
Annex No. 1 to Order No. 3 of 01.07.2024

Standards for the Protection of Minors Child Protection Policy Against Harm

Entity Name: Bachleda Hotel Sp. z o.o.

Tax Identification Number (NIP): 7361716545

Business Registry Number (REGON): 122684679

Registered Address: ul. Szymaszkowa 20, 34-500 Zakopane

§ 1

Preamble

1. The purpose of this Policy is to define and implement the Standards for the Protection of Minors within the Entity as a special measure for safeguarding minors. The Policy has been drafted with consideration for the need to ensure that its provisions are understandable to minors, including children with disabilities. The aim of implementing this Policy is to uphold the principle of equal treatment of minors and to act in their best interests, including listening to and considering their opinions in accordance with their age and maturity.
2. The objectives and obligations set forth in the Policy are carried out in accordance with applicable laws, the Entity's internal regulations, and principles of social coexistence.

§ 2

Legal Basis

The Act of May 13, 2016, on Preventing Threats of Sexual Crimes and the Protection of Minors (Journal of Laws 2024, item 560, consolidated text as of April 12, 2024, as amended).

§ 3

Designated Persons Responsible for Implementing Specific Tasks

1. The person responsible for receiving reports of incidents posing a threat to minors, providing them with support, maintaining a register of reports, reviewing and updating the Policy as necessary to align it with legislative amendments or changing circumstances, monitoring compliance with the Policy, responding to reports of violations, and maintaining the register of reports: Katarzyna Stopka – Gadeja, Head of the Administration Department [hereinafter: the person responsible for receiving reports of incidents posing a threat to minors and providing them with support].
2. The person responsible for implementing the Policy: Katarzyna Stopka – Gadeja.
3. The person responsible for collecting statements from Personnel confirming their acknowledgment, understanding, and acceptance of the Policy: Katarzyna Stopka – Gadeja, Head of the Administration Department.

§ 4

Glossary of Terms

1. **Minor / Child** – any person under the age of 18.
2. **Entity** – Bachleda Hotel Kasprowy.
3. **Manager** – a person, body, or entity within the structure of the Entity that, in accordance with applicable law and/or internal documents, is authorized to make decisions regarding the Entity's operations.
4. **Person responsible for receiving reports of incidents posing a threat to minors and providing them with support** – a designated individual responsible for receiving reports of incidents posing a threat to minors, providing them with support, maintaining a register of reports, reviewing and updating the Policy as necessary to align it with legislative amendments or changing circumstances, monitoring compliance with the Policy, responding to reports of violations, and maintaining the register of reports.
5. **Policy** – this document, the *Standards for the Protection of Minors*.

6. **Child abuse** – an act or omission that may constitute a criminal offense against a minor, a punishable act against a minor, or any other action/omission that harms a minor, including neglecting the child’s essential needs.
7. **Domestic violence** – a single or repeated intentional act or omission that exploits physical, psychological, or economic dominance, violating the rights or personal well-being of the person experiencing domestic violence, in particular:
 - a) exposing the person to the risk of loss of life, health, or property,
 - b) violating their dignity, physical integrity, or freedom, including sexual freedom,
 - c) causing harm to their physical or mental health, resulting in suffering or distress,
 - d) restricting or depriving the person of access to financial resources or the ability to work or achieve financial independence,
 - e) significantly violating their privacy or causing a sense of threat, humiliation, or distress, including through electronic communication.
8. **Person experiencing domestic violence** – a minor who is subjected to domestic violence or a minor who witnesses domestic violence.
9. **Perpetrator of domestic violence** – an adult who commits domestic violence against a person experiencing domestic violence.
10. **Personnel** – any person employed within the Entity, regardless of the form of employment, including associates, interns, volunteers, or other individuals.
11. **Child’s guardian** – parents, legal guardians, and other persons entrusted by a court with the care of a child.
12. **Punishable act** – an act prohibited by law as a criminal offense, fiscal offense, misdemeanor, or fiscal misdemeanor.
13. **Prohibited act** – conduct that meets the criteria specified in criminal law.

§ 5

Obligations of Personnel in Connection with the Implementation of the Policy

Each member of the Personnel is required to familiarize themselves with the content of the Policy and confirm this by submitting an appropriate declaration of acknowledgment, understanding, acceptance, and commitment to strict compliance – in accordance with the template provided in **Annex No. 1 to the Policy**.

§ 6

Personnel Education

The Entity provides Personnel with basic education on the protection of minors from harm and assistance to minors in situations of risk. This includes recognizing signs of child abuse, applying appropriate legal intervention procedures in cases of suspected abuse, understanding the legal responsibilities of the Entity’s Personnel, the procedure for implementing the “Blue Card” system, and ensuring compliance with children's rights as well as respectful communication with minors and their guardians.

§ 7

Reports and Interventions Registers

1. A register is maintained for cases of reports related to suspected child abuse and initiated interventions, in the form of Intervention Cards – according to the template provided in **Annex No. 2 to the Policy**.
2. The register is kept either in paper or electronic form.

3. The register is maintained by the person responsible for receiving reports of incidents posing a threat to minors and providing them with support.

§ 8

Supplementary Information

1. Information containing contact details for local support and emergency services, including information on how to obtain assistance in difficult situations for minors, along with the numbers of free helplines, is posted in a publicly accessible area within the Entity – according to the template provided in **Annex No. 3 to the Policy**.

