

MINORS PROTECTION STANDARDS

in Film Hotel Sp. z o.o. [Ltd.]

Preamble

Taking into account the legal obligation resulting from the provisions of the Act of 13 May 2016 on counteracting terrorism-based crime and the protection of minors and the content of the United Nations guidelines on business and human rights, recognising the important role of the business in ensuring respect for children's rights, Film Hotel Sp. z o.o. adopts the Minors Protection Standards (also "SOM", "Standards"). This document constitutes a set of rules and procedures applied in the case of a suspicion that a child who is staying in the Doubletree Hotel by Hilton Łódź or Wytwórnia Club is harmed and in order to prevent such threats, taking into account the situation of children with disabilities and children with special educational needs.

Minors Protection Standards in Film Hotel Sp. z o.o. are implemented on the basis of the following principles:

1. Film Hotel Sp. z o.o. operates with respect for the rights of children as especially vulnerable persons.
2. Film Hotel Sp. z o.o. recognises its role in conducting socially responsible business and promoting desired social attitudes.
3. In particular, Film Hotel Sp. z o.o. emphasises the legal and social significance of the obligation to notify law enforcement authorities of any suspicion of committing a crime to the detriment of children and undertakes to train its employees in this respect.

Glossary:

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

1. **Facilities** - Doubletree by Hilton Łódź hotel in which hotel services are provided as specified in the Act of 29 August 1997 on hotel services and services of tour pilots and tourist guide services or/and Wytwórnia Club conducting activities of Cultural Facilities and activities related to the staging of artistic performances.
2. **Child/ minor** - for the purposes of these standards, a child is assumed to be any person under the age of 18. ¹
3. **Guardian** - a statutory representative of the child: parent or guardian; proxy holder; temporary caretaker (i.e. a person authorised to represent a minor citizen of Ukraine who is in the territory of the Republic of Poland without the care of adults)²
4. **Other adult** - any person over 18 who is not a parent or a legal guardian of a child.
5. **Child abuse** - is to be understood as behaviour that may constitute the commission of a criminal act to the detriment of a child by any person, including an employee of an entity, or a threat to the welfare of a child, including neglect of a child; any intentional or unintentional action/inaction of an individual, institution or society as a whole and any result of such action or inaction that

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

² Parents - Article 98 of the Family and Guardianship Code; guardian - Article 155 of the Family and Guardianship Code; proxy holder - Article 1121 of the Family and Guardianship Code; temporary caretaker; Article 25 of the Act on assistance to citizens of Ukraine in connection with armed conflict in the territory of that country.

violates the rights, freedoms and personal rights of children and/or interferes with their optimal development.

6. Forms of child abuse:

- **Physical violence** against a child is violence by which a child suffers actual physical harm or is potentially at risk of such harm. The harm is caused as a result of an act or omission by the parent or another person in charge of the child, or whom the child trusts or has authority over the child. Physical violence against a child may be a repeated or one-off act.
 - **Psychological violence** against a child is a chronic, non-physical, harmful interaction between a child and a caregiver, involving both actions and inactions. It includes, but is not limited to: emotional unavailability, emotional neglect, a relationship with the child based on hostility, blaming, denigration, rejection, developmentally inappropriate or inconsistent interactions with the child, failure to recognise or acknowledge the child's individuality and psychological boundaries between parent and child.
 - **Sexual exploitation of a child** is the involvement of a child in sexual activity, which the child is not capable of fully understanding and giving informed consent to, and/or to which the child is not developmentally mature and cannot consent in a legally valid manner, and/or which goes against the legal or moral norms of a given society. Sexual exploitation occurs when such activity occurs between a child and an adult or a child and another child, where those persons, by reason of age or degree of development, are in a relationship of care, dependence, authority. Sexual abuse can also take the form of **sexual exploitation**, that is, any actual or attempted abuse of a position of vulnerability, power advantage, or trust, for sexual purposes, including, but not limited to, the financial, social or political gain from the sexual exploitation of another person. A particular threat of sexual exploitation occurs during humanitarian crises. The threat of exploitation exists against both children and their caregivers (defined in the UN Bulletin ST/SGB5/2003/13).
 - **Child neglect** is the chronic or incidental failure to meet a child's basic physical and psychological needs and/or to respect their basic rights, resulting in disruption to their health and/or developmental difficulties. Neglect occurs in a child's relationship with a person who has a duty of care, upbringing, concern and protection to the child.
7. **Offence against a child** - all offences that can be committed against adults and, in addition, offences that can only be committed against children (e.g. sexual abuse under Article 200 of the Criminal Code³. Due to the specific nature of the Accommodation Facilities, where seclusion can easily be obtained, the offences most likely to occur on their premises will be offences against sexual freedom and morality, in particular rape (Article 197 CC), sexual exploitation of insanity and helplessness (Article 198 CC), sexual exploitation of dependence or critical position (Article 199 CC), sexual exploitation of a person under 15 years of age (Article 200 CC), grooming (seduction of a minor by means of distance communication - Article 200a CC).
8. **Other forms of child abuse** than the commission of a criminal offence to the detriment of a child - all forms of violence used against a child that do not meet the characteristics of a criminal offence prosecuted by public prosecution (e.g. shouting, humiliation, tugging, name-calling, neglect of needs, etc.).
9. **An employee** is a person employed under a contract of employment or performing work on the basis of a similar agreement (e.g. mandate, B2B, contract for specific work), as well as intern, trainee, volunteer, etc.
10. **An employee working with children** is any person who performs tasks or is delegated to perform tasks related to the upbringing, education, recreation, treatment, provision of psychological counselling, spiritual development, sports or the pursuit of other interests by minors or for taking care of them.
11. **Entrepreneur** - the body/entity/person managing a Facility or a network of Facilities, responsible for the proper operation of the Facility in formal terms.

