



**At Airport Hotel Okęcie facility owned by KONCEPT 2000+ Spółka z o.o. Spółka Komandytowa (Limited Liability Company, Limited Partnership) with its seat in Warsaw (02-148) at 24 Komitet Obrony Robotników Street**

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# CHILD PROTECTION STANDARDS

## *Airport Hotel Okęcie*

### **Preamble**

Whereas:

- the obligation under the Act of 13 May 2016 on the prevention of the threat of sexual offences and the protection of minors<sup>1</sup>
- the content of the United Nations Guidelines concerning business and human rights, recognising the important role of business in ensuring respect for children's rights, Airport Hotel Okęcie

adopts the **Child Protection Standards**.

The Child Protection Standards at Airport Hotel Okęcie are implemented based on the following

principles:

1. Airport Hotel Okęcie conducts its operations with respect for the rights of children, who, due to their age, emotional and psychological state, are particularly vulnerable to harm.
2. Airport Hotel Okęcie recognises its role in doing business which is socially responsible and promoting desirable social attitudes.
3. Airport Hotel Okęcie recognises the importance of the legal and social obligation to notify law enforcement authorities of any case of abuse, suspicion of committing a crime to the detriment of a child and is bound to train its employees to be competent to fulfil this obligation.

### **Glossary**

For the purposes of this document, the following terms are given the following meaning:

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<sup>1</sup> Journal of Laws of 2023,

1. **Tourist facilities** – hotel facilities and other facilities where hotel services specified in the Act of 29 August 1997 on hotel services and services of tour operators and tour guides are provided<sup>2</sup>.
2. **Child/minor** - for the purposes of these standards it is assumed that a child is any person under the age of 18.
3. **Guardian of the child** – a legal representative of a child: parent or guardian; foster parent; temporary guardian (i.e. a person authorised to represent a minor Ukrainian citizen who stays in the territory of the Republic of Poland unaccompanied by adults)
4. **A stranger adult** is any person over the age of 18 who is not the child's guardian, as defined in par. 3.
5. **Child abuse** - Child abuse - child abuse is any behaviour towards a child that constitutes a forbidden act against them. In addition to the above, child abuse involves negligence (intentional or unintentional), an act or omission, as well as any result thereof, which has the effect of violating the rights, freedom, personal rights of the child and interfering with the child's development.

The following basic forms of abuse can be distinguished:

Physical violence against a child. It is a single or repeated act or omission as a result of which a child suffers actual physical abuse or is potentially at risk of such abuse. Abuse is the result of an act or omission on the part of a parent, guardian, person responsible for the child, with authority over the child or whom the child trusts.

Psychological violence against a child. It is a prolonged, non-physical, harmful interaction between a child and someone responsible for them or someone trusted by the child. As with physical violence, it includes both actions and omissions. Some of the manifestations of psychological violence involve:

- emotional unavailability;
- emotional neglect;

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<sup>2</sup> Journal of Laws of 2023,

- a relationship with a child based on hostility, blaming, denigration, rejection;
- developmentally inappropriate or inconsistent interactions with a child;
- failing to recognise or acknowledge the individuality of a child;
- failure to recognise or acknowledge the psychological boundaries between the child and the person in charge;
- inadequate socialisation, demoralisation;
- situations in which the child witnesses violence;

Sexual violence against a child (child sexual abuse). It is the involvement of a child through an adult or another child in sexual activity. It refers to situations where there is no physical contact (e.g. exhibitionism, verbal harassment - e.g. having conversations with sexual content inappropriate to the age of the child, making sexual comments about the child's appearance and behaviour, encouraging contact with pornographic content, grooming - non-sexual seducing strategies with the intention of having sexual contact in the future) and when there is contact (situations such as touching the child, sexual intercourse, forcing the child to touch the offender's body). Any sexual activity undertaken with a child before the age of 15 is a crime. In the case of children, we speak of sexual abuse when there is a relationship of power, care or dependence between the abuser (an adult, another child) and the abused (a child) due to age or developmental stage. Another form of child sexual abuse includes sexual exploitation. It is any: actual or attempted abuse of child's vulnerability, power advantage or trust - for sexual purposes. Sexual exploitation includes (although not necessarily) profiting financially, socially or politically from sexual exploitation. A particular threat of sexual exploitation occurs during humanitarian crises. The threat of sexual exploitation affects both the children themselves and the guardians of these children who may fall victim to exploitation.

