RESOLUTION XIV/357/24 OF THE CITY COUNCIL

of 20 November 2024

on the adoption of the "Open Krakow" Programme for the years 2024-2028.

Pursuant to Article 7(1)(19), Article 18(1), Article 30(2)(1) of the Municipal Self-Government Law of 8 March 1990 (uniform text, Journal of Laws of 2024, items 1465, 1572), Article 4(1)(5) and (5a), (9), (13), (20), (26) of the Law on Public Benefit and Volunteer Work of 24 April 2003 (uniform text, Journal of Laws of 2024, item 1491) and Resolution CXXIII/3361/23 of the City Council of Krakow of 22 November 2023 on the adoption of the Cooperation Programme of the Municipality of Krakow for the year 2024 with non-governmental organizations and the entities referred to in Article 3(3) of the Law on Public Benefit and Volunteer Work of 24 April 2003, it is resolved as follows:

- **§ 1.** The "Open Krakow" Programme for the years 2024–2028, which is provided an appendix hereto, is hereby adopted.
- § 2. Resolution LII/964/16 of the City Council of Krakow of 14 September 2016 on the adoption of the "Open Krakow Programme is no longer binding.
- § 3. The Resolution shall be executed by the President of the City of Krakow.
- § 4. The Resolution shall enter into force on the date of its adoption.

Deputy Chair of the City Council of Krakow

Iwona Chamielec

"Open Krakow" Programme for the years 2024–2028

Table of contents Introduction: Rationale behind the Programme......2 Diagnosis of the socio-demographic situation of representatives of national and ethnic minorities, and people with migration experience in Krakow.....4 Chapter 2.......9 Obligations arising from Krakow's membership in the Intercultural Cities Programme (ICC) of the Council of Europe¹¹......9 Chapter 3......10 Financial expenditure and sources of funding for the Programme......15

Introduction: Rationale behind the Programme

Krakow continues to evolve and adapt to ever-changing social and economic realities. One of the priorities of planning the further development of the city is to have a strategic vision on how to administer a multicultural city in the age of dynamic migration processes and consequent changes in the local policy. In the past few years, the Municipality of Krakow has cooperated with its social partners and adopted a variety of measures aimed at establishing such a strategy. One of such key measures adopted to this effect is the Resolution of the City Council of Krakow of 14 September 2016 adopting the "Open Krakow" Programme.

Since then, Krakow has undergone dynamic changes to the demographic structure of the city, and today it is estimated that 15%–20% of the city residents come from migrant or minority communities. Key to these changes were:

- **Development of the modern business services sector.** There are 257 business service centres in Krakow (as at Q3 2021), 205 of which are owned by foreign entities. The centres offer customer services in more than 30 languages. BPO, SSC/GBS, IT and R&D services centres in Krakow employ 82,600¹ people (as at Q3 2021).
- Migration related to the crackdown on public protests following the 2020 presidential election in Belarus. According to the records of the Social Insurance Institution (ZUS), the population of Belarusians in Krakow doubled between 2021 and 2022, reaching almost 6,000 people.
- Full-scale war in Ukraine. Almost 49,000 refugees from Ukraine obtained their national identification numbers (PESEL) in Krakow.² In 2022 (as at 1 April 2022), more than 177,500 Ukrainians, who left their country during the war, lived in Krakow.³

Cultural diversity, so characteristic of modern-day Krakow, is not only a challenge, but also a valuable resource for the city. It serves the local community and generates actual economic, social, and cultural benefits. This is way it is of utmost importance that the city makes use of this diversity and is ready for any potential future migration crises.⁴

¹ *Modern business services sector in Krakow*. The report was prepared for the City Office of Krakow by the Association of Business Service Leaders (ABSL).

² K. Pędziwiatr, W. Magdziarz, S. Szkołut, S. Luchik-Musiyezdova, *Diagnoza sytuacji migrantów przymusowych na terenie Krakowa [Diagnosis of the situation of forced migrants in Krakow]*. Jewish Association Czulent

³ M. Wojdat, P. Cywiński, Raport "Miejska gościnność. Wielki wzrost, wyzwania i szanse" [Raport "City hospitality. Large growth, challenges. and chances"]. Union of Polish Metropolises

⁴The European Migration Network (EMN) defines the migration crisis as "exceptional situations of mass influx of third-country nationals or stateless people arriving in an EU Member State or disembarked on its territory following search and rescue (SAR) operations. The influx is of such a scale and nature, taking into account, inter alia, the population, GDP and geographical specificities, including the size of the territory of the EU Member State concerned, that it renders the well-prepared EU Member State's asylum, reception or return system non-functional (...)". https://home-affairs.ec.europa.eu/networks/european-migration-network-emn/emn-asylum-and-migration-glossary/glossary/migration-crisis_en

The evaluation of the "Open Krakow" Programme (2016–2022) shows that its activities have been crucial in supporting refugees from Ukraine who arrived in Krakow after 24 February 2022. The networks and relations established when implementing the Programme played a decisive role in organizing the assistance. The events of that period highlighted that effective cooperation between the local government, the local community, and civil societies was crucial for the smooth and effective functioning of the City.

The "Open Krakow" Programme, adopted under a Resolution of the City Council of Krakow in 2016, was an important step towards integration and assistance for members of minority and migrant communities. Nonetheless, given the dynamics of migration processes and the fact that some years have passed since its adoption, the Resolution should be amended. If the new changes, seven years of experience in taking measures to build openness and social cohesion are to be taken into account, it is necessary to update assistance strategies and mechanisms not only for minority groups, but also for the city and its communities, so that they can thrive by building upon diversity as a local public good.

The Programme amendment is based on two key principles: horizontality and flexibility. In consideration of the foregoing, the provisions below focus on setting the framework and priorities of action areas, so that it is possible to address the changing needs of all residents more expeditiously and dynamically, applying the mechanisms at the level of self-government at hand at a given time. Another objective of the Programme is not only to create new solutions, but also to increase the accessibility and visibility of existing city programmes. This is why it does not list all available services and resources, nor does it duplicate initiatives or mechanisms referred to in other city policies and programmes, ensuring consistency of measures across all city sectors.

The "Open Krakow" Programme places its emphasis on the support for and development of self-governing and self-help organizations, since the successful implementation of the Programme depends on their ability to create and initiate projects, and to monitor and evaluate the Programme. It is crucial to empower the community of residents and their involvement in managing diversity and the city in general.