§ 9

Principles Ensuring Safe Relationships Between Minors and Personnel of the Entity, and in Particular, Prohibited Behaviors Towards Minors

[General Principles]

1. Personnel are required to comply with the applicable laws, with particular emphasis on the absolute adherence to the rights of minors.
2. Personnel must act in the best interest of the minor in all activities undertaken with respect to the minor.
3. In every interaction with a minor, Personnel must take into account the minor's age, cognitive abilities, and individual needs.
4. When interacting with minors and their guardians, Personnel must exhibit: kindness, empathy, respect, cultural sensitivity, and a non-judgmental attitude.

[Right to Information and Cooperation]

1. Personnel should introduce themselves during contact with the minor, explain their role within the Entity, inform the minor of the purpose of their visit, and provide information about what is happening and the circumstances. Personnel should create an opportunity for the minor to ask questions. When communicating with the minor and their guardians, Personnel should address the minor by name in the form preferred by the minor, while keeping in mind the presence of the minor in discussions with the guardians or other Personnel members. Personnel should respect the minor's right to emotional variability and changes in opinion, particularly as a result of the new situation the minor finds themselves in during their visit to the Entity.
2. Information should be conveyed in a simple and accessible manner, ensuring that it is understandable to the minor. The form of communication and the content shared should consider the minor's age, situation, developmental level, and emotional maturity.

[Respect for the Minor's Privacy]

1. Every minor has the right to the respect of their privacy and dignity.
2. A guardian or another member of Personnel should accompany the minor during any examination.
3. Taking into account the situation of the minor, their needs, and their legitimate interests, physical contact with the minor is permissible while respecting the principles of social coexistence within commonly accepted norms and boundaries. However, prior approval from the minor should always be obtained, e.g., for a hug to calm the minor.

4. It is forbidden to establish any relationships with minors that could be classified as sexual or romantic, or to conceal information about the potential occurrence of such relationships. This includes phenomena such as infatuation by a minor with a member of Personnel, or vice versa. Any such information should be reported to the Unit's manager in a manner that guarantees respect for the dignity of the individuals concerned or potentially concerned.
5. All hygienic and care-related activities must be performed in a manner and under conditions that ensure the respect for the privacy and dignity of the minor.

[Relationship with the Minor's Guardians]

1. If necessary, Personnel should explain the principles of the Unit's operation.
2. It is forbidden to establish any relationships of dependency towards the minor or the minor's guardians, as well as to behave in a way that could suggest the existence of such a dependent relationship.

[Prohibited Conduct Toward Minors by the Unit's Personnel]

1. In contact with a minor, it is prohibited to shame, humiliate, disregard, insult, blackmail, or show favoritism.
2. It is forbidden to ignore or downplay the minor's experiences, such as feelings of fear, anxiety about pain, or concerns about the future.
3. It is forbidden to treat the minor in a dehumanizing manner or in violation of the principle of equality.
4. Personnel are not allowed to yell at the minor, unless dictated by safety concerns.
5. Any form of violence toward the minor is prohibited.
6. Personnel not covered by professional secrecy obligations must comply with the data protection regulations in force at the Unit, particularly it is unlawful to disclose any information about the minor, including details regarding their health, image, family, economic, custodial, or legal situation, or their ideological or religious views.
7. It is forbidden to behave in an inappropriate or ambiguous manner in the presence of minors, or in a way that could objectively be considered as such. This includes using vulgar language, gestures, jokes, making offensive comments, referring to sexual activity or attractiveness, or exploiting relationships of power or physical superiority toward minors.
8. It is forbidden to accept any items, including money, from minors, guardians, or third parties¹.
9. It is prohibited for the Staff to record, photograph, or broadcast, in any form, the image or voice of a minor for private purposes, including video recording, audio recording, audiovisual recording, photography, or live streaming involving the minor.

¹ Art. 228. of 6 June 1997 Penal Code / Venality of a person performing a public function

§ 1. Whoever, in connection with the performance of public duties, accepts a financial or personal benefit or its promise, shall be subject to imprisonment for a term of between 6 months and 8 years.

§ 2. In cases of lesser gravity, the perpetrator shall be subject to a fine, restriction of liberty, or imprisonment for up to 2 years.

§ 3. Whoever, in connection with the performance of public duties, accepts a financial or personal benefit or its promise for actions that constitute a violation of the law, shall be subject to imprisonment for a term of between 1 and 10 years.

§ 4. The penalty specified in § 3 shall also apply to anyone who, in connection with performing a public function, makes the performance of an official act dependent on receiving a material or personal benefit or a promise thereof or demands such a benefit.

§ 5. Whoever, in connection with the performance of public duties, accepts a financial benefit of significant value or its promise, shall be subject to imprisonment for a term of between 2 and 15 years.

§ 5a. Whoever, in connection with the performance of a public function, accepts a material benefit of great value or a promise thereof, shall be subject to the penalty of imprisonment for a term of 3 to 20 years.

§ 6. The penalties specified in paragraphs 1–5a shall also apply to anyone who, in connection with the performance of public duties in a foreign country or international organization, accepts a financial or personal benefit or its promise, demands such a benefit, or conditions the performance of an official act upon receiving it.

10. It is forbidden to offer minors alcohol, tobacco products, illegal substances, or to use them in their presence, or to supply them from third parties.

§ 10

Principles and Procedures for Intervening in Cases of Suspected Harm or Knowledge of Harm to a Minor. Procedures and Individuals Responsible for Reporting Suspected Crimes Against Minors, Notifying the Guardianship Court, and, in Institutions with Such Authority, Initiating the "Blue Card" Procedure. Guidelines for Establishing a Support Plan for the Minor After Disclosure of Harm.

