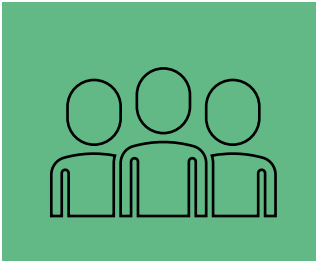


# LERG

## MINORS PROTECTION STANDARDS



## INTRODUCTION

These Minors Protection Standards are put in place in accordance with the legal requirement under the Act of 13 May 2016 on counteracting the threats of sexual offences and the protection of minors.

LERG SA puts this document in force in its capacity as an employer providing practical vocational training in the form of apprenticeships based on agreements with schools.

This document defines specific rules, principles and practices to ensure that minors undergoing practical vocational training at LERG SA are safe and free from harm from employees or peers.

The guiding principle of all actions taken by LERG SA and its employees in its provided practical vocational training is to act for the good and in their best interest of minors.

## Chapter I DEFINITIONS

### Article 1.

The following terms used in this document, whether written in lower-case or upper-case, have the meanings set forth in the definitions below:

1. **Employer** – LERG Spółka Akcyjna with its registered office in Pustków-Osiedle at the following address: Pustków-Osiedle 59D, 39-206 Pustków 3, entered into the Register of Entrepreneurs of the National Court Register under the number KRS 0000033727 or, as the case may be, members of the Management Board of LERG SA or other persons appointed by the Management Board to manage the workplace;
2. **Employee** – any person employed at the Employer under an employment contract or a civil-law contract, including an apprentice, volunteer, trainee, who is not a minor;
3. **School** – a school with which the Employer has entered into an agreement for practical vocational training and at which the student undergoing practical vocational training with the Employer is enrolled;
4. **Minor** – any person under 18 years of age, who is undergoing practical vocational training with the Employer;
5. **Legal guardian** – the legal representative of a minor, including a parent or custodian, foster parent or temporary guardian;
6. **Consent of legal guardian** – consent of at least one of the parents or legal representatives of a minor; in the absence of agreement between the parents or representatives, the case must be resolved by a guardianship court;
7. **Vocational training supervisor** – an employee designated by the Employer to supervise the provided vocational training;

- 8. Standards** – this document containing Minors Protection Standards, enacted by the Employer in accordance with Article 22b et seq. of the Act of 13 May 2016 on counteracting threats of sexual offences and the protection of minors;
- 9. MPS Coordinator** – an employee designated by the Employer as a coordinator for minors protection standards, with a detailed job description as specified in Article 4 of the Standards;
- 10. Harm to/harming a minor** – any conduct towards a minor which constitutes a prohibited act against him/her, neglect of a minor (intentional or unintentional), as well as any act or omission resulting in the violation of the rights, freedoms, personal interests of a minor or disruption of his/her development, including in particular:
- a. physical violence – bodily harm, infliction of pain or threat of bodily harm, as well as other acts or omissions as a result of which a minor suffers actual physical harm or is potentially at risk of such harm,
  - b. psychological violence – a repeated pattern of conduct towards a minor or an extremely drastic event (or events) that causes a minor to lose their self-esteem, including: emotional unavailability, emotional neglect, hostility-based relations with a minor, blaming, denigration or rejection, failure to notice or recognize the minor's individuality, inadequate socialization, demoralization, constant criticism, involving a minor in an adult conflict, manipulating a minor,
  - c. sexual violence – engaging in sexual activity with a minor, including physical contact (e.g. touching a minor, having sexual intercourse with a minor) and conduct without physical contact (e.g. showing pornographic materials to a minor, voyeurism, exhibitionism, verbal harassment),
  - d. neglect – failure to meet the basic material and emotional needs of a minor by a parent or legal guardian, failure to provide adequate food, clothing, shelter, medical care, safety, lack of supervision over the minor's compulsory education compliance,
  - e. peer violence (bullying) – all non-random acts violating personal freedom or contributing to the physical and psychological harm of a minor, out of the social principles of mutual relations, including: physical violence (beating, pulling, pushing, destroying belongings, taking and extorting money, spitting, kicking, forcing to perform humiliating, ridiculing activities, including sexual ones), verbal violence (calling names, insulting, ridiculing, threatening, provoking), relational violence (exclusion from a peer group, persuading others to reject the victim, gossiping),
  - f. cyberbullying – harassment, intimidation, ridiculing by sending messages and comments, posting or disseminating compromising content, photos, videos on the Internet.