Based on its thematic scope, this Programme focuses on national and ethnic minorities, and people with migration experience, so that equal and equitable rights to the city are enjoyed by all its residents. Thereby, they can participate in creating a Krakow of equal opportunities and fair access to all its resources.

The Programme contributes to achieving the vision of the city formulated in the "Krakow Development Strategy – This is where I want to live. Krakow 2030", which includes accomplishing the strategic objective 5: A strong self-governing community of the residents of Krakow, and operational objective 5.3: Social cohesion.

The preliminary draft resolution amending the "Open Krakow" Programme was created in 2023 within the framework of the task commissioned to a non-governmental organization, the Czulent Association: Participatory development of recommendations to update the policy of integration of foreigners and representatives of national and ethnic minorities in Krakow – Participatory development of an update of the "Open Krakow" Programme. The public tasks were financed with funds from the City of Krakow.

Chapter 1

Diagnosis of the socio-demographic situation of representatives of national and ethnic minorities, and people with migration experience in Krakow

In order to understand the situation and needs of representatives of national and ethnic minorities, and people with migration/refugee experience in Krakow, three groups were defined for the purposes of the diagnosis:

- National and ethnic minorities. Pursuant to the Law on National and Ethnic Minorities and Regional Language of 6 January 2005, such minorities are separated based on six criteria, primarily on the number of people smaller than the rest of the population and the residence of the ancestors and ancestresses, members of the minority in question in the current territory of the Republic of Poland for at least 100 years. According to the above definition, Poland is home to nine national minorities: Belarusians, Czechs, Lithuanians, Germans, Armenians, Russians, Slovaks, Ukrainians, Jews; and four ethnic minorities: Karaites, Lemkos, Roma, and Tatars.
- **People who have experienced economic migration.** For the purposes of the Programme, the group is defined as people who came to Krakow from abroad in order to: (1) take up employment (applies to both low- and high-skilled positions), with the intention of either short-term or long-term stay; (2) families of those who came for employment purposes (children, parents); (3) people coming to Poland for educational purposes (students).
- **People who have experienced forced migration.** This category refers to the degree of voluntary or free movement of an individual or group. Motivations behind forced migration include seeking refuge or flight caused by a sudden environmental or political emergency (such as armed conflict).⁵

This division was impacted by several factors; firstly, the legal provisions specifically concerning these groups. Refugees and some people with forced migration experience enjoy the protection under international refugee law, which imposes special obligations on the countries with respect to such persons. National and ethnic minorities are defined in Polish law, and their identity and cultural heritage are protected and supported under the Law on National and Ethnic Minorities and Regional Language.

⁵ Pędziwiatr, K. (2022). Migracje globalne [*Global migrations*]. In: A. Malewska, M. Filary-Szczepanik (ed.), Globalizacja i współzależność [*Globalization and interdependence*]. Krakow: Wydawnictwo Naukowe Akademii Ignatianum w Krakowie.

The needs and challenges in terms of intercultural integration⁶ and social cohesion are an important factor. People with forced migration experience often need urgent humanitarian support, protection, and psychological assistance. They may be more vulnerable to trauma and various health problems. People with economic migration experience may be more often in need of support in terms of intercultural integration, vocational training, or general issues related to access to the labour market.

The perception of the above groups in the public debate is yet another factor. Views on migration often derive from stereotypes, misunderstandings, or even manipulation regarding the motivations and goals of people with migration experience, which are used to trigger negative emotions and create an unfavourable image of such a group. A debate pertaining to national and ethnic minorities usually relates to the foreign policy pursued and relations with the minority's countries of origin. Consequently, the public debate on national and ethnic minorities often focuses on the issue of loyalty to the country of origin and Poland, whereas the main issues in debates concerning people with migration experience typically include security, economic impact, and cultural differences.

National and ethnic minorities

The most numerous statutory minorities in Krakow are the Armenian, Russian, Slovak, Czech, Ukrainian and Jewish communities, and ethnic minorities such as the Lemkos and Roma. Their tangible cultural heritage is in the city and they are active in local and national NGOs based in Krakow. They mostly engage in cultural initiatives, national and ethnic identity building, and religious activities. The report evaluating the situation of minorities in Krakow⁷ concludes that these groups have a low level of identification with the measures within the "Open Krakow" Programme.

Because of their familiarity with the language and cultural contexts, they are more likely to notice signs of discrimination, making them more sensitive to these issues. In the work environment, they face discrimination based on "racism", prejudice, and misunderstanding of religious requirements. They are often judged through the lens of identity rather than competence. Cultural differences are a barrier, especially for the elderly. In terms of health, they experience difficulties in accessing health care due to cultural barriers and insufficient knowledge among medical personnel about different needs stemming from, for instance, religious and cultural backgrounds.

⁶ Intercultural integration is: the result of a two-way process based on Recommendation CM/Rec(2015)1 on intercultural integration and on the Intercultural Cities policy model, consisting of the effective, positive and sustainable management of diversity, on the basis of reciprocal and symmetrical recognition, under an overarching human rights framework.

⁷ A. Makówka-Kwapisiewicz, E. Mirga-Wójtowicz (2023), *Diagnoza sytuacji mniejszości narodowych i etnicznych w Krakowie [Diagnosis of the situation of national and ethnic minorities in Krakow*], Jewish Association Czulent

⁸ The word "racism" is commonly used in the context of discrimination based on ethnicity or skin colour, and is also used in Polish and international laws. It should be noted that current scientific knowledge shows that the division of humanity into "races" has no basis in biological reality. The term has deep historical and social roots. The consequences of "racism" are very real and affect lives of many people. For this reason, it is paramount to have appropriate sensitivity and awareness when it comes to the meaning of this term in the social context. This is why here the term "racism" is used in quotation marks.

Security is a key issue for minorities in Krakow. Their feeling of danger is reduced when city authorities expeditiously and firmly address crimes committed in public spaces, mitigating their sense of isolation and developing their trust in local government institutions. They are of the opinion that measures in terms of security should be firm and effective, and address actual needs.

National and ethnic minorities in Krakow have specific expectations from the city authorities regarding their representation, communication, and inclusion in the local community. They express the need for open dialogue, establishing regular forums and meetings at the magistrate's office, and creating advisory committees composed of their representatives. They expect the implementation of diversity training programmes for city officers, the increase of their representation in city institutions, the promotion of diversity in education, and the creation of initiatives fostering their active engagement in public matters. They also underline how important it is to cooperate with minority community organisations and to recognize forms of discrimination and exclusion they face.