[Legal Bases for Taking Intervention Actions]

1. Provisions of the Act of June 6, 1997, Penal Code².
2. Provisions of the Act of July 29, 2005, on Counteracting Domestic Violence³.
3. Provisions of the Act of November 17, 1974, Civil Code⁴.
4. Provisions of the Act of June 6, 1997, Code of Criminal Procedure⁵.
5. Provisions of the Act of June 9, 2022, on Supporting and Resocializing Juveniles⁶.

[Child Abuse and Its Forms]

1. **Child abuse** - may take the form of:
 - a. committing a crime to the detriment of the minor, or
 - b. committing an offense to the detriment of the minor, or
 - c. other actions/omissions detrimental to the minor, including neglecting their basic needs.

[Obtaining and Internally Communicating Information About the Need for Intervention]

² **Article 240 of the Act of June 6, 1997, Penal Code / Punishable Failure to Report a Crime**

§ 1. Anyone who, having reliable information about the preparation, attempt, or commission of an offense specified in Articles 118, 118a, 120-124, 127, 128, 130, 134, 140, 148, 148a, 156, 163, 166, 189, 197 § 3-5, 198, 200, 252, or a terrorist offense, fails to immediately notify the competent authority responsible for prosecuting crimes, shall be subject to imprisonment for up to 3 years.

§ 2. No offense is committed by a person who failed to report, provided they had sufficient grounds to assume that the authority mentioned in §1 was aware of the prepared, attempted, or committed offense; nor is an offense committed by one who prevented the commission of the prepared or attempted offense.

§ 2a. No punishment is imposed on the victim of the offense referred to in §1 who failed to report it.

§ 3. No offense is committed by a person who failed to report due to fear of criminal liability threatening themselves or their close relatives.

³ **Article 12 of the Act of July 29, 2005, on Counteracting Domestic Violence / Obligation to Report Crimes Involving Violence**

1. Persons who, in connection with the performance of their official or professional duties, have become suspicious of a crime involving domestic violence prosecuted ex officio shall immediately notify the Police or prosecutor.

2. Persons witnessing domestic violence should report it to the Police, prosecutor, or another entity acting to counteract domestic violence.

⁴ **Article 572 of the Act of November 17, 1974, the Civil Code / Obligation to Notify**

§ 1. Anyone who is aware of an event justifying the initiation of proceedings ex officio is obliged to notify the guardianship court about it.

§ 2. The obligation mentioned in § 1 primarily applies to civil registry offices, courts, prosecutors, notaries, bailiffs, local government and government administration bodies, police authorities, educational institutions, social guardians, and organizations and institutions involved in the care of children or mentally ill individuals.

⁵ **Article 304 of the Act of June 6, 1997, Code of Criminal Procedure / Obligation to report a crime.**

§ 1. Anyone who learns about the commission of an offense prosecuted ex officio has a civic duty to notify the prosecutor or the Police. The provisions of Article 148a and Article 156a shall apply accordingly.

§ 2. State and local government institutions that, in connection with their activities, have learned about the commission of an offense prosecuted ex officio, are obliged to immediately notify the prosecutor or the Police and take necessary actions until the arrival of the agency authorized to prosecute such offenses or until that agency issues a suitable ruling, in order to prevent the erasure of traces and evidence of the offense.

§ 3. The Police shall forward the notification of a crime or their own data indicating the commission of such a crime, for which an investigation by the prosecutor is mandatory, along with the collected material, to the prosecutor without delay.

⁶ **Article 4, Section 2 of the Act of June 9, 2022, on Supporting and Resocializing Minors / Obligation to report in the case of a minor perpetrator**

1. Anyone who finds that there are circumstances indicating the demoralization of a minor, in particular committing a prohibited act, violating the rules of social coexistence, avoiding compulsory schooling or education, using alcohol, narcotics, psychotropic substances, their precursors, substitutes or new psychoactive substances, hereinafter referred to as "psychoactive substances", engaging in prostitution, has a social obligation to counteract this appropriately, and above all to notify the parents or guardian of the minor, the school, the family court, the Police or another competent authority.

2. Anyone who learns about a minor committing a criminal offense has a social duty to notify the family court or the Police about it.

1. In the event of a justified suspicion or occurrence of an event involving harm to a minor, the Personnel are obligated to take appropriate action, depending on the type of circumstances.
2. Each member of the Personnel, in the situation described in Section 1, is required to immediately pass on the information to the designated person responsible for receiving reports of events threatening minors and providing them with support within the Unit. If this is not possible, the information is passed on to the Unit Manager.
3. The person designated in the Unit for receiving reports of events threatening minors and providing them with support is responsible for initiating and conducting the intervention. In situations where such a person has not been designated or is unable to fulfill their duties, the Unit Manager is responsible. In exceptional situations, the on-duty physician informed about the event is authorized and obligated to take intervention action. In the absence of such a physician, the member of the Personnel who received the information justifying the intervention is responsible.
4. In situations requiring a detailed analysis of the event, the person designated in the Unit for receiving reports of events threatening minors and providing them with support, or the person performing their tasks, conducts consultations aimed at clarifying the circumstances of the event. This involves consulting with other members of the Personnel, the minor, their guardian, individuals suspected of harming the child, or witnesses. In cases where it is impossible to make definitive findings, intervention action is taken, which in this case involves initiating the "Blue Card" procedure by completing the "Blue Card – A" form, in accordance with the provisions of the Council of Ministers' Regulation of September 6, 2023, regarding the "Blue Card" procedure and the templates for "Blue Card" forms.
5. If the person designated in the Unit for receiving reports of events threatening minors and providing them with support, or the person actually performing their tasks, is suspected of harming minors, their tasks as defined in this Policy are taken over by: Sebastian Nocuń – General Director of the Hotel.
6. In the event of an extremely dangerous situation for the life or health of a minor, the police or prosecutor's office must be informed immediately by telephone.
7. The information flow regarding reports of harm to minors is illustrated by the diagram in **Annex No. 4 to the Policy**.