## Chapter II

### General provisions and responsible persons

#### Article 2

1. In view of practical vocational training provided, the Employer takes action to prevent harm to minors, in particular by:
  - a. establishing rules of safe relations between Employees and minors and between minors themselves,
  - b. establishing rules for responding to signs of harm to minors,
  - c. ensuring that Employees acting as vocational training supervisors are well-prepared to perform the function,
  - d. setting out appropriate job descriptions of Employees.
2. Vocational training supervisors and other Employees in contact with minors should have at least basic knowledge of the signs of harm to minors, and pay attention to their occurrence as part of the duties they perform.
3. Vocational training supervisors and other Employees in contact with minors as part of their duties should take into account the situation and well-being of minors.
4. The Employer and Employees cooperate closely with the staff of schools where minors are enrolled in terms of the protection of minors. Where necessary, the Employer may also cooperate with health care facilities, social welfare

centres, psychological and pedagogical counselling centres, the Police and other relevant authorities and institutions.

#### Article 3

1. Before an Employee is designated as a vocational training supervisor, the Employer must exercise special care in verifying such Employee and preparing him or her to perform the functions related to working with minors.
2. Before entering into an employment relationship with a vocational training supervisor or before allowing a vocational training supervisor to work with minors, the Employer is required in particular to:
  - a. obtain information whether the person is entered in the Sex Offenders Registry,
  - b. meet other requirements under Article 21 of the Act of 13 May 2016 on counteracting threats of sexual offences and the protection of minors,
  - c. obtain from the Employee a statement of clean criminal record in accordance with Article 120 (3a) of the Act of 14 December 2016 School Education Law.
3. Any certificates, information, statements and other documents confirming compliance with the requirements referred to in para. 2 above must be attached to the Employee's personal file.
4. The provisions of paras. 2 and 3 above also apply to other Employees permitted by the Employer to work with minors.

**Article 4**

1. Under these Standards, the Employer entrusts its designated MPS Coordinator with the following functions and related duties and responsibilities:
  - a. the function of the person responsible for receiving reports of incidents threatening minors and for intervening in the event of suspected harm or having information about harm to a minor,
  - b. the function of the person responsible for filing notifications of suspected offences committed against a minor, notifying the guardianship court and other authorities,
  - c. the function of the person responsible for providing support to a minor,
  - d. the function of the person responsible for preparing/training Employees to apply the Standards,
  - e. the function of the person responsible for reviewing, monitoring the application and updating the Standards.
2. In view of the functions listed in para. 1 above, the duties and powers of the MPS Coordinator include in particular:
  - a. to receive reports of the disclosure of signs of harm to a minor or of harm to a minor, and of disclosed or reported incidents or events that threaten the well-being of a minor,
  - b. to initiate and carry out interventions in the event of suspected harm or having information about harm to a minor,
  - c. to file notifications of suspected offences committed against a minor, notify the guardianship court and other authorities,
  - d. to develop support plans for minors,
  - e. to provide support to minors, in particular through the implementation of a support plan,
  - f. to maintain, update and keep a register of disclosed or reported incidents or events that threaten the well-being of a minor,
  - g. to prepare/train Employees to apply the Standards,
  - h. to deliver educational activities to Employees and to document the same,
  - i. to ensure that the Standards are made available to those interested,
  - j. to work with vocational training supervisors and other Employees in contact with minors,
  - k. to monitor the application of the Standards and to update the same,
  - l. to perform other tasks as specified in the Standards.
3. In the event of a temporary absence of the MPS Coordinator, the Employer will designate another Employee to deputize in performing the functions assigned to the MPS Coordinator.
4. The Employer provides the contact details of the MPS Coordinator or the deputy (phone number, e-mail address, place of work) to Employees and minors.

