



STANDARDS OF PROTECTION OF MINORS IN HOTEL LOGOS

Preamble

Bearing in mind the legal obligation under the provisions of the act of 13 May 2016 on the prevention of sexual offences and protection of minors and the content of the United Nations Guiding Principles on Business and Human Rights, recognising the important role of business in ensuring respect for the rights of children, **Hotel Logos located in Kraków, ul. Szujskiego 5 ("Hotel Logos")** adopts the Standards for the Protection of Minors ("**SOM**", "**Standards**"). This document provides a set of rules and procedures to be applied in the event of suspected harm to a child staying at Hotel Logos and to prevent such harm, taking into account the situation of children with disabilities and children with special educational needs.

The Standards for the Protection of Minors at Hotel Logos are implemented on the basis of the following principles:

1. Hotel Logos conducts its operations with respect for the rights of children as vulnerable persons.
2. Hotel Logos recognises its role in running a socially responsible business and promoting desirable social attitudes.
3. Hotel Logos particularly emphasises the importance of the legal and social obligation to notify law enforcement authorities of any suspected offence against children and is committed to training its employees in this regard.

Glossary

For the purposes of this document, the following terms shall have these meanings:

1. **Tourist facilities:** hotel facilities and other facilities where hotel services are provided as specified in the act of 29 August 1997 on hotel services and services of tour operators and tourist guides.
2. **Child / minor:** for the purposes of these standards, a child is assumed to be any person under the age of 18.¹
3. **Guardian of the child:** the child's statutory representative, parent or guardian, foster parent, temporary guardian (i.e. a person authorised to represent a minor Ukrainian citizen who resides on the territory of the Republic of Poland unaccompanied by adults)².
4. **Stranger adult:** any person over the age of 18 who is not the child's parent or legal guardian.
5. **Harm to a child:** shall mean any conduct that may constitute the commission of a criminal act to the detriment of a child by any person, including an employee of the entity, or a threat to the welfare of a child, including neglect of a child; any intentional or unintentional act / omission of an individual, institution or society as a whole, and any result of such act or inaction that violates the rights, freedoms and/or personal rights of children or interferes with their optimal development.
6. **Forms of violence against the child:**
 - **Physical violence** against a child is violence as a result of which a child suffers actual physical harm or is potentially at risk of such harm. This harm occurs as a result of an action or inaction on the part of a parent or other person responsible for the child, or whom the child trusts or who has authority over the child. Physical violence against a child may be a repeated or one-off act.
 - **Psychological abuse against a child** is a chronic, non-physical, harmful interaction between a child and a caregiver, involving both actions and inactions. It includes, but is not limited to: emotional unavailability, emotional neglect, a relationship with the child based on hostility, blaming, vilification, rejection, developmentally inappropriate or inconsistent interactions with the child, failure to recognise or

¹ According to Polish law, a child is any person below the age of eighteen years (Article 1 of the Convention on the Rights of the Child, adopted by the United Nations General Assembly on 20 November 1989). A minor is a person who has not reached the age of majority, thus a person under the age of 18 or a woman who has reached the age of majority through marriage after the age of 16 (Article 10 § 1 and 2 of the Civil Code), which may take place with the authorisation of the guardianship court for important reasons and if the circumstances indicate that the marriage will be compatible with the good of the family to be founded (Article 10 § 1 of the Family and Guardianship Code).

² Parents - Article 98 of the Family and Guardianship Code; guardian - Article 155 of the Family and Guardianship Code; foster parent - Article 1121 of the Family and Guardianship Code; temporary guardian; Article 25 of the Law on Assistance to Ukrainian Citizens in Connection with Armed Conflict on the Territory of Ukraine.

acknowledge the child's individuality and psychological boundaries between parent and child.