[Intervention Action – In the Case of a Crime]

1. In the event of a justified suspicion of a **crime committed against a minor**, the intervention action involves preparing a written notification of the suspicion of a crime and submitting it to the police or the prosecutor's office.
2. The notification of the suspicion of a crime should include:
 - a. a description of the event,
 - b. the data of the injured minor (name, surname, address, PESEL number, etc.),
 - c. to the extent possible, the data of the suspected person (name, surname, address, PESEL number, etc.).

[Intervention Action – In the Case of a Criminal Offense Committed by a Minor]

1. In the event of a justified suspicion that **a minor has committed a criminal offense against another minor**, the intervention action involves preparing a written notification of the suspicion of committing a criminal offense and submitting it to the police, the prosecutor's office, or the family court.
2. The notification of the suspicion of committing a crime should include:

- a. a description of the event,
- b. the data of the injured minor (name, surname, address, PESEL, etc.),
- c. to the extent possible, the data of the suspected person (name, surname, address, PESEL, etc.).

[Intervention Action - In the Case of a Prohibited Act Committed by a Minor]

In the event of a justified suspicion that a minor has committed a prohibited act against another minor, or violated social coexistence rules to the detriment of a minor, the intervention action involves fulfilling the social duty to take corrective measures to counteract this, and primarily notifying the minor's guardians, the school, the family court, the Police, or another competent authority.

[Intervention Action - In Cases of Harm Other Than a Crime]

1. **[Perpetrator from the Personnel]** If the harm to a minor is committed by a member of the Unit's Personnel, and their actions or omissions do not lead to a justified suspicion of a crime, the intervention action depends on the nature of the event and involves passing on relevant information to the Employer. Following their decision, the actions may include:
 - a. conducting a disciplinary conversation with the Personnel member by the Employer or a person designated by the Employer,
 - b. initiating disciplinary proceedings against the Personnel member by the Employer or a person designated by the Employer,
 - c. the Employer or a person designated by the Employer assessing the justification for continuing the legal relationship between the Personnel member and the Unit. If the Personnel member is connected to a third-party entity that performs tasks for the Unit, this involves assessing the justification for terminating cooperation with that entity regarding the services provided by the perpetrator.
8. **[Perpetrator Using Domestic Violence]** If the harm to a minor is committed by a person using domestic violence, but their actions or omissions do not lead to a justified suspicion of a crime, and there is a justified suspicion of domestic violence or a witness has reported it within the Unit, the intervention action involves initiating the "Blue Card" procedure by completing the "Blue Card – A" form, in accordance with the provisions of the Act of July 29, 2005, on Counteracting Domestic Violence and the Council of Ministers' Regulation of September 6, 2023, regarding the "Blue Card" procedure and the templates for "Blue Card" forms.
9. **[Perpetrator is a Third Party / Not Related to Domestic Violence]** If the harm to a minor is committed by a third party whose actions or omissions do not lead to a justified suspicion of a crime, nor is there a justified suspicion of domestic violence, or circumstances prevent the evaluation of the event, the intervention action involves preparing and submitting to the family court a letter requesting insight into the family situation, in accordance with the provisions of the Act of November 17, 1964, Code of Civil Procedure.
10. **[Perpetrator is Another Minor]** If the harm to a minor is committed by another minor whose actions or omissions do not lead to a justified suspicion of a criminal offense, or circumstances prevent a clear qualification of the negative event, the intervention action involves preparing and submitting to the family court a letter requesting insight into the family situation, in accordance with the provisions of the Act of November 17, 1964, Code of Civil Procedure.

The procedure for intervention actions is outlined in **Annex No. 5 to the Policy**.

§ 11

Principles for Reviewing and Updating Standards.

1. The person responsible for receiving reports of events threatening minors and providing them with support conducts an anonymous survey among the Unit's Personnel at least once every 24 months to monitor the implementation level of the Policy. The survey template is included as **Annex No. 6 to the Policy**.
2. During the completion of the survey monitoring the implementation level of the Policy, the Unit's Personnel have the opportunity to propose specific changes to the Policy's content and indicate cases of Policy violations within the Unit.
3. The completed surveys monitoring the implementation level of the Policy are analyzed, and based on this analysis, the person responsible for receiving reports of events threatening minors and providing them with support prepares a report on the monitoring, which is submitted to the Unit Manager.
4. The Unit Manager, based on the prepared report, decides on the justification for introducing changes to the Policy.
5. The revised content of the Policy is communicated in the manner specified within it.

§ 12

Scope of Competencies of the Person Responsible for Preparing the Unit's Personnel to Apply the Procedure, Principles for Preparing This Personnel, and Method of Documenting This Action.

1. The person responsible for receiving reports of events threatening minors and providing them with support should, in the assessment of the Unit Manager:
 - a. demonstrate empathy and understanding of minors' problems,
 - b. possess the ability to conduct effective communication with minors in a manner appropriate to their age and development, as well as with their guardians,
 - c. be characterized by calmness and composure in interactions with minors, their guardians, and the Unit's Personnel, including the ability to quickly and effectively respond in crisis situations,
 - d. have a positive work evaluation,
 - e. possess education or appropriate preparation and experience necessary for performing the entrusted function, ensuring the proper execution of assigned tasks.
2. The person responsible for receiving reports of events threatening minors and providing them with support should also possess organizational skills and the ability to consult on issues related to the application of the Policy's provisions with members of the Personnel.