**Article 5**

Where the Employer provides practical vocational training to minors with disabilities or special educational needs, including those socially maladjusted or at risk of social maladjustment, the Employer takes into account the situation of such minors and adapts the methodologies of vocational training and application of the Standards to them, being guided by the recommendations provided by the school staff, the certificates and opinions issued by psychological and pedagogical counselling centres, or by an occupational medicine physician.

**Chapter III**

**Rules to ensure safe relations between minors and Employees and safe relations between minors themselves, in particular the identification of prohibited conduct**

**Article 6**

1. Employees must know and apply the principles of safe relations with minors set out in the Standards.
2. Vocational training supervisors and other Employees in contact with minors act within the framework of applicable law, these Standards and other internal policies of the Employer and their job descriptions.
3. Vocational training supervisors and other Employees in contact with minors must perform their duties in a way

that ensures respect for the rights of minors (in particular the right to privacy), treat minors with respect and take into account their personal dignity and needs.

4. The guiding principle of all actions taken in connection with minors should be to act for the good of the minors and in their best interest.
5. Any contact between an Employee and a minor should be public, take place as a rule only during working hours and concern only purposes that fall within the job description of the Employee.
6. In contacts with minors, Employees must act in a manner transparent to others in order to minimize the risk of their conduct towards minors being misinterpreted. An Employee may be alone with a minor only in exceptional and justified cases.
7. Employees must treat minors equally and equitably regardless of their gender, sexual orientation, disability, social, ethnic, cultural, religious status or world-view, and also avoid any form of favouritism towards minors.
8. When communicating with minors, Employees must be patient and polite, and use means of expression appropriate to the age of minors, the level of their psychological and physical development and the circumstances at hand.
9. In contacts with minors, Employees must openly communicate that where a minor feels uncomfortable in a situation, in particular due to a specific conduct or words of the Employee, they may report this to the vocational training supervisor or other designated person, and have the right to expect an appropriate response.

10. The following conduct is unacceptable and prohibited:
- a. the use of violence against a minor in any form, including verbal violence,
  - b. any conduct that could violate the personal space of a minor or cause him or her to feel threatened, uncomfortable or afraid,
  - c. establishing any relationship of a sexual or intimate nature with a minor or making any proposals of such nature to a minor,
  - d. maintaining contacts with a minor based on the provision of financial or material gratification, resulting from the use of physical advantage, a relationship of power or dependency, with the intention to satisfy or fulfil the Employee's needs,
  - e. embarrassing, humiliating, disrespecting or insulting a minor,
  - f. using vulgar or indecent words, gestures and jokes in contacts with a minor, referring in speech to sexual activity or attractiveness or making erotic/pornographic content available to a minor, regardless of its form,
  - g. violating the physical integrity of a minor or any form of physical contact with a minor that may be considered inappropriate or indecent, including covert or hidden physical contact with a minor,
  - h. recording the image of a minor (e.g. filming, voice recording, taking photos) for purposes not directly related to the Employee's official duties,

- i. disclosing sensitive information about a minor to unauthorized persons, including other minors (in particular, covering the minor's image, information about his/her family, economic, medical, guardianship or legal circumstances),
- j. initiating or maintaining any contact with a minor outside the place and hours of work without the knowledge and consent of the Employer and the minor's legal guardian,
- k. initiating or maintaining any contact with a minor through private communication channels (private phone, e-mail, instant messaging, social media profiles, etc.), without the knowledge and consent of the Employer and the minor's legal guardian,
- l. offering alcohol, tobacco products or illegal substances to a minor, as well as using the same in the presence of a minor while on the Employer's premises.

### **Article 7**

1. Vocational training supervisors must monitor the interactions between minors to ensure their safety and the application of the principles set out in these Standards.
2. Minors undergoing practical vocational training with the Employer are to be familiarized with the principles of safe relations between minors as set out in these Standards, along with information that it is their duty to comply with these principles.
3. Minors should address each other with respect and politely.