- **Sexual exploitation of a child** is the involvement of a child in sexual activity that the child is not capable of fully understanding and giving informed consent to, or to which the child is not developmentally mature enough to consent to in a legally valid manner, or which is incompatible with the legal or moral norms of a particular social environment. Sexual exploitation occurs when such activity takes place between a child and an adult or a child and another child, if these persons, due to their age or stage of development, are in a relationship of care, dependence or authority. Sexual exploitation can also take the form of **sexual exploitation**, which is any actual or attempted abuse of a position of vulnerability, power advantage, or trust, for sexual purposes, including, but not limited to, profiting financially, socially or politically from the sexual exploitation of another person. A particular threat of sexual exploitation occurs during humanitarian crises. The threat of exploitation exists against both children and their caregivers (definition after UN Bulletin ST/SGB/2003/13).
 - **Child neglect** is the chronic or incidental failure to meet a child's basic physical and psychological needs or to respect his or her basic rights, resulting in disruption to his or her health or developmental difficulties. Neglect occurs in a child's relationship with a person who has a duty of care, nurture, concern and protection to the child.
7. **Offence against a child:** all offences that can be committed against adults and, in addition, offences that can only be committed against children (e.g. sexual exploitation under Article 200 of the Criminal Code³). Due to the nature of accommodation facilities, where seclusion can easily be obtained, the offences most likely to occur on their premises will be offences against sexual freedom and morality, in particular rape (Article 197 of the Criminal Code), sexual exploitation of insanity and helplessness (Article 198 of the Criminal Code), sexual exploitation of dependence or critical position (Article 199 of the Criminal Code), sexual exploitation of a person under 15 years of age (Article 200 of the Criminal Code), grooming (seduction of a minor by means of remote communication (Article 200a Criminal Code).
 8. **Other forms of child abuse** than the commission of a criminal offence against a child: any forms of violence used against a child that do not meet the characteristics of a criminal offence prosecuted by public prosecution (e.g. shouting, humiliation, tugging, name-calling, neglect of needs, etc.).
 9. **Employee** is a person employed under a contract of employment or performing work under a similar contract (e.g. commission, B2B, contract for specific work), as well as an intern, trainee, volunteer, etc.
 10. **Employee hired to work with children** is any person who performs tasks or is posted to perform tasks related to the upbringing, education, leisure, medical

³ Act of 6 June 1997 on the Criminal Code (consolidated text: Dz. U. z 2024 r., poz. 17).

treatment, provision of psychological counselling, spiritual development, sports or the pursuit of other interests by, or the care of, minors.

11. **Director of Logos Hotel:** the body / entity / person who manages a facility or chain of facilities and is responsible for the proper operation of the facility in terms of formalities.

CHAPTER I. FACILITY EMPLOYEES

General principles

1. Hotel Logos undertakes to educate its employees on circumstances indicating that a child on the premises may be abused and how to respond quickly and appropriately to such situations. The facility may provide the above education through various forms of training, e.g. external training, in-house training, e-learning, educational materials developed by the hotel and available to employees, educational materials available free of charge as developed by other organisations.
2. Each employee, before being allowed to work, is made aware of the SOM, which is confirmed by the employee's declaration and commitment to comply with the policies and procedures contained in this document. **Annex 1**
3. Employees working with children are subject to periodic training, which is documented by the employer.
4. Hotel Logos undertakes to take into account the situation of children with disabilities and children with special educational needs, adapting the guidelines in **Annex 12** to the specific nature and scope of the facility.

Recruiting people to work with children

1. Those working with children must demonstrate in their employment history that they have not harmed any children in the past.
2. It is compulsory to check the Sexual Offender Register for every person employed / posted by Hotel Logos to work with children. This also applies to employees who are minors, i.e. under 18 years of age. Checking a person on the Register is done by printing out the results of a search of the person on the Register with restricted access, and including the printout into the personal file of the person. The scope of personal data necessary to check for a person in the Register is set out in **Annex 3**.
3. In addition, each person recruited / posted to work with children must provide information from the National Criminal Register for the offences defined in Chapters XIX and XXV of the Criminal Code, in Articles 189a and 207 of the Criminal Code and in the act of 29 July 2005 on counteracting drug addiction (Dz. U. z 2023 r., poz. 172, and 2022 r., poz. 2600), or for the corresponding offences defined in foreign laws.
4. If the recruited / posted person has a non-Polish nationality, he/she should also submit the criminal record information of the country of which he/she is a national, obtained for the purposes of professional or voluntary activities

involving contact with children, or the criminal record information if the law of that country does not provide for the issuing of information for these purposes.