§ 13

Principles and Method of Providing Standards to Parents or Legal or Actual Guardians and Minors for Familiarization and Implementation.

1. The Policy, both in its full and abbreviated versions, is an open document for everyone, including Personnel, minors, and their guardians.
2. The abbreviated version of the Policy is prepared and intended primarily for minors and contains essential information for them in a simplified form.
3. The Policy in both its full and abbreviated versions is made available on the Unit's website at www.kasprowy.pl and posted in a visible location on the bulletin board.

§ 14

Persons Responsible for Receiving Reports of Events Threatening Minors and Providing Them with Support. Method of Documenting and Principles for Storing Disclosed or Reported Incidents or Events Threatening the Well-being of Minors.

1. The person reporting circumstances justifying intervention actions may be, in particular:
 - a. a member of the Unit's Personnel,
 - b. a guardian of the minor,
 - c. the minor themselves,
 - d. a third party, including a witness to the event.
2. In the case of a report made by a member of the Unit's Personnel, the report is handled in accordance with the procedure, i.e., information is immediately passed on to the designated person responsible for receiving reports of events threatening minors and providing them with support within the Unit. If this is not possible, the information is passed on to the Unit Manager.
3. In the case of a report made by individuals other than members of the Unit's Personnel, the person reporting the event may do so:
 - a. in person to a member of the Unit's Personnel,
 - b. in person to the designated person within the Unit responsible for receiving reports of events threatening minors and providing them with support,
 - c. by phone to the designated person within the Unit at the numbers (+48) 602302131 or (+48) 182024061,
 - d. via email to the designated person within the Unit by sending correspondence to the address: kstopka@kasprowy.pl,
 - e. through anonymous information left in a drop box, which should be placed in a secure location ensuring confidentiality and not covered by video surveillance cameras. The contents of the drop box should be checked daily by the designated person within the Unit.
4. The person handling the information channels mentioned in points c/d/e is obligated to immediately pass on information about the occurrence of circumstances justifying intervention actions to the designated person responsible for receiving reports of events threatening minors and providing them with support within the Unit. If this is not possible, the information is passed on to the Unit Manager.

§ 15

Requirements for Safe Relationships Between Minors, Particularly Prohibited Behaviors.

1. The Unit's Personnel is obligated to pay special attention to inappropriate behavior among minors and to respond appropriately and adequately.

2. Minors staying in the Unit should behave in a polite manner in accordance with the disciplinary rules defined in the Unit, including the principles of social coexistence, and their guardians should properly ensure that these rules are followed by the minors.
3. Prohibited actions by minors staying in the Unit include, in particular:
 - a. playing, distributing, or encouraging others to play dangerous games,
 - b. encouraging others to violence or self-harm,
 - c. distributing dangerous or prohibited content, including:
 - i) content depicting violence, physical harm, or death, such as road accidents or cruelty to animals,
 - ii) content promoting self-harm or suicide, or behaviors harmful to health, or the use of dangerous substances,
 - iii) discriminatory content containing hostile or hateful attitudes,
 - iv) pornographic content.
 - d. engaging in cyberbullying,
 - e. using hate speech.
 - f. Distributing, without their consent, the images of other guests staying in the Unit.

§ 16

Principles for Using Electronic Devices with Internet Access. Procedures for Protecting Children from Harmful Content and Threats on the Internet and Recorded in Other Forms.

[Good practices for personnel using the Internet / social media]

1. The Unit's Personnel, while performing their assigned tasks, must be aware of the risks inherently associated with using digital technologies in their work and the global Internet. Therefore, each member is obligated to enhance their qualifications and awareness in applying cyber-safe solutions in their work.
2. Personnel should possess the ability to recognize threats related to the overlap of their purely personal activities, which they conduct using the Internet, with their professional activities. This is particularly important when it comes to the overlap between the spheres of activity of a Personnel member as a private individual and the activities of minors, which may be correlated depending on their form.
3. Personnel should pay special attention to the fact that their online activity may be recognizable by minors. Consequently, Personnel members should responsibly demonstrate their engagement in specific topics, activities, problems, or discussions. The awareness that minors may also be observers or participants in such activities, topics, or discussions should lead each Personnel member to conduct an individual assessment of the correctness of their behavior.
4. Personnel should exercise prudence and responsibility in formulating their positions and statements on social media regarding specific content, publications, websites, or users. They should also be aware of the types and functionalities of certain applications, where the mere use of them may be negatively evaluated by third parties.
5. It is not recommended to establish contact with minors by accepting or sending invitations on social media using Personnel's private accounts.

[Harmful Content and Threats to Minors]

1. Harmful content refers to materials that may evoke negative emotions in the recipient or promote dangerous behaviors. These can include:
 - a) pornographic content available without any warning, including child pornography, i.e., materials depicting the sexual exploitation of children;

- b) content depicting violence, physical harm, or bodily deformations, such as photos or videos showing accident victims or cruelty to animals;
 - c) content promoting self-harm or suicide, or behaviors harmful to health, such as the pro-ana movement, encouraging the use of dangerous substances like medications or narcotics;
 - d) discriminatory content inciting hostility or even hatred towards different social groups or individuals.
2. In situations where the Unit decides to provide minors with access to hardware or network resources, including Internet access, this must be preceded by a risk analysis. Such access must be provided in accordance with adopted cybersecurity principles, with which users must have the opportunity to familiarize themselves.
 3. In particular, to protect minors from harmful content, it is recommended that:
 - a) a) the equipment provided by the Unit for minors to access Internet resources should be equipped with antivirus and filtering programs that allow for protection against harmful content.
 - b) In cases where minors use equipment other than that provided by the Unit to access Internet resources, it is advisable to inform the minors' guardians about the possibility and justification of installing software with similar functionality on such equipment. This includes informing them about websites that the child visited or attempted to visit in case of blocked access due to harmful content.
 4. Harmful and prohibited content should be reported through the service www.dyżurnet.pl – this is a contact point where one can anonymously report cases of illegal content on the Internet, such as child pornography, pedophilia, racist, and xenophobic content.