Child neglect. It is the chronic or incidental failure to meet child's physical and psychological needs. It can take the form of not respecting the child's rights, resulting in disruption to the child's health and/or development. Child neglect occurs in a child's relationship with a person with a duty of care, upbringing, concern and protection.

Peer violence (peer bullying, bullying). Peer violence occurs when a child experiences various forms of bullying from peers. It refers to face-to-face activities or those using communication technologies (e.g. via the Internet and mobile phones). Peer violence is observed when a harmful action is intended to cause unpleasantness or harm to someone (intentionality), is systematic (repetition) and the victim is weaker than the perpetrator or group of perpetrators. It includes:

- verbal violence (e.g. name-calling, teasing, ridiculing);
- relational violence (e.g. exclusion from the group, ignoring, setting others against the person, blackmailing);
- physical violence (e.g. beating, kicking, pushing, pulling);
- material violence (e.g. theft, destruction of objects);
- cyberbullying/electronic harassment (e.g. malicious instant messaging, posting on a social networking site, posting pictures or videos ridiculing the victim online);
- sexual exploitation - touching intimate parts of the body or being forced to have sexual intercourse or other sexual activities by a peer,
- violence conditioned by gender norms and stereotypes (e.g. violence in romantic relationships between peers).

6. **Offence against a child** – the Criminal Code in principle contains a catalogue of forbidden acts that can be committed against adults and children. In addition, it provides for forbidden acts which are

applicable when they are committed to the detriment of a minor, including also a minor under 15 years of age<sup>3</sup>).

7. **An employee** is a person employed under an employment contract or performing work under a similar contract (e.g. contract of mandate, B2B, contract for specific work), as well as trainee, apprentice, volunteer, etc.
8. **An employee working with children** is any person whose **actual duties** are related to the upbringing, education, leisure, medical treatment, provision of psychological counselling, spiritual development, sports or the pursuit of other interests by minors, or to the care of minors.
9. **Entrepreneur or farmer** – the body/entity/person who manages a tourist site or network of sites and who is responsible for the proper formal operation of the site.

## **Section I Employees of the Facility**

### General rules

1. Airport Hotel Okęcie educates its employees to ensure that they are able to recognise the signs/symptoms of child abuse and to respond quickly and appropriately to abusive situations.
2. Each employee, before being allowed to work, shall familiarise himself/herself with the Child Protection Standards, which he/she shall confirm by making a statement to this effect. At the same time, such an employee makes a commitment to comply with the principles and procedures contained in the Standards.
3. Airport Hotel Okęcie takes into account the situation of children with disabilities and children with special educational needs.

<sup>3</sup> Act of 6 June 1997 on the Criminal Code (Journal of Laws of 2024, item 17)

### Recruiting people to work with children

Before a person is employed or referred to work with children<sup>4</sup> it is established whether he or she has a history of child abuse. Arrangements are made in accordance with Article 21 of the Act on Prevention of Sexual Offences and Protection of Minors.

1. Airport Hotel Okęcie provides apprenticeships for students of schools training adepts to work in the HORECA sector.
2. The Apprenticeship Supervisor is subject to verification and has been checked by the employer in the Sex Offender Register.
3. The Hotel does not identify jobs other than those listed in par. 2 related to the upbringing, education, leisure, treatment, provision of psychological counselling, spiritual development, sports or the pursuit of other interests by minors, or related to the care of minors.

### Terms of reference for persons designated to implement the Child Protection Standards at Airport Hotel Okęcie

1. The supervision over the application of the Child Protection Standards is carried out by the Hotel Director representing the Company.
2. The Director shall appoint a Child Protection Standards Coordinator (hereinafter referred to as the "Coordinator").
3. The Coordinator is the person responsible for familiarising the employees with the content of the Child Protection Standards and monitoring its application at Airport Hotel Okęcie.
4. The Coordinator shall organise and document the process of educating the employees on how to recognise the signs that a child in the facility may be abused and how to respond quickly and appropriately to such situations, in accordance with the procedures adopted by the facility.