4. Minors should respect the personal rights and freedoms of their peers, including the right to privacy, the right to their own opinion, identity, appearance and conduct – within the boundaries of socially accepted norms and values, the right to protect their property.
5. Any conflicts between minors should be resolved amicably, with focus on mediation with the participation of other minors.
6. The following conduct is unacceptable and prohibited in relations between minors:
  - a. using violence in any form, including verbal, sexual and cyberbullying,
  - b. any conduct that could violate the personal space of another minor or cause him or her to feel threatened, uncomfortable or afraid,
  - c. ridiculing other minors, mocking other students for their weaknesses, publicly criticizing,
  - d. using vulgar or obscene language.
7. Minors are forbidden to consume alcohol, use tobacco products or illegal substances, or possess such substances while on the Employer's premises.
8. Minors must follow safety rules and avoid creating dangerous situations on the Employer's premises.
9. Minors may not stay in places other than those designated for the purposes of their vocational training, nor may they move around the Employer's premises on their own without the consent of the vocational training supervisor.

## Chapter IV

### **Rules and procedures for intervening in the event of suspected harm or having information about harm to a minor, including procedures for filing notifications of the same to the relevant authorities and institutions**

#### **Article 8**

1. The intervention procedures set out in this Chapter of the Standards are made to support Employees in fulfilling their legal and social obligations to respond in the event of suspected harm or having information about harm to a minor.
2. In view of the objective set out in para.1 above and the fact that threats to the safety of minors may take various forms, Employees should first and foremost be guided by the qualification of harm to a minor in line with the definition contained in Article 1(10) of these Standards.
3. When taking action in the event of suspected harm to a minor or having information about harm to a minor, Employees should first and foremost consider the well-being of the minor and ensure his or her safety.
4. Vocational training supervisors and other Employees in contact with minors should be vigilant to irregular conduct of minors that may indicate that they are being harmed and, if they suspect such harm, should carefully attempt to contact the minor, demonstrating understanding and sensitivity. If a minor, on his or her own initiative, tries to contact an Employee in a way that indicates suspected harm to the minor, the Employee should listen to him or her.



**Article 9**

1. The person responsible for receiving reports of incidents threatening minors and for intervening in the event of suspected harm or having information about harm to a minor is the MPS Coordinator. The MPS Coordinator is also responsible for filing notifications of suspected offences committed against a minor, notifying the guardianship court and other authorities and institutions.
2. Notwithstanding para. 1 above, Employees must be aware that in the event of a justified suspicion of an offence (whether committed, attempted or plotted) involving rape, sexual intercourse or other forms of sexual abuse against a minor under the age of 15, they are under a legal obligation to immediately notify the relevant law enforcement agency (the Police or prosecutor), failing which they may be held criminally liable with a penalty of imprisonment for up to 3 years. The obligation to notify lies with any Employee who suspects that an offence referred to in the previous sentence has occurred, regardless of any notifications that may be made in accordance with the procedure provided for below in this Chapter of the Standards. In the event of other offences against minors, Employees are under a social obligation to notify the Police or prosecutor.

**Article 10**

1. Where any Employee suspects that a minor is being harmed, or where such incident has been reported to the Employee by the minor or his or her legal guardian, the Employee is obliged to prepare a memo and pass it over to the MPS Coordinator. The memo should be prepared and submitted in writing or sent via email on the same day that the Employee becomes aware of the suspicion or information. If, on the day of becoming aware of the suspicion or information, the Employee is not able to prepare

a memo in accordance with the previous sentence, he or she should inform the MPS Coordinator by phone and prepare the memo as soon as possible, referring in the memo to the previous oral report made by phone.

2. Immediately upon receipt of a report from a minor, from an Employee in the procedure set out in para. 2 above or from any other person, the MPS Coordinator must commence the intervention in accordance with the provisions of this Chapter of the Standards. First and foremost, the MPS Coordinator is obliged to ensure the minor's safety and, if the circumstances so require, to separate the minor from the person causing harm.
3. In the event of a report of harm caused by a person acting as the MPS Coordinator, the intervention is carried out by the Employer's Management Board or a member of the Management Board designated for this function.
4. In the event of a report of harm caused by a member of the Employer's Management Board, where no other person has been designated to conduct the intervention, the intervention is to be carried out by the person who identified the harm or to whom suspected harm was reported.
5. The MPS Coordinator or another person in charge notifies the principal of the school where the minor undergoing practical vocational training is enrolled about the intervention undertaken. As part of the intervention, the person in charge of the intervention may work with school staff, including the school psychologist.
6. All those who, in performing their official duties, have obtained information about harm to a minor or related information are obliged to maintain confidentiality, excluding the provision of necessary information to the relevant authorities or institutions as part of the intervention process.