5. The recruited / posted person should also be required to make a declaration about the country / countries of residence in the last 20 years, other than the Republic of Poland and the country of citizenship, made under pain of criminal liability. **Annex 4**
6. If the law of the country from which the criminal record is to be submitted does not provide for the issuing of such information or does not require criminal records to be kept, the recruited / posted person shall make a declaration to this effect under penalty of criminal liability. **Annex 5**
7. The following declaration shall be made under penalty of criminal liability: "I am aware of the criminal liability for making a false statement." This declaration replaces the authority's notice on criminal liability for making a false declaration.
8. If external providers are used, the facility should include a provision in its contract with the provider to enforce an appropriate standard of screening by the provider of employees for their safety in relation to children. The provision will enable the facility to monitor compliance with the obligation on pain of immediate termination of the contract and a contractual penalty or other sanctions related to non-compliance with the contract in this regard.

Competencies and responsibilities for persons designated to implement the Standards for the Protection of Minors

1. Supervision of the application of the SOM is carried out by the Director of Hotel Logos.
2. The Director of Hotel Logos appoints the SOM Coordinator ("**Coordinator**").
3. The Coordinator is responsible for familiarising employees with the content of the SOM and monitoring their application at Hotel Logos.
4. The Coordinator shall organise and document a process of educating employees on how to recognise the signs that a child in the facility may be abused and how to respond promptly and appropriately to such situations, in accordance with the procedures adopted by the facility.
5. The Coordinator describes each intervention or reported incident of related to child abuse on the premises in a document that is created for this purpose (e.g. incident log or intervention register). The incident log or the intervention register kept by Hotel Logos is a set of Intervention Cards; a model Intervention Card is provided in **Annex 13**.
6. In the event of a reasonable suspicion that a crime has been committed, the Coordinator is responsible for securing evidence, including CCTV footage, and forwarding it to the public prosecutor or police if requested by the service, in the form of a copy by registered mail or in person.
7. The Coordinator is responsible for carrying out the procedure when there has been harm to a child by a member of the facility employees or other adult who is not directly employed by Hotel Logos but by a third party.

8. The Coordinator is responsible for monitoring and updating the SOM and its accessibility to employees, visitors and others working with the facility.
9. The Coordinator's details are available to all employees and visitors to the site, including children. The data must include information on how the Coordinator can be contacted (email address, telephone, availability: days and hours of work).

Principles for safe employee-child relations

1. All employees of Hotel Logos, including other adults who come into contact with children on the premises, are required to comply with the following rules if the contact is with the permission of the facility.
2. The guiding principle of all actions taken by employees in contact with children on the premises of Hotel Logos is to treat the child with respect and to take into account their dignity and needs.
3. It is unacceptable for employees or other adults to use violence in any form against a child.

A. Behaviour and practices expected of employees

- Be patient and respectful in your communication with your child.
- Listen carefully to the child and give him/her answers appropriate to his/her age and the situation. When communicating with the child, make best effort to keep your face at the level of the child's face.
- Assure your child that if he/she feels uncomfortable with a situation, he/she can talk to you or another designated person and get help.
- Inform the child where the SOMs are located in the facility in a version he/she understands. Assure him/her that if he/she has questions, he/she can approach you or another designated person.
- Respect the equal treatment of children regardless of their gender, sexual orientation, ability/disability, social, ethnic, cultural, religious and worldview status.
- Ensure a safe space. If there are children in the area where you are working, make sure that equipment and supplies are used as intended and that the environment is safe (pay attention to window and stair protection, limited access to busy roads, open water, etc.).
- If you see a child/children left unattended and the situation may indicate a risk to the child's safety, take action to find the parent/carer.

B. Unacceptable behaviour and practices by employees towards children in the facility

- Employees must not shout at, shame, humiliate, disrespect or insult children.
- Employees must not hit, poke, push or in any way violate the physical integrity of children unless there is a threat to the child's health or life.
- Employees must not enter into any romantic or sexual relationship with children or make inappropriate proposals to them. This includes sexual comments, jokes, gestures and the sharing of erotic and pornographic content with children, in any form.