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<sup>4</sup> Within the meaning of Article 21 of the Act on the Protection of Minors



5. the Coordinator shall describe each intervention or reported child abuse incident in the premises in a document that is created for this purpose (e.g. an incident log or intervention register).
6. In the event of a justified suspicion that a crime has been committed, the Coordinator is responsible for securing the evidence (including surveillance footage) and hand it over at the request of the services  
in the form of a copy by registered post or in person to the public prosecutor or the police.
7. The Coordinator is responsible for carrying out the procedure in situations when a child has been abused by the employee of the facility or another adult who is not directly employed by Airport Hotel Okęcie but by a third party.
8. The Coordinator is responsible for monitoring and updating the Child Protection Standards and making them available to both employees and other entities cooperating with the facility and visitors.
9. The Coordinator's details are available to all the employees, associates and external entities cooperating with the facility.
10. If the guest of the facility needs to contact the Coordinator, the contact is made by the hotel reception.

#### Principles for a safe employee-child relationship

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

#### Behaviours and practices expected of employees

1. Be patient and respectful in your communication with a child.

2. Listen carefully to the child and give them answers appropriate to their age and a situation. When communicating with a child, try to keep your face level with the child's face.
3. Assure a child that if they are uncomfortable with any situation and needs help, they can tell you or another designated person about this and get help.
4. Inform a child where the Child Protection Standards are located at the Airport Hotel Okęcie in a version they can understand. Assure a child that if they have any questions they can come to you or another designated person.
5. Treat children equally, regardless of any characteristics, including their gender, sexual orientation, ability/disability, social, ethnic, cultural, religious status and worldview.
6. Ensure a safe space. If in the area in which you work there are children present, make sure that the equipment and facilities are used as intended and that the surroundings are safe (pay attention to window and stair protection, restricted access to busy roads, open water, etc.).
7. 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/guardian.
8. If the child/children are to be left without parents or guardians in the company of the Hotel employees, this is always done with a minimum of two employees.

*Unacceptable behaviour and practices by employees towards children at the facility*

1. You must not shout, shame, humiliate, disrespect or insult a child.
2. You must not hit, poke, push or in any way violate a child's physical integrity unless there is a threat to a child's health or life.
3. You must not enter into any romantic or sexual relationship with a child or make inappropriate proposals to them. This also includes

sexually explicit comments, jokes, gestures and the sharing of erotic and pornographic content with children in any form whatsoever.

4. You are not allowed to capture a child's image for private or business purposes (recording, photographing) without the consent of the child's parents/guardians and the child's consent. This also includes allowing third parties to capture the images of children. The exception is when the image of a child is only a detail of a whole, such as a gathering, landscape, public event - in which case the consent of the child's parent/guardian is not required.
5. You must not make contact with a child through private communication channels (private phone, email, instant messaging, social media profiles) or meet a child outside the workplace.
6. You must not offer a child any alcohol, tobacco products or illegal substances.
7. Never touch a child if they do not want you to, or in a way that may be deemed indecent or inappropriate.

If you witness any of the above described behaviours and/or situations by other adults or children, always inform the Coordinator or immediate supervisor.

## **Section II.**

### **Procedure for identifying a child during registration at reception**

One way to effectively prevent child abuse is to establish the identity of a child staying at the tourist facility and their relationship with the adult with whom they are staying at the facility.

To this end, the Reception Employee takes all possible steps to carry out the identification of a child and their relationship with the adult who accompanies the child.

For the purposes of identifying a child and their relationship with the adult with whom they are in the facility:

1. At the booking stage, a guest should be informed of the need to present a child's identity document when checking-in at the hotel, and the consent of the parents/legal guardians if the child is travelling with a stranger adult.
2. Ask for the child's identity document (ID card) or other document confirming the child's details. The examples of other documents that can be used for identification include: passport, pre-school or school ID card, MOcitizen app.
3. If an identity document is missing or refused, both the adult and the child should be asked to provide the child's details (e.g. name, surname, address, date of birth). In addition, both the adult and the child should be asked about the relationship between them. An example of an adult-child interview scheme is included in *Appendix No. 1*.
4. If the adult is not the child's guardian, he or she should be asked to show a relevant document, e.g. a parent's permission for the person to travel with the child. This may be a written consent with an official signature certified by a notary public or a consent signed by the child's parent containing the child's details, the child's address, the parent's telephone number and the identity document/PESEL number of the person to whom the parent has entrusted the custody of the child. If the adult does not have any of the above-mentioned documents, he/she shall be asked to fill in the relevant statement according to the model prepared by the tourist facility. The statement should include the details of the child and the details of the adult with whom the child is staying, together with an indication of the relationship that exists between the child and the adult. When an adult is not the child's parent or guardian, he/she should declare that the parents/guardians have agreed to take care of the child.
5. In the event that an adult accompanying a child refuses to show the child's document and/or indicate the relationship between them, it should be explained that the procedure is in place to ensure the safety of children using the Airport Hotel Okęcie and that, in accordance with the provisions of the Act of 13 May 2016, the employees of the facility are required to determine whether a child