People who have experienced economic migration

The data included in the "Diagnosis of the needs and expectations of economic migrants in terms of city integration," a report created as part of the "Participatory development of recommendations to update the policy of integration of foreigners and representatives of national and ethnic minorities in Krakow – Participatory development of an update of the "Open Krakow" Programme," in 2022 Krakow recorded a significant increase in the number of foreigners from different regions from all over the world.

The most dynamic growth was observed in the registration database of the Krakow City Office, where the number of non-EU residents, mainly Ukrainians, increased by 62% to 15,000 individuals. In the ZUS database of premium payers, there was a marked increase of 70% in the number of African nationals, and 55% — in the number of Asian ones. Those with migration experience from Asia became the second largest group of premium payers, while the largest group was non-EU Europeans, reaching 43,000. Representatives of migrant communities employed in Krakow primarily work in administrative services, information technology, and construction.

People with migration experience in Krakow mostly include Ukrainians who account for 80% of the population, followed by Belarusians (10%), and Russians (5%). Citizens of the EU and UK are mostly Italians (14%) and Spanish (11%). It is important to note that in Krakow, there is an increase in the number of IT specialists from Belarus due to the relocation of companies from that country.

In the group of foreigners from EU countries, people performing work under an employment contract represent a significantly higher percentage than in the group of foreigners from non-EU countries (67.6% and 58.8%, respectively, in December 2022). EU citizens are much more likely to engage in non-agricultural activities than non-EU citizens (16.2% and 2.3%, respectively, in December 2022). More than 30,000 pursue business activity (ZUS, 2023) and, according to the Polish Economic Institute, Ukrainians established more than 10,200 new sole proprietorships in Poland from January to September 2022, and 3,600 companies with foreign capital were established (PIE, 2023). Foreigners living in Krakow are slightly better educated than the general population of the city, although the percentage of people with higher education is decreasing.

For a long time, heterogeneity among people with economic migration experience in Krakow has been growing, thus creating the need to support them with adapting in the city. Economic migrants who choose to live in Krakow usually have a higher level of education and higher qualifications, which can translate into higher social, cultural, and financial capital, and is a great potential for social activation and participation. There are still many challenges to be met, such as improving the sense of security among these people, providing language support, and raising the quality of dedicated public services. Many people with migration experience face a language barrier and difficulties in accessing information and participating in public life. Moreover, the housing market in Krakow should be regulated to ensure that tenants and landlords are treated adequately.

Interviews conducted as part of the diagnosis show that migrant communities expect that initiatives, such as the Multicultural Centre, will continue and be strengthened. It is also recommended to conduct anti-discrimination training within the school system, and support leaders in migrant communities. The city should also increase the accessibility of information for people with migration experience, through better visibility of the Information Point for Foreigners, and training of officials in intercultural communication. Language needs should also be included in such initiatives as the participatory budgeting.

People who have experienced forced migration

People who have experienced forced migration are a large group of people living in Krakow. Although the vast majority of these people are from Ukraine and arrived in the city after 24 February 2022, they also include many people from Belarus, Russia and other parts of the world who have taken refuge in Krakow from persecution.

According to the report *Diagnosis of the Situation of Forced Migrants in Krakow*, due to the profile of this group, their situation in the housing, education and labour markets poses many challenges. Forced migrant women with little work experience who have underage children and dependents under their care are in a particularly difficult situation in the Polish labour market. In June 2023, in Krakow and the entire Małopolska region, those covered by temporary protection were mostly women. A large percentage are people born between 2005 and 2023.

It is nothing new that foreigners reside in Krakow, but the sudden influx of people with forced migration experience is a new challenge for local public policies. People with forced migration experience in Krakow face many integration challenges, with the language barrier being the primary one. The lack of adequate state support for learning the Polish language and the difficulty of adjusting to the Polish labour market, even for educated people, is marginalizing them. As such, tasks helping this group to adapt to the Polish labour market should include increasing the availability of Polish language courses (not only at the beginner level), facilitating the process of qualification recognition, and, if recognition is not possible, providing training and vocational courses to help migrants retrain and find their place in the Polish labour market.

Women caring for children are particularly exposed to additional barriers and discrimination in the labour market. In addition, people with forced migration experience often experience

wage inequality and problems arising from the fact that the validity of their residence permits depends on employment.⁹

People with refugee experience in Poland, particularly from Ukraine, face numerous difficulties in becoming independent in the housing market. The main challenges include rising rental prices, limited financial resources, landlords' reluctance to rent space to refugees, and an insufficient supply of rental housing in Krakow. Those with refugee experience from vulnerable groups, such as women experiencing violence, people with disabilities, or ethnic minorities, face the greatest difficulties in this regard. The discriminatory and xenophobic narrative promoted by some media makes the situation even more difficult. There is a clear need for housing support for these people, whether from real estate agencies, NGOs, or other entities operating in the broader real estate market.

Educational institutions in Krakow have seen a significant increase of children with experience of forced migration, mainly from Ukraine. Despite this, there is also a large group of children who remain outside the Polish educational system. UNICEF estimates that this is even as many as two-thirds out of the 600,000 Ukrainian children in Poland aged 3-9, some of whom participate in remote classes in the Ukrainian educational system. The higher number of pupils from Ukraine, and also Belarus, India, and Russia, is evident in various types of educational institutions in Krakow, particularly in kindergartens and elementary schools.

The analysis underlines that both now, in the face of the conflict in Ukraine, and in the future, given the possibility of an influx of people with forced migration experience into the city, Krakow should pay special attention to the need to create appropriate, scalable emergency response mechanisms in the event of a potential refugee crisis. It is also important to introduce long-term, system mechanisms supporting and integrating refugees into the social and economic fabric of the city.

Summary

The division into national and ethnic minorities, people who have experienced economic migration, and people who have experienced forced migration stems from the methodology used to prepare the diagnosis, and does not fully reflect the heterogeneity and complexity of these groups, and the fluidity of terms such as "migrant" or "minority." These terms are difficult to define clearly as they are often shaped by social, historical, and political contexts. The following chapters refer to the Programme's target group as "national and ethnic minorities", and the more broadly and generally as a group of "people with migration experience." Despite the limitations arising from the rules governing the preparation of city programmes, the Programme for Krakow's intercultural community should take into account the complexity of this group of residents, so that narrowing the terms leaves no community out.