- Employees must not record children's images for private or business purposes (recording, photographing) without the consent of the parents / guardians and without the consent of the child. This also applies to third parties recording images of children. An exception is if the child's image is only a detail of a larger scene, such as a gathering, landscape, public event, in which case the consent of the child's parent / guardian is not required.
- Employees must not make contact with children through private communication channels (private phone, email, instant messaging, social media profiles) and must not meet children outside the workplace.
- Employees must not offer alcohol, tobacco products or illegal substances to children.
- Employees must not touch children if they don't want this to be done, or in a way that could be considered indecent or inappropriate.

If you witness any of the above behaviours or situations with other adults or children, always inform the person responsible in the facility for the implementation and monitoring of the SOM or your immediate supervisor: Director of Logos Hotel, biuro@hotel-logos.pl

CHAPTER II. PROCEDURE FOR IDENTIFYING THE CHILD WHEN REGISTERING AT THE RECEPTION DESK

1. One way to effectively prevent child abuse is to establish the identity of the child in the facility and their relationship to the adult with whom they are in the facility.
2. The reception employee shall take all possible steps to identify the child and their relationship with the adult who accompanies the child.
3. In order to identify the child and their relationship to the person with whom they are in the facility, it is necessary to:
 - a. Ask for the child's identity card or other document proving that an adult has custody of the child. Examples of documents that can be used for identification are: identity card, school ID card, MObywatel application, Internetowe Konto Pacjenta [*Internet Patient Account*], court decision. If no identity document is available or presenting it is refused, ask for the child's details (name, address, PESEL number).
 - b. In the absence of documents indicating the relations between the child and the adult or refusal to produce them, the adult and the child should be asked about it. An example of an adult and child interview is provided in **Annex 2**.
 - c. If the adult is not the child's parent or legal guardian, they should be asked to produce a document, e.g. a notarised parental consent for the person to travel with the child or a consent signed by the child's parent, stating the child's details, address, phone contact for the parent and the identity document/PESEL number of the person to whom the parent has entrusted custody of the child.

If the adult does not have any of the above documents, they should be asked to complete a declaration to this effect, according to a model prepared by the facility. The statement should include details of the

child and the adult with whom the child is staying, with a statement of the relations between the child and the adult. Where the adult is not the child's parent or legal guardian, they should declare that the parents / legal guardians have agreed to care for the child. A model statement is attached as **Annex 14** (the model statement of an adult arriving at Hotel Logos and having no document confirming the custody of the child with whom he/she is arriving at the Hotel).

4. If an adult refuses to show the child's document or to declare the relations, explain that the procedure is for the safety of children using Hotel Logos and that, in accordance with the provisions of the act of 13 May 2016, employees at the facility must comply with the legislation on child rights. Once the matter has been clarified in a positive manner, you should thank for the time taken to ensure that the child is well looked after.
5. If the conversation does not clear up any doubts about the suspicions about the adult and intentions to harm the child, particularly if the adult refuses to show ID or the child does not have ID and refuses to make a written statement, this should be discreetly communicated to the supervisor and the security (if they are on the premises at the time) in such a way as not to arouse suspicion (for example, you could refer to the need to use the equipment at the back of reception, asking the adult to wait with the child in the lobby, restaurant or elsewhere).
6. From the moment the first concerns arise, both the child and the adult should be within sight of an employee at the facility, if possible, and should not be left alone.
7. The supervisor who has been alerted to the situation takes over the conversation with the adult for further clarification.
8. If the conversation confirms the belief that an attempt or a crime has been committed against the child, the supervisor shall notify the police. Further, the procedure is followed as in the case of circumstances indicating harm to the child (see Chapter III).
9. If unusual or suspicious situations are witnessed by employees of other departments (e.g. cleaning service, room service, bar and restaurant staff, relaxation area, security and others), they should immediately notify their supervisor or, in his/her absence, a decision maker, who will take appropriate action (see points 7 and 8 above).
10. Depending on the situation and the location, the supervisor verifies to what extent the suspicion of child abuse is justified. To this end, he/she selects appropriate measures leading to clarification of the situation or decides to intervene and notifies the police.