**Article 11**

1. In the event of a report of suspected harm to a minor caused by an Employee, the MPS Coordinator immediately informs the Employer and the line manager of the Employee concerned.
2. The MPS Coordinator conducts interviews with the minor and his or her legal guardians and other persons who may have knowledge of the incident, in order to establish the course and circumstances of the incident. During the interview, the minor's legal guardians are provided with the findings about the incident, any intervention undertaken and about the available options of expert support.
3. In order to establish the circumstances of the incident and investigate the case, the Employer organizes and conducts an interview with the Employee concerned, to be attended also by the MPS Coordinator and the Employee's line manager.
4. Until the case is resolved, the Employee suspected of harming a minor is removed from all forms of contact with the victim and other minors.
5. If the findings made confirm the suspicion of an offence committed by the Employee, the MPS Coordinator must immediately prepare a relevant notification and file the same on behalf of the Employer with the Police station or prosecutor's office having jurisdiction. The Employer may, at its discretion, authorize another person to prepare and file the notification.
6. In the case described in para. 5 above and where it is found that the Employee has harmed a minor without, however,

committing an offence under law, the Employer, based on the information collected by the MPS Coordinator, will decide to apply appropriate disciplinary measures to the Employee responsible for harming the minor, taking into account the established circumstances of the case, relevant legal provisions and internal regulations in force at the Employer.

7. After the intervention, the MPS Coordinator will notify the minor's legal guardians of the actions taken in accordance with paras. 5 and 6 above, or of the findings made as part of the investigation where these did not confirm harm to the minor.

**Article 12**

1. In the event of a report of suspected harm to a minor caused by his or her legal guardian, family member, household member or other adult not affiliated with the Employer, the MPS Coordinator conducts an interview with the minor. Depending on the circumstances, the MPS Coordinator may also conduct interviews with other persons who may have knowledge of the incident and the minor's personal situation, if such persons are available.
2. If the findings made confirm the suspicion of an offence committed against the minor, the MPS Coordinator must immediately prepare a relevant notification and file the same on behalf of the Employer with the Police station or prosecutor's office having jurisdiction. The Employer may, at its discretion, authorize another person to prepare and file the notification.

3. Where it is found that a minor is being harmed in a form that does not constitute an offence under law, and in other justified cases, the MPS Coordinator takes the following actions:
  - a. in the event of suspected harm to a minor that may constitute domestic violence within the meaning of the Act of 29 July 2005 on counteracting domestic violence, the MPS Coordinator will notify the social welfare centre competent for the minor's place of residence, which may then initiate the "Blue Card" procedure,
  - b. where it is determined that the well-being of a minor may be at risk, the MPS Coordinator will notify the guardianship court competent for the minor's place of residence that there are grounds for initiating ex officio proceedings under Article 572 of the Code of Civil Procedure.
4. If possible and justified by the circumstances, the MPS Coordinator will provide the findings about the incident, information on actions taken and the available options of expert support to the minor's legal guardian or adult family member other than the person causing harm.

### **Article 13**

1. In the event of a report of suspected harm to a minor caused by another minor undergoing practical vocational training with the Employer, the MPS Coordinator conducts an interview with the minor suspected of causing harm and his or her legal guardians, and separately with the minor harmed and his or her legal guardians. The MPS Coordinator also conducts interviews other persons who may have knowledge of the incident, in order to establish the course and circumstances of the incident.

