

## STANDARDS FOR THE PROTECTION OF MINORS

[version valid from February 15, 2024 with subsequent updates]

### Legal act:

Articles 22b and 22c of the Act of 13 May 2016 on counteracting threats of sexual crime (Journal of Laws of 2023, item 1304, as amended) and Act of July 28, 2023 amending the Family and Guardianship Code and certain other acts (Journal of Laws, item 1606), Point 3, Chapter 4b of the Act - hereinafter referred to as the Act.

The Management Board of Europajska VII Sp. z o. o. z/s in Czeladź, the Owner of Hotel Szafran in Czeladź - hereinafter referred to as Hotel Szafran - introduces this document entitled "**Standards for the Protection of Minors**", which, in accordance with the Act, aim to raise the standards of safety and protection of minors in all places where they stay at the Szafran Hotel.

**The Standards for the Protection of Minors are available on the website [www.hotelszafran.pl](http://www.hotelszafran.pl),**

at the reception desk of the Szafran Hotel, as an Annex to the Hotel Szafran Regulations in each room and in all operational departments of the Szafran Hotel.

### I. Preliminary provisions

Bearing in mind the content of the United Nations Business Guidelines and human rights, recognizing the important role of business in ensuring respect for children's rights, in particular the right to protect their dignity and freedom from all forms of harm, the Szafran Hotel in Czeladź adopts this document, hereinafter referred to as the Standards, **as a model of rules and procedures** in the event of a suspicion that a child staying at Szafran Hotel is in any sort of danger, and how to prevent such threats.

We will implement the policy of protecting minors in our hotel through the following rules:

1. Hotel Szafran in Czeladź conducts its operations with the highest respect for human rights, in particular the rights of children as people who are particularly sensitive to harm.
2. Hotel Szafran in Czeladź particularly emphasizes the importance of the legal and social obligation to notify law enforcement authorities of any suspected crime committed against children and undertakes to train its staff in this respect.
3. Hotel Szafran in Czeladź undertakes to educate the staff about circumstances indicating that a child staying at the facility may be harmed and on how to respond quickly and appropriately to such situations.
4. As part of known good practices, Hotel Szafran has placed signs at the Reception Desk and other places visible to all Hotel Guests with information that the facility cares about the safety of children and applies appropriate Minor Protection Standards.

5. Hotel Szafran sends a message to guests along with the booking confirmation that, due to the Standards for the Protection of Minors, it requires an adult staying at the facility with a child to have a document proving that he or she is an adult with the right to care for the child.

6. All persons employed by Hotel Szafran in Czeladź - regardless of the basis of employment (employment contract, civil law contract, cooperation agreement, internship contract, etc.) - are obliged to apply the provisions of these Standards. Europajska VII has the right to request the above-mentioned persons to confirm in writing their commitment to apply the principles provided for in these Standards.

## **II. Explanation of terms:**

For the purposes of this document, the meaning of the following terms has been clarified:

1. Standards - this document entitled: "Standards for the Protection of Minors"
2. Company Management Board - persons who are currently members of the Management Board of Europajska VII, the owner of the Szafran Hotel in Czeladź
3. Hotel Szafran – facility located at ul. Będzińska 82, 41-250 Czeladź
4. Hotel Director – a person managing the Szafran Hotel on behalf of the Company's Management Board
5. Staff – a person employed by Spółka Europajska VII, the Owner of the Szafran Hotel
6. Minor - any person under 18 years of age.
7. Legal Guardian – parent or legal representative of the child who is not a parent, appointed in accordance with applicable law
8. Stranger - any person over 18 years of age who is not the child's parent or legal guardian.
9. Harming a child - committing a crime to its detriment.
10. Crime against a child - all crimes that can be committed against adults have been committed, and additionally crimes that can only be committed against children (e.g. sexual abuse under Article 200 of the Penal Code). Due to the specific nature of tourist facilities, where isolation can be easily obtained, the crimes that are most likely to occur will be the crimes against sexual freedom and decency, in particular rape (Article 197 of the Penal Code), sexual abuse of insanity and helplessness ( Art. 198 of the Penal Code), sexual exploitation of a dependent or critical position (Art. 199 of the Penal Code), sexual exploitation of a person under 15 years of age (Art. 200 of the Penal Code), grooming (seduction minor by means of distance communication - Art. 200a of the Penal Code).
11. An employee employed to work with children who should be checked in the Register of Sexual Offenders is any person employed to perform this type of duties, including a person employed under a civil law contract, an apprentice, an intern and a volunteer, regardless of citizenship and the person's age.
12. Intervention Card - a document according to the template established by the Hotel Director, prepared in each case of detection of Child Abuse - Annex No. 1

13. Intervention Register - a register kept by the Hotel Manager or a person designated by him, in which cases of intervention in connection with the detection of Child Abuse are documented.