Page 8 of 30

⁹ National Bank of Poland (NBP) (2023). The living and economic situation of migrants from Ukraine. In Poland – the impact of the pandemic and war on the nature of migration in Poland, Survey Report, https://nbp.pl/wp-content/uploads/2023/04/Sytuacja-zyciowa-i-ekonomiczna-migrantow-z-Ukrainy-w-Polsce_raport- badaniaania-2022.pdf, p. 39.

Why are such concepts fluid and ambiguous? Here are some examples:

- (1) A migrant from Ukraine, Belarus, Germany, the Czech Republic, or Slovakia, once they received Polish citizenship, enjoys protection and support as a national minority under Polish law. However, previously, as citizens of other countries, they were seen as migrants.
- (2) Children from migrant families, born and raised in Poland, who obtain their Polish citizenship as adults, may still experience social exclusion, for example because of their skin colour or religion, and despite having a Polish identity, they may still be perceived by society as a migrant.
- (3) Children from multicultural marriages who function well within their parents' cultural circles may face exclusion due to their multiple identities. ¹⁰ They also do not fit into the common "migrant/migrant" category.
- (4) Children of Polish migrants who grew up abroad and then returned to Poland with their parents, despite holding Polish citizenship, may not know the local cultural codes, speak with an accent, and require support in adapting.

These examples show that issues of nationality, identity, and belonging are more complex than they might seem, underlining the need for an insightful and empathetic approach to diversity in society. The "Open Krakow" Programme does not focus only on integration and adaptation, which are sometimes the needs of certain people belonging to national and ethnic minorities and those with experience of migration, because it is also rooted in relations and social solidarity, and building the multicultural community of Krakow.

Chapter 2

Obligations arising from Krakow's membership in the Intercultural Cities Programme (ICC) of the Council of Europe¹¹

The Intercultural Cities Programme (ICC) was launched in 2008, originally as a joint programme of the Council of Europe and the European Commission. Due to interest and the need to expand the programme activities beyond European countries, after five years of joint operation, in 2013, the Council of Europe became the ICC's lead coordinator. Krakow joined the ICC Programme on 18 December 2020, becoming one of more than 150 member cities all over the world.

The ICC programme brings together the most multiculturally active cities from Europe and other continents. This gives Krakow the opportunity to benefit from and share good practices in managing a city with a structure that is diverse in terms of nationality,

Page 9 of 30

¹⁰ They can identify with many ethnic groups that their parents identify with.

¹¹ I. D'Alessandro (ed.), *Practical guide for applying the urban model of intercultural integration*. Council of Europe. https://otwarty.krakow.pl/program/266923,artykul,program_miast_miedzykulturowych_rady_europy.html

religion, ethnicity and social issues. With its membership in the ICC, Krakow has the opportunity to receive the support of internationally recognized experts, for instance, in the process of updating and preparing strategies for managing a multicultural city, solving specific problems of the city, etc.

The key elements for cities, as adopted by the Intercultural Cities Programme and thus providing the basis for activities aimed at city management, are as follows:

- Creating opportunities and spaces for deep interaction and co-creation with people of different cultural backgrounds and origins, in order to build trust and realise the creative potential of diversity.
- Establishing a governance model that enables all community members, regardless of their background or status, to develop their potential, realise their talents, and contribute to local prosperity.
- Power sharing involving people of different backgrounds in decision-making in city institutions, in terms of political, educational, social, economic, or cultural issues.
- Promoting intercultural competences in public, private, and civil society organizations.
- Embracing cultural pluralism and the complexity of identities through leadership discourse and symbolic action.
- Building an inclusive narrative and positive conflict management, breaking down stereotypes, and engaging in debate about the impact and potential that diversity might have in terms of local development.

These principles are helpful to include all newcomers and, more generally, people of various backgrounds, regardless of the reason they came to the city, how long they are staying, or their formal status. ¹² Membership in the Intercultural Cities Programme (ICC) of the Council of Europe is an important support mechanism for the implementation of the "Open Krakow" Programme and a platform for promoting Krakow's good practices and building its brand as a multicultural city of dialogue.

Chapter 3

General provisions

§ 1

The "Open Krakow" Programme, hereinafter referred to as the Programme, envisages a number of activities at the institutional and social levels, dedicated to the creation of a society living in community, using human, economic, and cultural potential of representatives of national and ethnic minorities, and people with migration experience for development, in harmony and mutual respect.

§ 2

Page 10 of 30

¹² I. D'Alessandro (ed.), *Practical guide for applying the urban model of intercultural integration*. Council of Europe. https://otwarty.krakow.pl/program/266923,artykul,program_miast_miedzykulturowych_rady_europy.html

Whenever this Programme refers to:

- (1) Municipality it shall be understood as the Municipality of Krakow;
- (2) Office it shall be understood as the City Office of Krakow;
- (3) municipal units it shall be understood as organizational units created under the Law on Municipal Self-Government of 8 March 1990 (Journal of Laws of 2024, items 1465, 1572) and the Law on Poviat Self-Government of 5 June 1998 (Journal of Laws of 2024, item 107) in order to perform the tasks of the Municipality of Krakow (as a city with poviat rights);
- (4) non-governmental organization it shall be understood as the entities referred to in Article 3(2) and (3) of the Law on Public Benefit and Volunteer Work of 24 April 2003, whose statutory purpose is to combat discrimination, "racism", xenophobia, to protect the rights of people with migration experience, to carry out activities for national and ethnic minorities, and to work for multiculturalism and promotion of tolerance;
- (5) minority organizations it shall be understood as organizations that satisfy all of the following conditions: (a) they define themselves as organizations bringing together people of a particular minority; (b) their statutes stipulate that they are organizations bringing together national minorities, ethnic minorities or minorities with migration experience; (c) they carry out activities for the minority they represent;
- (6) Programme Coordinator it shall be understood as a separate organizational unit created by the Mayor of the City of Krakow, implementing the "Open Krakow" Programme and coordinating the implementation of the Programme in the Municipality of Krakow, responsible for supporting initiatives and cooperation with representatives of national and ethnic minorities, and people with migration experience;
- (7) people with migration experience it shall be understood as a group of people who changed their place of permanent residence, moving from one country (whether it was an EU country or a so-called third country) to another, regardless of the reason for migration, whether voluntary (e.g., for economic reasons) or forced (e.g., due to war), and regardless of how long they stay. According to this definition, the group also includes short-term residents of Krakow: seasonal workers or students (it does not apply to tourist visiting Krakow). For the purposes of the Programme, this group also includes the descendants of migrants, who, although born in Poland, are influenced by the migration experience of their parents and grandparents;
- (8) national and ethnic minorities it shall be understood as people belonging to minorities defined in the Law on National and Ethnic Minorities, and the Regional Language on 6 January 2005. The Law distinguishes nine national minorities: Belarusians, Czechs, Lithuanians, Germans, Armenians, Russians, Slovaks, Ukrainians, Jews; and four ethnic minorities: Karaites, Lemkos, Roma, and Tatars. For the purposes of the Programme, minorities not distinguished in the Law, who are integrated into Polish society and have a strong national identity, such as the Vietnamese community, are also included in this group;
- (9) social inclusion it shall be understood as measures that offer all city residents equal opportunities to participate in the economic, social, cultural, and political life of cities, and provide them with fair access to public services;¹³