§ 17

Final Provisions

1. The Policy comes into effect on the day of its announcement.
2. The announcement of the Policy is made by making it available in both its full and abbreviated versions on the Unit's website at www.kasprowy.pl and by posting them in a visible location on the bulletin board.

§ 18

Change History

The change history of the Policy should be documented in accordance with the table in **Annex No. 7 to the Policy**.

§ 19

List of Annexes

Annex No. 1 to Standards for the Protection of Minors – Employee's Declaration of Familiarity with the Standards for the Protection of Minors;

Annex No. 2 to Standards for the Protection of Minors – Intervention Card;

Annex No. 3 to Standards for the Protection of Minors – Information on the Possibility of Obtaining Free Assistance for Children;

Annex No. 4 to Standards for the Protection of Minors – Scheme for Reporting Information on an Event Justifying Intervention Action – Reporting Harm to Minors;

Annex No. 5 to Standards for the Protection of Minors – Scheme for Intervention Action Procedures;

Annex No. 6 to Standards for the Protection of Minors – Anonymous Survey Monitoring the Standards for Protecting Minors;

Annex No. 7 to Standards for the Protection of Minors – Register of Changes to the Standards for Protecting Minors.

Annex No. 1
to Standards for the Protection of Minors
at Bachleda Hotel Kasprowy

Employee's Declaration of Familiarity with the Standards for the Protection of Minors

I, the undersigned, declare that I have familiarized myself with the content of the Standards for the Protection of Minors adopted at Bachleda Hotel Kasprowy, which I fully understand, accept, and commit to adhering to, particularly in reporting information about events and actions inconsistent with their content.

.....
(Signature of the person submitting the declaration)

INFORMATION OBLIGATION UNDER GDPR

1. The administrator of your personal data is **Bachleda Hotel Sp. z o.o.**, email address: kstopka@kasprowy.pl, hereinafter referred to as the Administrator.
2. Contact details of the Data Protection Officer: Rafał Andrzejewski, iod.r.andrzejewski@szkoleniaprawnicze.com.pl, phone: (+48) 504 976 690.
3. Your personal data will be processed to ensure compliance with the Standards for the Protection of Minors in connection with the legal obligation imposed on the data administrator, for the duration of employment and the period of document archiving, based on Article 6(1)(c) of the GDPR and the Act of May 13, 2016, on counteracting threats of sexual crime.
4. Your personal data may also be processed by entities with which the Administrator has concluded agreements for the processing of personal data or to whom personal data is made available, particularly in the field of IT, legal, or data protection services, as well as internal and external auditors and controllers, law enforcement authorities, and supervisory bodies.
5. The Administrator does not intend to transfer your data to third countries or international organizations.
6. Your personal data has been provided to the Administrator directly by you. In some cases, the Administrator may also receive your personal data from administrative authorities, law enforcement agencies, the judiciary, or other entities.
7. Providing personal data necessary for verification in the Register of Sexual Offenders is required by law and necessary to conclude a contract; failure to provide this data makes it impossible to enter into the contract.
8. Depending on the legal basis for processing, you have the right to:
 - a) access your personal data, including the right to obtain a copy under the conditions specified in Article 15 GDPR;
 - b) request the rectification (correction) of personal data under the conditions specified in Article 16 GDPR;
 - c) request the deletion of data under the conditions specified in Article 17 GDPR;
 - d) request the restriction of processing under the conditions specified in Article 18 GDPR;
 - e) data portability under the conditions specified in Article 20 GDPR;
 - f) object to processing under the conditions specified in Article 21 GDPR;
 - g) lodge a complaint with the supervisory authority (President of the Personal Data Protection Office).
9. Your personal data is not subject to automated decision-making, including profiling.
10. Your personal data will be stored for a period corresponding to the duration of personnel file retention.

**to Standards for the Protection of Minors
at Bachleda Hotel Kasprowy**

Intervention Report

Minor's Name and Surname:		
Reason for Intervention (form of harm):		
Person Reporting Suspected Harm (name and surname, position, or relationship):		
Description of Actions Taken:	Date and Place	Description
Form of Intervention Taken (mark the appropriate option or specify actions taken):	<ul style="list-style-type: none"> • notification of suspected criminal offense, • request for review of the minor's/family's situation, • other type of intervention: 	
Intervention Details (Name of the authority to which the intervention was reported and date of intervention):		
Intervention Results: actions taken by authorities / actions taken by parents: If the institution has relevant information:	Date and authority undertaking the intervention	Description
Remarks and Summary:		

Information on Free Assistance Available for Children

A helpline for children and youth is available 24/7 throughout the week. Remember, you have the right to seek support for yourself. If you need help, call the free number: **(+48) 116 111**.

For more information, visit: www.116111.pl .

The Children's Rights Commissioner runs a free, 24-hour Children's Helpline, where both children and their parents or guardians can receive professional psychological and legal support at any time. If you need help, call the free number: **(+48) 800 12 12 12**.