CHAPTER III. PROCEDURE IN THE EVENT OF CIRCUMSTANCES INDICATING THAT A CHILD HAS BEEN ABUSED BY AN ADULT

1. Reasonable suspicion of child abuse occurs when:
 - a. The child has disclosed the fact of abuse to an employee at the facility,

- b. An employee observed harm,
 - c. The child shows signs of abuse (e.g. scratches, bruises) and, when questioned, responds incoherently or chaotically or becomes confused or there are other circumstances that may indicate abuse, e.g. child pornography found in an adult's room.
2. An employee who has a reasonable suspicion that a child on the premises is being or has been harmed should immediately notify a supervisor / decision maker who will call the police. In the event of an existing threat to the safety of a child, an employee who has a reasonable suspicion that a child is being harmed shall immediately notify the police by calling 112 and shall describe the circumstances of the incident. Notwithstanding the above, the employee shall notify Hotel Logos Coordinator of the incident.
 3. Efforts should be made to make it difficult or even impossible for the child and the person suspected of child abuse to leave the premises.
 4. In the case specified in the Code of Criminal Procedure, a civil detention of a suspected person may be carried out⁴. In such a situation, until the arrival of the police, the detained person remains under the supervision of security personnel or other hotel employees, who can carry out such actions without endangering their health or life.
 5. In all cases, care should be taken to ensure the child's safety. The child, if possible, should be in the care of an employee until the police arrive. Where possible, attempts should be made to support the child. **Annex 10**
 6. If there is a reasonable suspicion that a crime has been committed involving the child's contact with the perpetrator's biological material (sperm, saliva, epidermis), the child should, if possible, be prevented from washing and eating / drinking until the police arrive. Explain to the child why such restrictions have been applied to him/her.
 7. Once the child has been taken over by the police, the CCTV footage and other relevant evidence (e.g. documents) relating to the incident should be secured and forwarded to the Coordinator, who will forward a copy by registered post or in person to the prosecutor or the police if requested by the service.
 8. After the intervention, the incident should be reported to the Coordinator, who describes it in the incident log or other document intended for this purpose.

⁴ Article 243 [Arrest] of the Act of 6 June 1997 Code of Criminal Procedure (consolidated text: Dz. U. z 2024 r., poz. 37).

§ 1. Every person is entitled to arrest a person in the act of committing an offence or in pursuit undertaken directly after the offence was committed, if there is a risk of that the offender might go into hiding or when it is not possible to establish his identity.

§ 2. The arrested person should be immediately surrendered to the Police.

CHAPTER IV. PROCEDURE IN THE EVENT OF SUSPECTED OR ESTABLISHED ABUSE OF A CHILD BY AN EMPLOYEE OR ANOTHER ADULT

1. In the event of suspected child abuse by an employee or other adult who is not directly employed by Hotel Logos but by a third party, the person who becomes aware of the information should immediately inform the Coordinator or, in the absence of the Coordinator, another person designated for this purpose.
2. If a child's life or health is at risk, the person who becomes aware of this should immediately notify the police by calling the emergency number 112, giving their own details, the child's details (if possible), the child's whereabouts and a description of the circumstances of the case, and inform the supervisor / decision maker, who notifies the child's carers / parents. The person who becomes aware of the incident also informs the Coordinator, by email / in writing as a minimum.
3. Where an employee has perpetrated a form of abuse against a child other than committing an offence against the child, the Coordinator, once informed, should investigate all the circumstances of the case, in particular by listening to the employee suspected of abuse and other witnesses to the incident. Where the violation of a child's welfare is significant, in particular where there has been discrimination or a violation of a child's dignity, the Coordinator should recommend to the person in charge of the facility appropriate personnel action in relation to that employee.
4. If the offender is not directly employed by Logos Hotel but by a third party (e.g. outsourcing), a recommendation should be made to prohibit him/her from entering Logos Hotel premises and, if necessary, to terminate the contract with the third party.