Page 11 of 30

¹³ Definition stipulated in *Przewodnik tworzenia polityk włączających osoby z doświadczeniem migracji w życie miast opracowanego [Guide to Creating Policies to Include People with Migration Experiences in the Life of Cities]* developed by the Laboratory of Urban and Regional Migration Policies, Centre of Migration Research of the University of Warsaw. https://www.migracje.uw.edu.pl/wp-content/uploads/2022/12/Spotlight-DECEMBER-2022.pdf

(10) intercultural integration – shall be understood as the result of a two-way process based on Recommendation CM/Rec(2015)1 on intercultural integration and on the Intercultural Cities policy model, consisting of the effective, positive and sustainable management of diversity, on the basis of reciprocal and symmetrical recognition, under an overarching human rights framework.¹⁵

Chapter 4

Objectives, tasks, and results of the Programme

§ 3

- 1. The primary objective of the Programme is to implement and carry out the policy of openness of the city of Krakow to representatives of national and ethnic minorities, and people with migration experience based on interdisciplinary approach to diversity management and creation of space conducive to building community identity among residents of Krakow.
- 2. The primary objective of the Programme shall be achieved:
- (1) by way of:
 - ✓ Ensuring equal and fair access to services dedicated to national and ethnic minorities, and people with migration experience;
 - ✓ Improving intercultural competencies of the personnel of the City Office, municipal units and in the Districts of the City of Krakow.

In order to achieve Specific objective 1: Improve the quality and accessibility of public services dedicated to national and ethnic minorities, and people with migration experience.

By accomplishing the following tasks:

- (1) Developing the activities of the information point for people with migration experience with comprehensive services and visibility in mind;
- (2) Developing and implementing an Intercultural Communication Strategy for the Municipality;
- (3) Updating the welcome package for people with migration experience;
- (4) Conducting trainings for employees of the Office, municipal units, and Districts of the City of Krakow on the accessibility of the Office for national and ethnic minorities, and people with migration experience, as well as on intercultural communication and measures for improving fair treatment;

Page 12 of 30

¹⁴Recommendation CM/Rec(2015)1 of the Committee of Ministers to member States on intercultural integration. https://search.coe.int/cm/Pages/result_details.aspx?ObjectID=09000016805c471f?

¹⁵ I. D'Alessandro (ed.), *Praktyczny przewodnik po miejskim modelu integracji międzykulturowej [Practical guide for applying the urban model of intercultural integration*]. Council of Europe. https://otwarty.krakow.pl/program/266923,artykul,program_miast_miedzykulturowych_rady_europy.html

- (5) Monitoring public services offered by the Municipality from the perspective of their accessibility for national and ethnic minorities and people with migration experience;
- (6) Conducting social research into migration and multiculturalism, also by performing the "Multiculturalism & Migration Observatory" Project.

(2) by way of:

- ✓ Increasing the agency of representatives of national and ethnic minorities, and people who migrated to the Municipality;
- ✓ Reinforcing the voice of representatives of national and ethnic minorities, and people who migrated to the Municipality.

In order to achieve Specific objective 2: Develop a systemic framework for interaction between the Municipality and representatives of national and ethnic minorities, and people with migration experience based on social solutions of deliberative democracy.

By accomplishing the following tasks:

- (1) Creating a framework for intersectoral cooperation: public administration, business, research centres, NGOs, and local communities, depending on the needs and current challenges;
- (2) The Mayor of the City of Krakow creating a separate organizational unit within the City Office of Krakow, tasked with supporting initiatives and cooperating with representatives of national and ethnic minorities, and people with migration experience;
- (3) The Programme Coordinator cooperating with other organizational units of the Office and municipal organizational units, NGOs, and other institutions and services operating in the Municipality, including cultural and educational institutions, and universities.

(3) by way of:

- ✓ Strengthening the promotion of Krakow as a place that provides inclusiveness and social cohesion:
- ✓ Increasing civic and social engagement of people with migration experience, and representatives of national and ethnic minorities.

In order to achieve Specific objective 3: Support social inclusion processes and create spaces that promote inclusiveness and social cohesion.¹⁶

By accomplishing the following tasks:

-

¹⁶ Social cohesion pertains to the shared values and sense of unity in a society, which establish strong bonds and solidarity among its members. Identity plays a key role in such relations, and influences our interactions and actions in a social context. Herbert Blumer emphasized the importance of identity as a mediator in social relations (Blumer 1969). Social cohesion and inclusion are closely linked. Societies with a sense of solidarity are characterized by cohesion, and individuals who are part of such societies feel included. Social inclusion is the process of "including" marginalized people into the so-called mainstream life through full participation in society, giving them the opportunity to participate fully in economic, cultural, and social life, following standards accepted in that society.

- (1) Developing the Multicultural Centre as a focal point for intercultural activities in Krakow;
- (2) Supporting socio-cultural animation initiatives undertaken by cultural and educational institutions in the Districts of Krakow;
- (3) Promoting city programmes that support the creation and development of NGOs among minority organizations, especially self-help and self-advocacy organizations;
- (4) Promoting and increasing accessibility of participatory mechanisms in Krakow for national and ethnic minorities, and people with migration experience;
- (5) Supporting the processes of integration of foreigners in Krakow by strengthening language competences learning the Polish language.

(4) by way of:

✓ Increasing social awareness among Krakow residents of the advantages offered by a diverse Krakow.

In order to achieve Specific objective 4: Develop the intercultural nature of Krakow and build the "Open Krakow" brand.

By accomplishing the following tasks:

- (1) Organizing events referring to the idea of multiculturalism, for instance, in the form of conferences, seminars, debates, and periodic festivals;
- (2) Organizing the competition for the title of "Krakow Ambassador of Multiculturalism", and promoting activities of those honoured with the title;
- (3) Providing patronage of, among others, the Mayor of the City of Krakow and other forms of support for projects, artistic, cultural, scientific, and educational initiatives dedicated to contemporary multicultural Krakow;
- (4) Conducting information and promotional activities about the "Open Krakow" Programme.