is safe. Once the matter has been positively clarified, it is necessary to thank for taking the time to make sure the child is well looked after.

6. If the conversation does not dispel doubts about the adult accompanying the child and his/her intentions towards the child, and in particular if he/she refuses to show an identity document or make a statement containing the child's details, it is necessary to discreetly notify the supervisor and security staff (if they are in the premises at the time) in such a way as not to arouse suspicion (e.g. it is possible, for instance, to inform the adult that you have to use the equipment at the back of the reception area, asking him/her to wait with the child in a lobby, restaurant or other place).
7. From the moment the first concerns arise, the employee of the tourist facility should be attentive to both the child and the adult, and if possible try to ensure that they are not left alone.
8. The supervisor who has been informed about the situation shall take over the conversation with the adult for further clarification.
9. If the conversation confirms the belief that an attempt has been made or act has been committed against the child, the supervisor shall notify the police. Further, the procedure as in the case of circumstances indicating child abuse (see Section III) shall apply.
10. If unusual and/or suspicious situations are witnessed by the employees of other departments of Airport Hotel Okęcie, e.g. cleaning service, room service, bar and restaurant staff, relaxation area staff, security, etc., they should immediately notify their supervisor or, in his/her absence, the decision maker who will take appropriate action (see par. 7 and 8 above).
11. Depending on the situation and location, the supervisor verifies if the suspicion of child abuse is reasonable. To this end, appropriate measures should be taken to clarify the situation or inform the Coordinator. If the Coordinator is not available at the time, he or she decides to intervene and notifies the police.

### **Section III.**

#### **Procedure for intervention when circumstances indicating child abuse by an adult are disclosed**

1. Disclosure of abuse can occur in the following ways:
  - a) a child has disclosed the fact of abuse to the employee of the facility,
  - b) an employee observed child abuse,
  - c) a child shows signs of abuse (e.g. scratches, bruises) and when asked answers incoherently and/or chaotically and/or falls into embarrassment or there are other circumstances that may indicate abuse, e.g. finding child pornography in an adult's room.
2. An employee who has a reasonable suspicion that a child in the facility is being or has been harmed should immediately inform the Supervisor/Coordinator/Director who will notify the police.
3. In the event of an existing threat to a child's safety, an employee who has a reasonable suspicion that a child is being harmed shall immediately notify the police by calling 112 and describing the circumstances of the incident. Notwithstanding the above, the Employee shall notify the Airport Hotel Okęcie Coordinator of the incident.
4. Efforts should be made to make it difficult or even impossible for the child and the person suspected of child abuse to move away from the premises.
5. In the case referred to in Article 243 of the Code of Criminal Procedure, the apprehension of the suspect may be carried out by citizens. In such a situation, until the police arrive, the detainee shall remain under the supervision of security personnel or other employees of the hotel who can carry out such actions without endangering their health or life.
6. In any case, the safety of the child must be ensured. The child, if possible, should be under the care of an employee until the police arrive. Where possible, an attempt should be made to support the child.
7. In the event of a reasonable suspicion that an offence has been committed resulting in contact between a child and the biological material

of the perpetrator (sperm, saliva, epidermis), the child should, if possible, be prevented from washing and eating/drinking until the police arrive. It is important to calmly and respectfully explain to the child why such restrictions have been applied to them.

8. 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 handed over to the Coordinator, who will forward a copy to the public prosecutor or the police in person or by registered mail upon request.
9. After the intervention, the incident should be reported to the Coordinator, who then describes it in the incident log or other document intended for this purpose.