### **III. GENERAL RULES**

1. Each Guest of the Szafran Hotel, including a Child, should be treated with due respect and dignity. Any behavior that may violate this rule is prohibited.
2. Staff should respond in the event of child abuse or when there is a reasonable suspicion that child abuse is occurring.
3. One of the forms of effective prevention of Child Abuse is the identification of the Child staying at the Szafran Hotel and his relationship with the adult with whom he is staying at the Szafran Hotel. The Hotel staff takes all possible steps to identify the child and his relationship with the adult with whom he is staying at the Hotel.
4. Every person, including a child, has the right to report the suspicion or fact of child abuse to the staff of Hotel Szafran and has the right to expect an appropriate reaction from the staff.

### **IV. RULES ensuring safe relations between Hotel Szafran Staff and Minors, in particular prohibited behavior towards Minors**

1. The Manager of Hotel Szafran will make every effort to ensure that the Staff of Hotel Szafran who has contact with Minors staying at the Hotel are aware of their obligations in this respect and are able to ensure safe relationships between them and the Minors.
2. These Standards are implemented by familiarizing all currently employed persons constituting the Szafran Hotel Staff with the content of these Standards
3. Before starting work, each newly employed person should be informed about these Standards and is obliged to read them.
4. The Szafran Hotel staff should not allow a Minor to remain in a room alone with them, except in situations when leaving the Minor alone in the room could significantly threaten his or her well-being, in particular health or life. If possible, you should ensure the presence of another adult, supervision by CCTV cameras, and plan your work duties in such a way that you can return to them when this type of situation has passed.
5. Any contacts between the Hotel staff and the Minor staying at the Szafran Hotel should not go beyond interactions justified by the official duties of the Hotel Staff.

### **V. RULES AND PROCEDURES for identifying the Minor and his relationship with the adult with whom he arrives at the Hotel**

1. The hotel staff, relying on the provisions of the Act and the requirements arising from these Standards, are obliged to identify the child and establish his or her relationship with the adult with whom he or she is staying at the Hotel. Such identification is based on the documents of the Minor

and the adult with whom he is staying at the Hotel, and if they are not available, on the basis of a conversation with the adult and the Minor.

2. To identify the Minor and his relationship with the person with whom he is staying at the Facility, you should:

a) Ask about the Minor's identity and the Minor's relationship with the person with whom he came to the Hotel or is staying there. For this purpose, you may ask for the Minor's identity document or another document confirming that an adult has the right to care for the Minor at the Hotel. List of sample documents: e.g.

= identity document of the Minor indicating relationship,

= civil status certificate,

= court decision,

= notarial consent of the parent for a given person to travel with the Minor

= consent signed by the parent of the Minor, including the child's data, address of residence, telephone contact number of the parent and ID number / PESEL number of the person to whom the parent entrusted the care of the Minor.

If you do not have an ID document, you may ask for the Minor's data (name, surname, address, PESEL number)

b) If there are no documents indicating the relationship between the Minor and the adult, ask the adult and the Minor about this relationship.

c) If the adult is not the parent or legal guardian of the Minor, ask whether he or she has a document confirming the parents' consent to the joint trip of the adult with the Minor (e.g. a written declaration).

d) If an adult does not have a parental consent document, please ask for the telephone number of the above-mentioned persons to call and confirm that the Minor is staying at the Facility with a foreign adult with the knowledge and consent of the parents/legal guardians.

3. In the event of an adult's resistance to presenting the Minor's document or indicating the relationship, it should be explained that the procedure serves to ensure the safety of Minors using the Hotel and was developed in consultation with non-governmental organizations operating in this field.

4. After clarifying the matter in a positive manner, you should thank them for the time spent making sure that the Minor is well cared for and emphasize once again that the procedure is intended to ensure the safety of the Minor Children.

