs. The available options include support groups (for parents of small children, for grieving parents, for parents of children with disabilities, etc.), counseling and psychological therapy, workshops and psychoeducational classes for parents, workshops for children.
10. **Trust Phone Line** for children and the youth (116111) operated by the Dajemy Dzieciom Siłę Foundation – free of charge, anonymous, available 24/7 in Polish, Ukrainian, and Russian languages; <https://116111.pl>
11. **Children’s Trust Phone Line organized by the Children’s Ombudsman** (800121212) – free of charge, anonymous, available 24/7 in Polish, Ukrainian, and Russian languages, <https://800121212.pl>

Appendix No. 7

SPECIMEN OF AN INTERVENTION LETTER

1. Specimen of a notification of a potential criminal offense

(place, date)

Regional Prosecution Office in Kraków

Reporting person: _____

(full name and address of the Employer)

represented by: _____

correspondence address: _____

NOTIFICATION OF A POTENTIAL CRIMINAL OFFENSEI hereby notify a potential criminal offense consisting in _____, perpetrated to
(please describe)the detriment of the minor _____
(first and last name, date of birth)by _____
(first and last name of the alleged perpetrator)**JUSTIFICATION**While _____ was carrying out official duties
(first and last name of the member of the Personnel)with the minor _____, the minor disclosed worrying information
(first and last name)
concerning_____
(description of the situation)

Considering the above and the well-being and safety of the minor, please initiate proceedings in this case. More information is available from:

(first and last name, contact details)

Please send any and all correspondence to the registered address of the company.

(signature of the person responsible for interventions)

Appendix No. 8**STANDARDS FOR THE PROTECTION OF MINORS – SHORT VERSION FOR MINORS**

Andea Group's Standards for the Protection of Minors are a document that has been developed in order to ensure that you, Minors, are treated with dignity and respect and protected from harm.

We especially want you to feel safe and comfortable at Andea.

The document is divided into several parts:

1. Identifying a situation where harm is being done to a Minor

- 1) All of the members of the Personnel must react if you or another Minor is being harmed.
- 2) There are various forms of doing harm, including:
 - a) physical violence, including pushing, hitting, pinching, kicking, and throwing objects at someone;
 - b) emotional abuse, including insulting, ridiculing, calling names, making fun of;
 - c) sexual abuse, including forcing someone to watch naked people, making photos or recording videos of Minors with no clothes on, forcing someone to touch the private areas of other people;
 - d) neglect, i.e., failure to satisfy the physical and emotional needs of a Minor, including failure to provide food, proper clothing or cosmetics, failure to send a child to school, and failure to take a child to the doctor.
- 3) If you have experienced any of the above forms of harm from an adult or another Minor, tell a member of our Personnel about it. According to the type of situation, the relevant procedure will be initiated.

2. Selection of Personnel members

We verify whether your Vocational/Pupil Internship Coordinator has previously engaged in violence or abuse. For that purpose, every job applicant is screened in this respect against the relevant register; this person is also required to provide the relevant documents confirming that they have never engaged in violence or abuse.

3. Taking actions

- 1) Always let a member of our Personnel know if something makes you worried or if you are not feeling safe—we will take actions, carrying out an intervention. An intervention will also be carried out if we notice that something is dangerous for you.
- 2) We can also call the Police to support us; sometimes we fill out special documents and send them to the relevant authorities.

4. Principles of safe relations

- 1) For your comfort, we have written down several principles we will comply with:
 - a) the overriding principle for all of the actions taken by each of the members of our Personnel is acting for your good and in your best interest;
 - b) we treat you with respect, considering your dignity, needs, and right to privacy;
 - c) any form of violence or abuse towards you is unacceptable;
 - d) entering into any sexual or intimate relations with you is unacceptable;

- e) recording your image (e.g. filming, recording the voice, taking photos) for the private purposes of a member of our Personnel is unacceptable;
 - f) every form of contact between a member of our Personnel and you must be overt and a result of carrying out official tasks and duties;
 - g) it is unacceptable to maintain contacts where a member of our Personnel gives you money or presents or uses their advantage, power, or your dependence in order to satisfy their own needs;
 - h) our Personnel makes sure that every message, action, or activity addressed to you is appropriate to the situation, your level of development, and your mental and physical capabilities, as well as safe, justified, and not resulting in unequal treatment of you versus other Minors, including in the form of favoritizing.
- 2) The members of the Personnel are also required to pay special attention to inappropriate behaviors among Minors.
- 3) These behaviors include in particular:
- a) all forms of violence or abuse;
 - b) bullying, in particular when using vulgar and offensive language;
 - c) shaming, humiliation, disdain;
 - d) recording of image (taking photos or recording videos) without the Minor's consent, especially in a situation that may cause embarrassment or insult;
 - e) comments intended to be offensive, intimidating, coercive, or threatening;
 - f) actions that violate the right to privacy.

5. Safe use of the Internet and electronic devices

- 1) The Employer provides you with access to the Internet on a device owned by him, making sure that you are secured against access to content that can be a threat to your proper development.
- 2) At the Workplace, during a break, you have the right to use a mobile phone and other electronic devices with your own access to the Internet, provided that the use of these devices does not interrupt the work of other persons around you.
- 3) If other members of the Personnel notice that you play dangerous content on your private device, this will be reported to the Vocational/Pupil Internship Coordinator in order to implement preventive measures.
- 4) Nobody is allowed to record you without your consent; you should not record anyone without their consent, either.

6. Evaluation of the Standards for the Protection of Minors

We review this document at least once every two years. If we notice the need for changes, we must implement them.

7. Publishing the Standards for the Protection of Minors and making them available

- 1) The Standards for the Protection of Minors come into effect on February 26th, 2025 and remain in force until repealed.
- 2) We have made Andea Group's Standards for the Protection of Minors available in the Guidelines & Policies folder that can be accessed by all members of our Personnel and on the www.andea.com website.

Appendix No. 9

REPRESENTATION OF A MINOR AND THEIR PARENTS/LEGAL GUARDIANS ON HAVING READ AND UNDERSTOOD THE STANDARDS FOR THE PROTECTION OF MINORS

I, the undersigned, represent that I have read and understood the documentation comprising the Standards for the Protection of Minors in force at the Andea Group.

(date, signature of the Minor)

(date, signature of a Legal Guardian)

Appendix No. 10

REPRESENTATION ON HAVING READ AND UNDERSTOOD AND UNDERTAKING TO COMPLY WITH THE STANDARDS FOR THE PROTECTION OF MINORS IN FORCE AT THE ANDEA GROUP

I, the undersigned _____, represent that

(first and last name of the member of the Personnel)

I have read and understood the Standards for the Protection of Minors in force at the Andea Group and undertake to comply with them.

(signature of the person making the representation)

Appendix No. 11

ANDEA GROUP'S REGISTER OF INTERVENTIONS

#	First and last name of the Minor	Date and place	Reporting person	Type of harm, person doing the harm or suspected of harming the Minor	Procedures and forms of providing assistance to the Minor used	Persons, institutions, and external authorities notified	Type of documentation produced during the intervention (official memos/intervention sheets/conclusions, etc.)



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