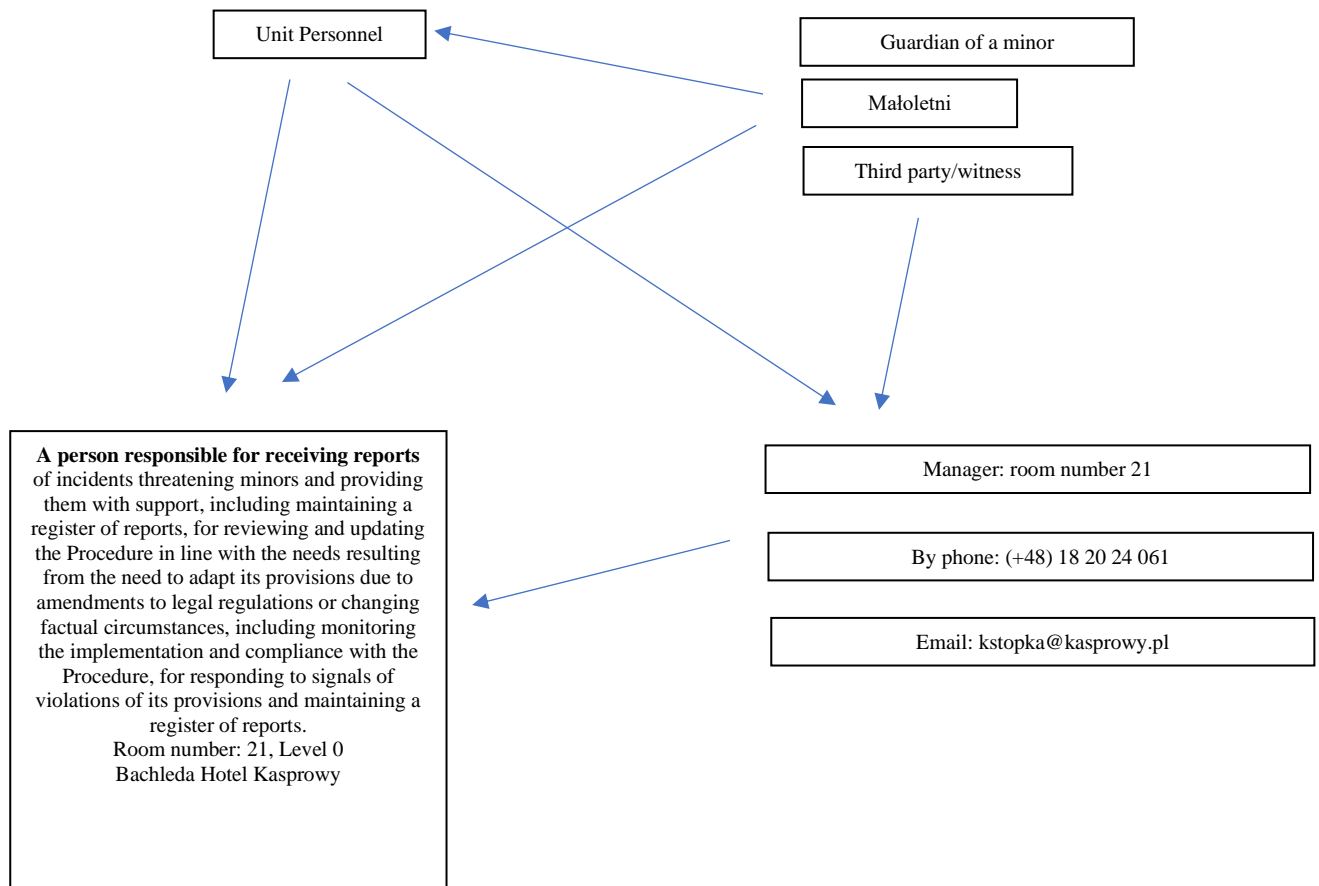
By calling these helplines, every child can talk about anything—friendship, love, growing up, relationships with parents or siblings, school problems, or emotions they are experiencing. They can also receive help if they feel discriminated against, experience violence, or witness it.

Domestic violence is also addressed by:

The Interdisciplinary Team
for Counteracting Domestic Violence in Zakopane,
Address: ul. Jagiellońska 7
Phone: (+48) 18 20 147 33