(5) by way of:

✓ Raising standards of education in a culturally and linguistically diverse.

In order to achieve Specific objective 5: Create a social platform to support the development of intercultural competencies among residents of Krakow.

By accomplishing the following tasks:

- (1) Preparing and implementing tools to support the development of intercultural competences in the school environment, based on a system of workshops conducted by local NGOs, municipal cultural institutions and cultural centres;
- (2) Preparing and implementing recommendations for schools on the social inclusion processes;
- (3) Preparing and implementing tools to support the development of intercultural competencies addressed to residents of Krakow, based on the activities of municipal cultural institutions and cultural centres, and local NGOs;

Page 14 of 30

- (4) Developing sensitivity to cultural diversity and the ability to use sensitive language in the context of cultural differences;
- (5) Developing intercultural and Roma assistance.
- (6) by way of:
 - ✓ Increasing support and a sense of security for groups at risk of social exclusion based on nationality or ethnicity.

In order to achieve Specific objective 6: Support groups at risk of social exclusion based on nationality, ethnicity, language, and religion, which includes implementation of response mechanisms to "racist" and xenophobic incidents.

By accomplishing the following tasks:

- i. Promoting information about and supporting initiatives to sensitize and respond to manifestations of discrimination and bias-motivated violence;
- ii. Performing risk analysis of potential intercultural, national, ethnic and religious conflicts based on statistical data obtained through multisectoral cooperation;
- iii. Improving the competences of personnel of the Office and municipal units, the Police, and the Municipal Police within the following scope: mediation, identifying and responding to discrimination and bias-motivated violence, conflict management and resolution;
- iv. Including representatives of national and ethnic minorities, and people with migration experience in existing systemic city activities focusing on security and crisis management of the city of Krakow.
- 3. The Programme contributes to achieving the vision of the city formulated in the "Krakow Development Strategy. This is where I want to live. Krakow 2030", which includes accomplishing the strategic objective: V Strong local government community of Krakow residents and operational objective V.3 Social cohesion.

Chapter 5

Financial expenditure and sources of funding for the Programme

8 5

- 1. Funds to execute the tasks under the Programme shall be allocated in the budget of the City of Krakow on an annual basis.
- 2. As far as possible, funds of various entities involved in the implementation of the Programme shall also be utilized to execute the Programme tasks, including:
 - (1) state budget funds,
 - (2) European Union budget funds,
 - (3) Council of Europe budget funds, also within the framework of the Intercultural Cities Programme (ICC),
 - (4) NGO funds,
 - (5) private and sponsorship funds,

Page 15 of 30

(6) funds of other entities involved in the implementation of the Programme.

Chapter 6

Internal cooperation and implementation of the Programme

§ 6

- 1. The Programme implementation is coordinated by the Programme Coordinator, and supervised by the Head of the Social Affairs Division.
- 2. The schedule of implementing the Programme together with the partners cooperating to prepare the implementation concept is stipulated in Table 1.
- 3. For horizontality of inclusion processes of people with migration experience and representatives of national and ethnic minorities to be implemented at the Office, and to improve the flow of internal and external information, the Mayor of the City of Krakow appoints Coordinators responsible for cooperation on the implementation of the "Open Krakow" Programme in individual organizational units of the Office and municipal units. The detailed scope of the Coordinator's tasks is specified in the relevant order of the Mayor of the City of Krakow.
- 4. The partners cooperating on the implementation of the Programme are the organizational units of the Office and city organizational units, and city cultural institutions and cultural establishments, municipal establishments responsible for the matters of:
 - (1) society,
 - (2) health protection and promotion,
 - (3) education,
 - (4) entrepreneurship and labour market,
 - (5) culture and national heritage,
 - (6) promotion and information,
 - (7) international cooperation,
 - (8) tourism,
 - (9) sports,
 - (10) security and crisis management,
 - (11) public space and public transportation,
 - (12) and other matters resulting from the implementation of the Programme.
- 5. The cells and units of the City Office of Krakow listed in (1) shall carry out activities related to the implementation of the Programme in cooperation with:
 - (1) Małopolska Regional Office,
 - (2) the Police,
 - (3) opinion and advisory bodies of the Office,
 - (4) NGOs and other representatives of the third sector,
 - (5) schools, educational institutions and universities,
 - (6) building administrations and housing cooperatives, tenants' associations, and representatives of private owners' organizations,
 - (7) industry corporations,
 - (8) the media,
 - (9) consular posts and representatives of foreign countries accredited in Krakow,

Page 16 of 30

- (10) associations and inter-municipal associations,
- (11) Districts of the City of Krakow,
- (12) other entities, public and non-public institutions within the scope of the Programme activity.
- 6. The implementation of the Programme shall be monitored using the field indicators specified in the Declaration of Results of the Open Krakow Programme, Table 2.
- 7. Programme Risks are referred to in Table 3.
- 8. The Mayor of the City of Krakow shall present to the City Council of Krakow a report on the completion of the Programme in a given year until 30 April of the following year.

Chapter 7 Programme implementation schedule

Specific objective	Tasks	Performance measures	Completion deadline	Product name	Implementers and cooperating partners
1. Improve the quality and accessibility of public services dedicated to national and ethnic minorities, and people with	(1) Developing the activities of the information point for people with migration experience with comprehensive services and visibility in mind;	Number of beneficiaries receiving assistance at the Information Point for Foreigners	continuous activity	Strategy of developing the information point	Programme Coordinator and NGOs
migration experience, through:	(2) Developing and implementing an Intercultural Communication Strategy for the Municipality;	Number of translated documents, procedures (services) into foreign languages	continuous activity	Developed intercultural communication strategy	Programme Coordinator and expert cells of the Office and city units together with NGOs

(3) Updating the welcome package for people with migration experience;	Number of package updates	until 31 December 2028	Updated welcome package	Programme Coordinator and expert units together with NGOs
(4) Conducting trainings for employees of the Office, municipal units, and Districts of the City of Krakow on the accessibility of the Office for national and ethnic minorities, and people with migration experience, as well as on intercultural communication and measures for improving fair treatment;	Number of trained employees	continuous activity	Conducting training	Programme Coordinator and the unit responsible for organizing training at the Office together with NGOs
(5) Monitoring public services offered by the Municipality from the perspective of their accessibility for national and ethnic minorities and people with migration experience;	Number of positive and negative survey answers	until 31 December 2028	Ready monitoring report	Programme Coordinator and cells responsible for running service points for residents