5. **If the conversation does not dispel doubts** regarding the suspicion of the adult and his intention to harm the Child, you should discreetly notify your supervisor and security staff (if they are on the premises at that time).

6. During a conversation with the Minor, special attention should be paid to ensure that the Minor has the opportunity to speak freely and unrestrained, in particular that the adult with whom the

Minor arrives at the Hotel does not answer questions asked to the Minor. If the adult in any way hinders contact with the Minor or puts pressure on him or her, the adult should be asked to leave the room while the conversation is taking place with the Minor, and an additional Hotel employee should be asked to be present during the conversation.

7. From the moment the first doubts arose, both the Minor and the adult should be under constant observation by the Staff and not be left alone.

8. The superior who has been notified about the situation decides to notify the police or, in case of doubt, takes over the conversation with the suspected adult in order to obtain further explanations.

9. If the conversation confirms the conviction of an attempt or commission of a crime to the detriment of the Minor, the superior notifies the police of this fact. The procedure is further applied in the event of circumstances indicating harm to a Minor.

10. If unusual or suspicious situations are witnessed by employees of other departments of the Hotel, e.g. cleaning service, room service, bar and restaurant employees, relaxation zone employees, security staff, etc., they should immediately notify their superior, who will decide to take appropriate actions.

11. For the sake of all users of the facility, the staff may request access to the room in any situation that requires it

12. Depending on the situation and place, the superior verifies to what extent the suspicion of harm to the Minor is justified. For this purpose, it selects appropriate measures to clarify the situation or decides to intervene and notifies the police.

## **VI. POLICIES AND PROCEDURES IN THE CASE OF CIRCUMSTANCES INDICATING CHILD ABUSE**

1. If there is a justified suspicion that a minor staying in the facility is being harmed, appropriate actions should be taken immediately: notify the police by calling 112 and describing the circumstances of the incident. Depending on the dynamics of the situation and circumstances, the call is made by a person who is a direct witness of the event (employee/supervisor). If the notifying party is an employee, he or she also informs his or her superior or the Hotel Director directly about the event

2. Reasonable suspicion of Child Abuse occurs when:

a) The child disclosed the fact of abuse to a Staff Member,

b) A Staff Member observed harm to the Child,

c) The child shows signs of abuse (e.g. scratches, bruises), and when asked answers incoherently or chaotically, or becomes embarrassed, or there are other circumstances that may indicate abuse, e.g. finding pornographic materials involving children in an adult's room.

3. In this situation, the Minor and the person suspected of harming the Minor should be prevented from leaving the Facility.

4. In justified cases, the Staff may arrest a suspected person. Here, the actions of the Hotel Staff should remain within the limits of the law and taking into account their own safety and the safety of the Minor.

5. In such a situation, until the police arrive, the person should be kept under the supervision of two employees in a separate room away from the view of other guests.
6. In each case, care should be taken to ensure the safety of the Minor, who should remain under the care of the Staff until the arrival of the Police.
7. In the event of a justified suspicion that a crime has been committed involving the Minor's contact with the perpetrator's biological material (sperm, saliva, epidermis), if possible, the Minor should not be allowed to wash or eat/drink until the Police arrive.
8. After receiving the Minor by the Police, the monitoring material and other relevant evidence (e.g. documents) regarding the event should be secured and, at the request of the services, a copy should be delivered by registered mail or in person to the prosecutor or the Police.
9. Each Staff Member participating in the intervention prepares a memo describing the circumstances of the event.

#### **VII. DOCUMENTATION AND CONFIDENTIALITY**

1. After the intervention carried out in accordance with point VI above, the event should be described in the Intervention Card, the template of which is attached as Appendix 1. Intervention Cards are collected in the Intervention Register kept by the Hotel Director
2. Intervention documentation is kept in a manner that ensures confidentiality for a period no longer than required by applicable law.
3. All persons who, in connection with the performance of their official duties, received information about child abuse or information related to it, are obliged to keep this information secret, with the exception of information provided to authorized Hotel Staff and authorized Institutions as part of intervention activities.

#### **VIII. FINAL PROVISIONS**

1. The person responsible for preparing the Staff to apply the Standards is the Hotel Manager.
2. The Standards will be assessed at least once every two years to ensure adaptation to current needs and compliance with applicable regulations.