

PROCEDURES FOR CHILD PROTECTION AT BACHLEDA RESORT ZAKOPANE (Bachleda Hotel Zakopane Sp. z o.o.)

Bearing in mind the content of the United Nations Guiding Principles on Business and Human Rights, recognising the important role of business in ensuring respect for children's rights, in particular the right to protection of their dignity and freedom from all forms of abuse, Bachleda Resort Zakopane adopts this document as a template for policies and procedures in the event of suspicion and prevention of such harm to a child staying at our property.

The child protection policy will be implemented in our hotels through the following activities:

1. The Hotel conducts its business activities with the utmost respect for human rights, in particular the rights of children as vulnerable persons.
2. The hotel recognises its role in managing a socially responsible business and promoting desirable social attitudes.
3. The hotel pays special attention to the importance of the legal and social obligation to notify law enforcement authorities whenever a crime is suspected to have been committed against children and commits to train its staff in this regard. The hotel undertakes to educate its staff on circumstances indicating that a child on the premises may be abused and on how to respond promptly and appropriately to such situations.
4. One form of effective child abuse prevention is the identification of the child at the facility and his/her relationship with the adult with whom he/she is in the facility. Staff shall take all possible steps to carry out the identification of the child and their relationship with the adult with whom they are at the facility.

Procedure in case of suspected child abuse

- Whenever possible, it is necessary to identify the child and his/her relationship with the adult with whom he/she is staying in the facility.
- In unusual and/or suspicious situations indicating a possible risk of child abuse, identification is obligatory and has to be carried out by the receptionist. Examples of situations that may raise suspicion are included in Appendix 1.
- In order to identify the child and his/her relationship with the person with whom he/she is at the facility, it is necessary to:
 - Ask for the child's identity and the child's relationship to the person with whom he/she has arrived at or is staying at the facility. To do this, it is possible to request the child's identity card or other document that proves that an adult has the right to have custody of the child at the facility. A list of examples of documents is indicated in the footnote below. If there is no identity document, it is possible to request the child's details (name, address, PESEL number).
 - If there are no documents indicating the relationship between the child and the adult, the adult and the child should be asked about their relationship. An example of an adult and child interview scheme is provided in Appendix 2.
 - If the adult is not the child's parent or legal guardian, it is necessary to ask if they have a document showing parental consent for the adult to travel with the child (e.g. a written statement).
 - If the adult does not have a parental consent document, ask for the phone number of the above to call and confirm that the child is on the premises with the adult with the parents'/legal guardians' knowledge and consent.

- If the adult is reluctant to show the child's document and/or indicate the relationship, it should be explained that the procedure serves to ensure the safety of the children using the hotel and has been developed in consultation with NGOs working on the matter.
- Once the issue has been clarified in a positive way, thank the person for taking the time to make sure the child is well cared for and stress again that the procedure is intended to keep children safe.
- If the conversation does not dispel doubts about the suspicion towards the adult and their intentions to abuse the child, it is necessary to discreetly inform the supervisor and security staff (if they are on the premises at the time). In order not to arouse suspicion, you could, for example, mention the need to use the equipment at the back of reception and ask the adult to wait with the child in the lobby, restaurant or other area.
- Once the first concerns or doubts have arisen, both the child and the adult should be under constant observation of the staff and not be left alone.
- The supervisor who has been informed about the situation will decide whether to notify the police or, if in doubt, take over the conversation with the suspect adult for further clarification.
- If the conversation confirms the suspicion that child abuse has been attempted or committed, the supervisor shall notify the police. Further procedure is followed in case of circumstances indicating harm done to the child.
- If unusual and/or suspicious situations are witnessed by employees of other hotel departments e.g. cleaning staff, room service, bar and restaurant staff, relaxation area, security, etc., they should immediately report this to their supervisor who will decide on appropriate action to be taken.
- Depending on the situation and place, the supervisor verifies to what extent the suspicion of child abuse is justified. To this end, he/she selects appropriate measures leading to the clarification of the situation or decides to intervene and notifies the police.

Procedure in case of circumstances indicating child abuse

If there is reasonable suspicion that a child in the facility is being abused, the police should be notified immediately by calling 112 and describing the circumstances of the incident. Depending on the dynamics of the situation and circumstances, the call should be made by the person who directly witnesses the incident (employee/supervisor). If the caller is an employee, he/she should at the same time inform his/her supervisor of the incident.

A reasonable suspicion of child abuse occurs when:

- the child tells a member of staff at the facility about the abuse,
- the staff member has observed the abuse,
- the child shows signs of abuse (e.g. scratches, bruises) and when asked, he/she responds incoherently and/or chaotically and/or becomes confused or there are other circumstances which may indicate abuse e.g. child pornography found in the adult's room.
- In this situation, the child and the person suspected of harming the child should be prevented from leaving the facility.
- In justified cases, a citizen's arrest of a suspected person can be made. In such a situation, the person should be kept under the supervision of two staff members in a separate room away from the view of other visitors until the police arrive.
- In all cases, it is important to ensure the child's safety. The child should be in the care of a member of staff until the police arrive.

- If there is a reasonable suspicion that a crime has been committed involving contact of the child 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.
- Once the police have collected the child, the CCTV footage and other relevant evidence (e.g. documents) relating to the incident should be secured and, if requested by the services, a copy should be forwarded by registered letter or in person to the public prosecutor or the police.
- After the intervention, the event should be described in the event log or in another document intended for this purpose.

Employing people to work with children

- All persons working with children must be safe for them, which means, among other things, that their employment history should indicate that they have not abused any child in the past.
- It is compulsory for every person employed by the hotel for education, leisure and childcare work to be checked into the Sex Offender Registry. Checking a person in the Register is done by printing out the results of a search of the person in the Register with restricted access, which is then inserted in the personal file of the person checked. The verification should be repeated every year. The range of personal data necessary to check a person on the Register is included in Appendix 3.
- All staff working with children, including those who may have potential contact with children, should declare that they have no criminal record and that there are no proceedings for offences against children - Appendix 4.

The Glossary:

For the purposes of this document, the meaning of the following terms has been defined more precisely:

- A child is any person under the age of 18.
- An unknown adult/stranger is any person over the age of 18 who is not the child's parent or legal guardian.
- Harming a child means committing a criminal offence against a child.
- Offence against a child - all offences that can be committed against adults can be committed against children, additionally offences that can only be committed against children (e.g. Sexual Exploitation under Article 200 of the Penal Code). Due to the specific nature of tourist 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 Penal Code), sexual abuse of people who are mentally incapacitated and vulnerable (Article 198 of the Penal Code), sexual abuse of dependence or critical position (Article 199 of the Penal Code), sexual abuse of a person under the age of 15 (Article 200 of the Penal Code), grooming (seduction of a minor by means of remote communication - Article 200a of the Penal Code).
- Every person employed to work with children must be checked in the Sex Offender Registry, including those employed under a civil contract, apprentices, trainees and volunteers, regardless of their nationality or age.