	(6) Conducting social research into migration and multiculturalism, also by performing the "Multiculturalism & Migration Observatory" Project.	Number of reports	continuous activity	Ready research report	Programme Coordinator and research centres
2. Develop a systemic framework for interaction between the Municipality and representatives of national and ethnic minorities, and people with migration experience based	(1) Creating a framework for intersectoral cooperation: public administration, business, research centres, NGOs, and local communities, depending on the needs and current challenges;	Number of meetings/Number of participants	continuous activity	Ready social platform including a number of mechanisms from the field of participation	Programme Coordinator, NGOs, businesses, and research centres.
on social solutions of deliberative democracy, through:	(2) The Mayor of the City of Krakow creating a separate organizational unit within the City Office of Krakow,	The amount of funds allocated for the operation of the said unit, including	until 31 December 2024	Order of the Mayor Information on the completion of the business plan	Programme Coordinator

	tasked with supporting initiatives and cooperating with representatives of national and ethnic minorities, and people with migration experience;	Implementation of public tasks in the area: activities for intercultural integration of people with migration experience and activities for national and ethnic minorities			
	(3) The Programme Coordinator cooperating with other organizational units of the Office and municipal organizational units, NGOs, and other institutions and services operating in the Municipality, including cultural and educational institutions, and universities.	Number of cooperation coordinators in the Office, city units and other entities	continuous activity	Contact database of coordinators, responsible for cooperation in the area of interculturalism in their department/unit/entity.	Programme Coordinator with Programme Partners referred to in § 6. of the Programme
3. Support social inclusion processes and create spaces that promote inclusiveness and social cohesion, through:	(1) Developing the Multicultural Centre as a focal point for intercultural activities in Krakow;	Number of beneficiaries of the Multicultural Centre; Number of events held within the framework of the Multicultural Centre	continuous activity	Municipality premises donated for Multicultural Centre	Programme Coordinator with NGOs,

(2) Supporting socio- cultural animation initiatives undertaken by cultural and educational institutions in the Districts of Krakow;	Number of participants of events and initiatives	continuous activity	Ready programmes, initiatives, agreements, contracts	Municipal cultural institutions and cultural institutions in cooperation with the Districts of the City of Krakow
(3) Promoting city programmes that support the creation and development of NGOs among minority organizations, especially self-help and self-advocacy organizations;	Number of promotion activities	until 31 December 2028 r	Completed promotional activities of the annual and multi-year programme of cooperation of the Municipality with NGOs	Office cell responsible for coordinating cooperation with NGOs
(4) Promoting and increasing accessibility of participatory mechanisms in Krakow for national and ethnic minorities, and people with migration experience;	Number of dialogue bodies operating in the Municipality that include national and ethnic minorities and people with migration experience	until 31 December 2028	Promotional campaign of dialogue bodies and available participatory tools targeting national and ethnic minorities, and people with migration experience	Office cell responsible for dialogue and participation together with NGOs
(5) Supporting the processes of integration of foreigners in Krakow by strengthening language competences – learning the Polish language.	Number of foreigners learning the Polish language	continuous activity	Polish language course	Programme Coordinator and NGOs

4. Develop the intercultural nature of Krakow and build the "Open Krakow" brand, through	(1) Organizing events referring to the idea of multiculturalism, for instance, in the form of conferences, seminars, debates, and periodic festivals;	Number of events	continuous activity	Completed events	Programme Coordinator and Programme Partners referred to in § 6. of the Programme
	(2) Organizing the competition for the title of "Krakow Ambassador of	Number of competition applications	continuous activity	Organized gala of awarding titles	Programme Coordinator
	Multiculturalism", and promoting activities of those honoured with the title;	Number of events	continuous activity	Meeting of the Krakow Ambassadors of Multiculturalism with the Mayor of the City of Krakow	Programme Coordinator and the Office of the Mayor
	(3) Providing patronage of, among others, the Mayor of the City of Krakow and other forms of support for projects, artistic, cultural, scientific, and educational initiatives dedicated to contemporary multicultural Krakow;	Number of patronages	continuous activity	Patronage granted	Office of the Mayor

	(4) Conducting information and promotional activities about the "Open Krakow" Programme.	Number of hits on the "Open Krakow" website and reach of social media posts	continuous activity	Publications and posts	Programme Coordinator
5. Create a social platform to support the development of intercultural competencies among residents of Krakow, through	(1) Preparing and implementing tools to support the development of intercultural competences in the school environment, based on a system of workshops conducted by local NGOs, municipal cultural institutions and cultural centres;	Number of schools, educational institutions, cultural institutions participating in the activity	until 31 December 2028	Ready tools and materials.	Programme Coordinator, cells of the Office responsible for education and culture, municipal cultural institutions and cultural establishments together with NGOs,
	(2) Preparing and implementing recommendations for schools on the social inclusion processes;	Number of school establishments that received recommendations	until 31 December 2028	Ready recommendations for the development of intercultural education	Programme Coordinator, the Office unit responsible for education, school establishments together with NGOs,

(3) Preparing and implementing tools to support the development of intercultural competencies addressed to residents of Krakow, based on the activities of municipal cultural institutions and cultural centres, and local NGOs;	Number of people, City Office units, city organizational units, NGOs involved in the preparation of the programme	until 31 December 2028	Ready tools and materials	Programme Coordinator, the Office cell responsible for education, the Office cell responsible for culture, school institutions together with NGOs, scientific centres
(4) Developing sensitivity to cultural diversity and the ability to use sensitive language in the context of cultural differences;	Number of trainings and workshops for pedagogical staff, parents and guardians/Number of training participants	until 31 December 2028	Trainings Workshops	Programme Coordinator, the Authority's cell responsible for education, NGOs
(5) Developing intercultural and Roma assistance.	Number of assistants/Number of children and youth with assistants	continuous activity	Database of contacts of intercultural and Roma assistants	Programme Coordinator, the Office cell responsible for education together with NGOs