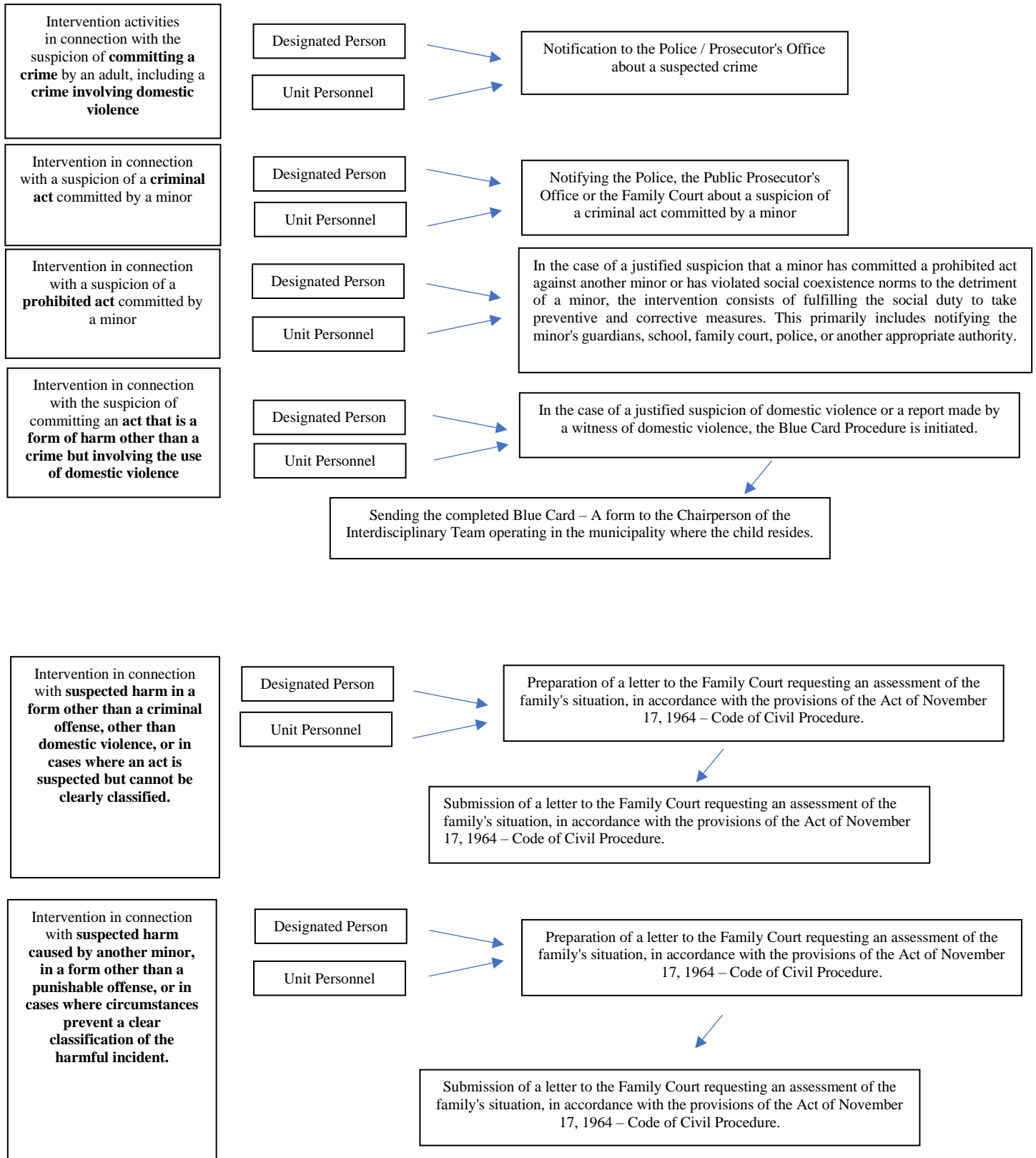
Annex No. 4
to Standards for the Protection of Minors
at Bachleda Hotel Kasprowy

Flow chart of transmitting information about an event justifying intervention – reporting abuse of a minor.

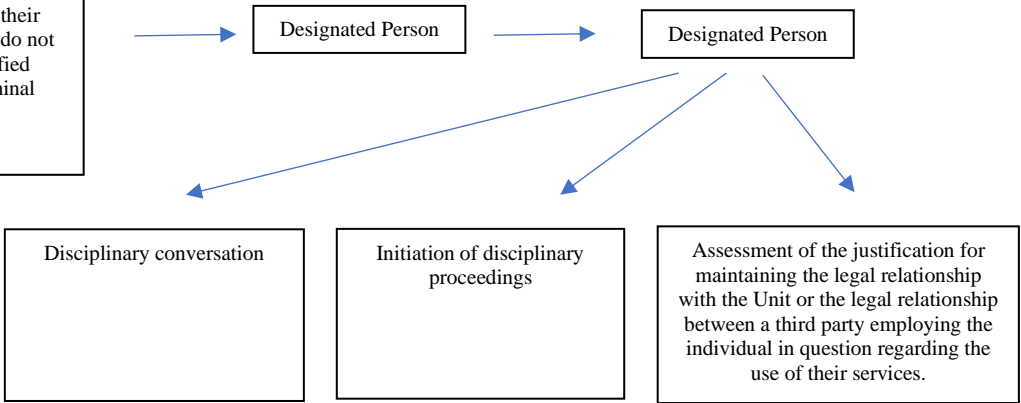


to Standards for the Protection of Minors at Bachleda Hotel Kasprowy

Flow chart of the procedure for taking intervention action



Intervention in connection with suspected harm to a minor by a member of the Unit's Staff, where their actions or omissions do not give rise to a justified suspicion of a criminal offense.



Annex No. 6
to Standards for the Protection of Minors
at Bachleda Hotel Kasprowy

Anonymous survey monitoring
the Standards for the Protection of Minors
at

Question	Yes	No
Do you know the Standards for the Protection of Minors applicable in the Unit where you work?		
Can you recognize the signs of child abuse?		
Do you know how to react to signs of child abuse?		
Do you know the procedure for reporting incidents that endanger minors?		
In the past 24 months, have you observed any violations of the Standards for the Protection of Minors by another member of the Unit's staff? If yes, did you report this to the Unit's manager or your direct supervisor?		
In the past 24 months, have you reported any incidents endangering minors according to the Standards for the Protection of Minors?		
Have you submitted any comments regarding the current provisions of the Standards for the Protection of Minors?		
Do you believe the Standards for the Protection of Minors in the Unit need to be changed/ updated/ supplemented? If yes, describe what these changes should be.		
Other comments regarding the functioning of the Standards for the Protection of Minors in the Unit.		

Annex No. 7
to Standards for the Protection of Minors
at Bachleda Hotel Kasprowy

Standards for the Protection of Minors Change Log

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