CHAPTER V. PROCEDURE IN THE EVENT OF OTHER FORMS OF VIOLENCE AGAINST A CHILD BY A PARENT / LEGAL GUARDIAN OR OTHER ADULT

1. If a child is found to be abused by a parent / legal guardian or other adult with whom the child is on the premises, any employee who witnesses such abuse should respond strongly.
2. If a child's life or health is at risk, the person who becomes aware of this should immediately inform the police by calling the emergency number 112, giving their own details, the child's details (if possible), the child's whereabouts and a description of the circumstances of the case and inform the supervisor / decision maker. The person who becomes aware of the incident shall also inform the Coordinator, by email / in writing as a minimum.
3. If an employee at a facility witnesses physical violence against a child (spanking, tugging, shouting, others listed in the definition of physical violence), they should try to stop the abuse and respond. Possible forms and ways to respond to abusive behaviour by a parent / carer / other adult towards a child are provided in **Annex 11**.

4. In a situation where a child under the age of 7 is left unattended, the employee who has become aware of it should notify a superior. The supervisor who has been informed of the situation shall decide on the further course of action, taking into account the circumstances and having regard to the context of the provisions of the Criminal Code and the Code of Offences⁵. Depending on this, the supervisor shall attempt to locate the parent / legal guardian or other adult with whom the child is on the premises and explain that they cannot leave the child unattended. Where it is not possible to locate the parent / legal guardian or other adult with whom the child is on the premises, or the parent / legal guardian / other adult is unwilling or unable to take charge of the child, the supervisor shall notify the police. In all cases, the safety of the child must be ensured.

CHAPTER VI: MONITORING AND EVALUATION OF THE STANDARDS FOR THE PROTECTION OF MINORS

1. The Director of Hotel Logos shall appoint a Coordinator responsible for the Standards for the Protection of Minors applied at Hotel Logos and shall post his/her contact details in a place easily accessible to employees and guests of the hotel, including children.
2. The Director of Hotel Logos defines the tasks and competences of the Coordinator with regard to the preparation of employees for the application of the provisions of the SOM, the rules for preparing employees for their application and the way in which these activities are documented.
3. The Coordinator referred to in the preceding paragraph shall monitor and evaluate the SOM once every two years.
4. Monitoring and evaluation involves verifying the implementation of the Standards, responding to signals of breaches of rules and procedures and proposing changes to the document, particularly with a view to adapting it to current needs and complying with current legislation.

⁵ Criminal Code Article 160 § 1 and 2 [Exposure to danger]:

§ 1. Anyone who exposes a person to an imminent danger of loss of life, a grievous bodily harm, or a serious impairment to health shall be liable to imprisonment for a maximum term of 3 years.

§ 2. If the offender has a duty to take care of the person exposed to danger, he or she shall be liable to imprisonment for a term going between 3 months and 5 years.

Article 210 § 1 [Abandonment].

§ 1. Anyone who, in breach of a duty to take care of a person under the age of 15, or a person who is vulnerable because of his or her mental or physical condition, abandons such person shall be liable to imprisonment for a term going between 3 months and 5 years.

Code of Offences Article 106 [Allowing to be in danger]:

Anyone, having the duty of care or supervision of a minor under 7 years of age or of another person incapable of recognising or defending himself or herself from danger, allows him or her to be in circumstances dangerous to human health, shall be punished by a fine or a reprimand.

5. The Coordinator shall conduct a survey among the employees of Hotel Logos, once every 2 years, to monitor the level of implementation of the SOM. A sample survey is attached as **Annex 6**.
6. In the survey, employees can suggest changes and indicate violations of SOM policies and procedures at the facility.
7. The Coordinator processes the questionnaires filled in by the employees, draws up a monitoring report on this basis and forwards it to the entrepreneur. The Director of Hotel Logos makes the necessary changes to the document and announces the new wording of the Standards for the Protection of Minors to the employees.

Final provisions

1. The Standards for the Protection of Minors come into force on 15 August 2024.
2. The Standards for the Protection of Minors are made available to all employees by posting them on Hotel Logos website and at Hotel Logos reception desk.
3. The Standards for the Protection of Minors are made available to guests by posting them on Hotel Logos website and at Hotel Logos reception desk.
4. The Standards for the Protection of Minors are made available in an understandable and abbreviated version for children staying at Hotel Logos, in a place accessible to them.