2. If the findings made confirm the suspicion of an offence committed where the suspect is a minor who is over 17 years of age (or over 15 years of age in the case of suspected offences under Article 10 §2 of the Criminal Code), the MPS Coordinator must immediately prepare a relevant notification and file the same on behalf of the Employer with the Police station or prosecutor's office having jurisdiction. The Employer may, at its discretion, authorize another person to prepare and file the notification.
3. If the person suspected of causing harm is a minor who is under 17 years of age (or 15 years of age in the case referred to in para. 2 above), and his or her conduct may constitute an offence, or if the findings made confirm a significant degree of demoralisation of the minor suspected of causing harm, the MPS Coordinator will notify accordingly the guardianship court or the Police station competent for the minor's place of residence.
4. If the findings made confirm that the minor suspected of causing harm may himself or herself be a victim of harm caused by legal guardians, other adults or peers, the MPS Coordinator will also undertake appropriate intervention in relation to that minor.
5. If possible and justified by the circumstances, the MPS Coordinator will provide the findings about the incident, information on actions taken and the available options of expert support to the legal guardian of the minor harmed.
6. Where an interview with the legal guardians of a minor harmed shows that they are not interested in helping the minor, are ignoring the incident or are failing to support the minor as appropriate, the MPS Coordinator will notify the guardianship court competent for the minor's place of residence that there are grounds for initiating ex officio proceedings under Article 572 of the Code of Civil Procedure.

**Article 14**

In an emergency, especially if there is a suspicion that a minor's life is in danger or that he or she is at risk of serious harm to health, the relevant services (the Police, ambulance, social welfare centre) should be immediately notified by phone. The services are to be notified by the Employee who first became aware of the danger, and who then prepares a memo and passes it to the MPS Coordinator to take over the intervention, to be carried out in accordance with the procedures described in this Chapter of the Standards.

**Chapter V**  
**Principles for establishing a minor support plan**

**Article 15**

1. The person responsible for providing support to a minor is the MPS Coordinator.
2. Where it is found that a minor is being harmed, the MPS Coordinator prepares an individual support plan, tailored to the minor's needs and the Employer's capabilities. The support plan should be prepared in consultation with the staff of the school where the minor is enrolled, including the school psychologist.
3. The plan should include instructions on actions to ensure the minor's safety, including:
  - a. ways of separating the minor during practical vocational

training with the Employer from persons suspected of causing harm,

b. identification of expert institutions and facilities where minors and their legal guardians can obtain support.

4. The support plan should be discussed with the minor and the minor's legal guardians, unless they are suspected of causing harm to the minor.
5. Where necessary, the MPS Coordinator will prepare a support plan tailored to the minor's needs and the Employer's capabilities also for minors who are direct witnesses to harm.

**Chapter VI**  
**Procedures for documenting and rules for keeping a register of disclosed or reported incidents or events that threaten the well-being of a minor.**

**Article 16**

1. The Employer establishes an internal register of disclosed or reported incidents or events threatening the well-being of a minor, kept in written form. The register is kept at the Employer's registered office in a manner that ensures protection against access by unauthorized persons.
2. The person responsible for maintaining, updating and keeping the register is the MPS Coordinator.

3. The register must be used to file complete documentation of disclosed or reported incidents or events that threaten the well-being of a minor, in particular:
  - a. report with the identification of the reporting person,
  - b. the course of the intervention and the dates of the actions taken,
  - c. minutes or memos of interviews and meetings held and records of other findings made as part of the intervention,
  - d. documents produced as part of the intervention (including official memos, copies of notifications/requests sent to the relevant authorities and other correspondence in connection with the intervention),
  - e. the support plan, where prepared.

## Chapter VII

### Rules for using electronic devices with Internet access and procedures for protecting children from harmful content and threats on the Internet or recorded in other formats

#### Article 17

1. As part of the practical vocational training, the Employer does not provide minors with the use of electronic devices with Internet access, nor access to the Internet itself.

2. The Employer prohibits the use by minors of their own electronic devices with Internet access (in particular mobile phones, tablets, laptops and other similar devices) during activities being part of practical vocational training and while on the Employer's premises.
3. The prohibition set out in para. 2 above does not apply to urgent contacts between a minor and a parent or legal guardian, or other justified cases of using a device subject to prior consent of a vocational training supervisor.