6. Support groups at risk of social exclusion based on nationality, ethnicity, language, and religion, which includes implementation of	(1) Promoting information about and supporting initiatives to sensitize and respond to manifestations of discrimination and bias- motivated violence;	Number of outreach activities undertaken; number of initiatives supported	continuous activity	Ready brochure on rights and duties of people living in Krakow	Programme Coordinator, the Office cell responsible for education, security in the Municipality, NGOs
response mechanisms to "racist" and xenophobic incidents, through:	(2) Performing risk analysis of potential intercultural, national, ethnic and religious conflicts based on statistical data obtained through multisectoral cooperation;	Number of analyses; Number of entities involved in the preparation of risk analyses; Police statistics	continuous activity	Regular meetings of the risk monitoring team/group from the perspective of building community cohesion	Programme Coordinator, the unit of the Office responsible for security in the Municipality, the Districts of the City of Krakow, Krakow Contact Centre or its equivalent
	(3) Improving the competences of personnel of the Office and municipal units, the Police, and the Municipal Police within the following scope: mediation, identifying and responding to discrimination and biasmotivated violence, conflict management and resolution;	Number of participants in training, seminars, workshops	until 31 December 2028	Training, seminars, workshops	Programme Coordinator in cooperation with the unit responsible for organizing training in the Office, the unit of the Office responsible for security in the Municipality, together with NGOs

Appendix to Resolution XIV/357/24 of the City Council of Krakow of 20 November

	(4) Including representatives	Number of	until 31 December	GMK and NGO meeting on	Programme
	of national and ethnic	representatives of	2028	security issues.	Coordinator
	minorities, and people with	national and ethnic			and Office unit
	migration experience in	minorities, and people			responsible for
	existing systemic city	with migration			security in the
	activities focusing on	experience involved in			Municipality.
	security and crisis	Safe Krakow activities			
	management of the city of				
	Krakow.				

Chapter 8 Declaration of Programme results

Primary	To implement and carry out the policy of openness of the city of Krakow to representatives of national and ethnic minorities, and people								
objective:	with migration experience based on interdisciplinary approach to diversity management and creation of space conducive to building								
Outcome	community identity among residents	community identity among residents of Krakow.							
of the									
Programme									
by way of	 Ensuring equal and fair access to services dedicated to national and ethnic minorities, and people with migration experience; Improving intercultural competencies of employees of the City Office, city institutions, and in the Districts of the City of Krakow; Increasing the agency of representatives of national and ethnic minorities, and people who migrated to the Municipality; Reinforcing the voice of representatives of national and ethnic minorities, and people who migrated to the Municipality. Strengthening the promotion of Krakow as a place that provides inclusiveness and social cohesion; Increasing civic and social engagement of people with migration experience, and representatives of national and ethnic minorities. Increasing social awareness among Krakow residents of the advantages offered by a diverse Krakow. Raising standards of education in a culturally and linguistically diverse. Increasing support and a sense of security for groups at risk of social exclusion based on nationality or ethnicity. 								
NO.	In order to	Indicator	Weight	Baseline value	Expected value	Annual value			
Specific objective 1	Improve the quality and accessibility of Improve the quality and accessibility of public services dedicated to national and ethnic minorities, and people with migration experience.	Share of foreigners receiving advice at the Information Point for Foreigners	0.25	4.2%	at least 4% per	2023			
Specific objective 3	Support social inclusion processes and create spaces that promote inclusiveness and social cohesion.	Participation of foreigners learning the Polish language	0.25	3.3%	at least 3% per annum	2023			
Specific objective 4	Develop the intercultural nature of Krakow and build the "Open Krakow" brand.	The number of events referencing the idea of multiculturalism	0.25	400	400	2023			
Specific objective 6	Support groups at risk of social exclusion based on nationality, ethnicity, language, and religion, which includes implementation of response mechanisms to "racist" and xenophobic incidents.	Participation of people at the City Office of Krakow and the Municipal Police trained to implement response mechanisms to "racist" and xenophobic incidents	0.25	2.6%	at least 2% per annum	2023			

Chapter 9 Programme risks

No.	Specific objective	Name of the risk	Risk assessment	Risk response
1.	Improve the quality and accessibility of public services dedicated to national and ethnic minorities, and people with migration experience.	Unequal access to services dedicated to national and ethnic minorities, and people with migration experience as a result of discrimination showed by city officers.	3	Countermeasures (training)
2.	Develop a systemic framework for interaction between the Municipality and representatives of national and ethnic minorities, and people with migration experience based on social solutions of deliberative democracy.	The Municipality loses its credibility as a partner.	1	Tolerance (monitoring)
3.	Support social inclusion processes and create spaces that promote inclusiveness and social cohesion.	Insufficient funds.	3	Countermeasures (analysis of needs, financial plans)
4.	Develop the intercultural nature of Krakow and build the "Open Krakow" brand.	A small number of competition applications for the "Krakow Ambassador of Multiculturalism" title	3	Countermeasures (promotion and information)
5.	Create a social platform to support the development of intercultural competencies among residents of Krakow.	Lack of interest in participating in training and educational activities	3	Countermeasures (promotion and information)
6.	Support groups at risk of social exclusion based on nationality, ethnicity, language, and religion, which includes implementation of response mechanisms to "racist" and xenophobic incidents.	Rise in hate speech in public spaces.	4	Countermeasures (intervention)

The risk may be assessed as:

CRITICAL RISK (score 7) – requires the management to respond as soon as possible, as the current state may lead to serious negative consequences – Taking measures should not be postponed SERIOUS RISK (score 5 or 6) – requires the management to respond, the manner in which the risk is countermeasured depends on the possibilities of personnel, finances, etc. Measures should be planned, but their deadlines do not have to be as expeditious as those above

MODERATE RISK (score 3 or 4) – it is recommended to counteract, especially where safety improvements are possible without significant expenditures. If the "risk owner" is willing to accept the risk, after it has been acknowledged, it is possible to postpone taking measures

Page 29 of 30

Appendix to Resolution XIV/357/24 of the City Council of Krakow of 20 November

LOW RISK (score 1 or 2) – does not require the management to respond, because the current state is satisfactory and ensures Risk response:

The risk owner indicates the optimal response to each identified significant risk. The following risk responses are assumed:

- (1) tolerance if the cost of effectively addressing a risk may exceed its potential benefits, the capacity to effectively counteract the risk is limited or beyond internal decisions and actions;
- (2) transfer refers to categories of risks for which there will be a transfer onto another institution, also through insurance or outsourcing;
- (3) withdrawal refers to a group of risks whose materiality could not have been decreased to an acceptable level, despite the measures taken;
- (4) counteraction refers to a risk category that will require decisive, deliberate, and planned actions which eliminate of significantly lower the risk.

Page 30 of 30