#### **Section IV.**

##### **Procedure in the event of the suspicion or acknowledgement of child abuse by an employee/other adult**

1. In the event of suspected child abuse by an employee or other adult who is not directly employed by the Airport Hotel Okęcie but by a third party, the person who obtained this information should inform the Coordinator or the Hotel Director immediately.
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 his/her 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.
3. When an employee has perpetrated a form of harm to a child other than committing a criminal 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 harming the child and other witnesses to the incident. When the violation of a child's well-being is significant, in particular, when there has been discrimination or a breach of dignity of the

child, the Coordinator should instruct the person in charge of the facility about the appropriate personnel action to implement in relation to such an employee.

4. If the person who harmed the child is not directly employed by Airport Hotel Okęcie but by a third party (e.g. outsourcing), then a recommendation should be made to ban him/her from the Airport Hotel Okęcie premises and, if necessary, terminate the contract with the third party.

## **Section V**

### **Procedure when other forms of violence against a child by a parent/guardian/other adult are identified**

1. If a child is found to be abused by a parent/carer or other adult with whom the child is in 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 notify the police by calling the emergency number 112, giving his/her 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 also informs the Coordinator, at least by email/in writing.
3. If an employee at a facility witnesses physical violence being used against a child (spanking, tugging, shouting, others listed in the definition of physical violence) they should try to stop the abuse and respond. See *Appendix 4* for possible forms and ways of responding to abusive behaviour by a parent/carer/other adult towards a child.
4. In the event of a child under the age of 7 being left unattended, the employee who becomes aware of such an incident should notify a supervisor. The superior who has been informed about the situation shall decide on the further course of action, in the context of the provisions of the Criminal Code and the



Code of Offences<sup>5</sup>. Depending on this context, the supervisor shall attempt to locate the parent/legal guardian or other adult with whom the child is in the premises and explain that they cannot leave the child unattended. If it is not possible to locate the parent/legal guardian or other adult with whom the child is in the premises, or the parent/legal guardian/other adult is unwilling and/or unable to take care of the child, the supervisor shall notify the police. In any case, the safety of the child must be ensured. While waiting for the police, the child is accompanied by two hotel employees.

## **Section V**

### **Monitoring and evaluation of the Child Protection Standards**

1. The Hotel Director appoints a Coordinator responsible for the Child Protection Standards applied at Airport Hotel Okęcie and places his/her contact details in a place easily accessible to the staff, and informs hotel guests that contact with the person responsible for the implementation of the SOM is possible through the hotel reception.
2. The Hotel Director defines the scope of the tasks and competences of the Coordinator in terms of preparing employees to apply the provisions of the Child Protection Standards, the principles of preparing employees to apply them and the way of documenting these activities
3. The Coordinator referred to in the preceding paragraph shall monitor and evaluate the Child Protection Standards at least once every two years.
4. Monitoring and evaluation includes verifying the implementation of the Child Protection Standards, responding to the signals of the breaches of policies and procedures and proposing changes to the document, particularly to adapt them to current needs and to ensure compliance with binding legislation.

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<sup>5</sup> Criminal Code Article 160 item 1 and 2; Article 210 item 1, Code of Offences Article 106

5. The Coordinator conducts a questionnaire among Airport Hotel Okęcie employees at least once every 2 years to monitor the level of the implementation of the Child Protection Standards.
6. In the questionnaire, employees can suggest changes and indicate violations in the scope of the policies and procedures of the Airport Hotel Okęcie Child Protection Standards
7. The Coordinator processes the questionnaires filled in by the employees, draws up a monitoring report on this basis and forwards it to the Hotel Director. The Hotel Director introduces the necessary changes to the document and announces the new wording of the Child Protection Standards to the employees.

#### **Section VI Final provisions**

1. The Child Protection Standards become effective as of 14.08.2024.
2. The Child Protection Standards are made available to all the employees by posting them on the Airport Hotel Okęcie website and at the hotel reception.
3. The Child Protection Standards *are made available to adult guests of Airport Hotel Okęcie by posting on the Airport Hotel Okęcie website and at the hotel reception.*
4. The Child Protection Standards are made available in an intelligible and abbreviated version for children staying at the Airport Hotel Okęcie in a place accessible and visible to them. The abridged version includes graphic elements.

Warsaw, 14.08.2014

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First and Last Name of the  
Hotel Director