#### Article 18

1. Harmful content and threats on the Internet should be understood as materials available online that may evoke negative emotions in the recipient or promote dangerous conduct, including in particular:
  - a. pornographic content, including child pornography, i.e. materials presenting the sexual exploitation of children,
  - b. content depicting violence, physical harm, body deformities, e.g. photos or videos of accident victims, cruelty to animals,
  - c. content encouraging self-harm or suicide, or conduct that is harmful to health, e.g. the pro-ana movement, encouraging the use of dangerous substances, e.g. medicines or drugs,
  - d. discriminatory content, inciting hostility or hatred towards various social groups or individuals,
  - e. access to harmful online contacts and online services that trigger, among others, peer pressure, cyberbullying,

grooming, sexual blackmail, sexual activity as a source of income for minors, online gambling, access to age-inappropriate advertising, access to age-inappropriate social media,

- f. access to harmful and risky behaviours that trigger, among others, taking up online challenges, sexting, exerting pressure, violence through information and communication technologies.
2. Where the organizer of the vocational training or another Employee in contact with minors finds that during their stay on the Employer's premises, minors are gaining access to harmful or threatening content on the Internet, the Employee must immediately report this to the MPS Coordinator.
3. After analyzing the report, the MPS Coordinator takes the following actions:
  - a. if the circumstances confirm the suspicion of an offence committed, the MPS Coordinator must prepare a relevant notification and file the same on behalf of the Employer with the Police station or prosecutor's office having jurisdiction,
  - b. The MPS coordinator conducts an interview with the minor participant (victim/perpetrator/witness),
  - c. The MPS coordinator notifies the legal guardians of the incident participants.

## Chapter VIII

### Principles for preparing Employees to apply the Standards, principles for reviewing and updating the Standards and documenting these activities

#### Article 19

1. The person responsible for preparing Employees to apply the Standards is the MPS Coordinator.
2. Preparing Employees to apply the Standards includes making the content of the Standards available to all Employees in accordance with Article 21 and Article 22 of the Standards.
3. Moreover, the MPS Coordinator arranges for and conducts training for organizers of vocational training and other Employees who may have contact with minors as part of their duties. The scope of the training covers the application of the rules, principles and procedures set out in the Standards and basic information on recognizing the signs of harm to minors. The MPS coordinator can use ready-made, widely available training solutions, e.g. in the form of e-learning.
4. Each Employee referred to in para. 3 above makes a written declaration that he or she has familiarized himself or herself with the Standards and confirms in writing that he or she has completed the training.

### **Article 20**

1. The person responsible for reviewing, monitoring the application and updating these Standards is the MPS Coordinator.
2. The MPS Coordinator monitors the application of the Standards on an ongoing basis and responds to cases of violation of the Standards by Employees by presenting appropriate requests and recommendations to the Employer.
3. At least once every 2 years, the MPS Coordinator verifies these Standards in terms of their effectiveness, fitness for purpose, alignment with current needs and compliance with applicable regulations. As part of the verification, the MPS Coordinator may conduct a survey among vocational training supervisors and other Employees in contact with minors.
4. The verification referred to in para. 3 above is closed with a written report that the MPS Coordinator prepares and submits to the Employer, with any recommendations and directions for updating the Standards.
5. Notwithstanding the verification referred to in para. 3 above, the MPS Coordinator may at any time, if he or she deems it appropriate, submit to the Employer a proposal for amendment to the Standards.

## **Chapter IX**

### **Introduction and entry into force of the Standards and the principles and method of**

### **making them available to Employees, minors, parents or guardians**

#### **Article 21**

1. The Standards are publicly available to Employees, minors, parents and legal guardians of minors.
2. The currently applicable version of the Standards is published on the Employer's website ([www.lerg.pl](http://www.lerg.pl)) and made available in paper form in a visible place at the Employer's premises, so that all those interested persons can freely familiarize themselves with the document.
3. Before starting practical vocational training with the Employer, each minor receives an abridged version of the Standards to read, containing key information for minors. Vocational training supervisors discuss the content of the Standards and how to apply them with minors.

#### **Article 22**

1. These Standards are put in place by decision of the Employer. Information about the introduction of the Standards, together with their text, is announced in the manner usually used at the Employer and communicated to all Employees through official channels.
2. These Standards enter into force upon their announcement, with effect from 15 August 2024.
3. Any amendments to the Standards will be made in the manner specified in para. 1 above.

MINORS PROTECTION STANDARDS

• **LERG 2024**

[www.lerg.pl](http://www.lerg.pl)