³ The Act of 6 June 1997 Criminal Code (i.e. Journal of Laws of 2022, item 1138, as amended).

CHAPTER I. EMPLOYEES

General principles

1. Film Hotel Sp. z o.o. undertakes to educate its employees on the circumstances indicating that a child staying in the Facility may be harmed and in the scope of quick and appropriate responses to such situations. The facility can implement the above-mentioned education through various forms of training, e.g. external, internal, e-learning, educational materials developed by the hotel and available to employees, educational materials available free of charge, developed by other organisations.
2. Before being allowed to work, each employee is familiarised with the SOM, which is confirmed by them with a statement and commitment to comply with the rules and procedures contained in this document. **Appendix no. 7**
3. Employees working with children are subject to cyclical training, which is documented by the employer.
4. Film Hotel Sp. z o.o. undertakes to take into account the situation of children with disabilities and children with special educational needs, adapting the guidelines from **Appendix no. 13** to its specificity and scope of operation.

Hiring/delegating people to work with children

1. Pursuant to the Act on counteracting sexual-based crime and the protection of minors, Film Hotel Sp. z o.o. as an employer conducting, among other things, business regarding the organisation of rest, is obliged to obtain information on whether the persons employed are listed in the Sex Offender Registry and to obtain information from the National Criminal Register on the persons employed in the scope of:
 - a) Chapter XXV of the Criminal Code – Offences against sexual freedom and morality;
 - b) Chapter XIX of the Criminal Code – Offences against life and health;
 - c) Article 189a of the Criminal Code – Offences related to human trafficking;
 - d) Article 207 of the Criminal Code – Offences related to physical or mental abuse;
 - e) Act of 29 July 2005 on Counteracting Drug Addiction.The legal basis for the processing of these personal data is Article 6(1) B and C in connection with the Article 10 of the GDPR. This information will be attached to the employee documentation of each person employed and stored at the time provided for the employee documentation.
2. The persons to whom working with children is to be entrusted on the designated positions (**Appendix no. 1**) must demonstrate that they have not harmed any child in the history of their employment.
3. Prior to the establishment of an employment relationship or admission to work with children, any such person shall be subject to verification in the Sex Offender Registry. This also applies to minors, i.e. under 18 years of age. Verifying the person in the Registry takes place by obtaining a printout of the search results of a person in the "Restricted Access Registry", which is then inserted in the personal files of the person that is being verified. The scope of personal data necessary for verification in the Registry can be found in **Appendix no. 2**.
4. Any person newly employed/delegated to work with children, also a minor employee, must provide information from the National Criminal Register in respect of the offences specified in Chapters XIX and XXV of the Criminal Code, Article 189a and Article 207 of the Criminal Code and in the Act of 29 July 2005 on Counteracting Drug Addiction (Journal of Laws of 2023, item 172 and of 2022, item 2600), or for the corresponding offences prohibited by foreign law.
5. Any person newly employed/delegated, regardless of nationality, must also declare under pain of criminal liability the state(s) of residence in the last 20 years, other than the Republic of Poland and the country of citizenship. **Appendix no. 3**
6. If a newly employed/delegated person is of nationality other than Polish, they should also submit information from the criminal record of that State of which they are a national, obtained

for the purposes of professional or voluntary activities related to contacts with children, or information from the criminal record, if the law of that State does not provide for the issuing of information for the above-mentioned purposes.

7. If the law of the country to which the information on criminal record is to be submitted does not provide for the issue of such information or does not keep a criminal record, then the newly employed/delegated person shall submit a statement on this fact and the criminal record under pain of criminal liability. **Appendix no. 4**
8. Under the statements referred to in paragraphs 5 and 6 a newly employed/delegated person submits the following declaration: "I am aware of the criminal liability for making a false statement." This statement replaces the instruction of the authority on criminal liability for making false statements.
9. In the case of using third party services (e.g. outsourcing), a contract with the third party should include a relevant provision which will enable the enforcement of the relevant statutory obligation in the scope of checking by this entity of its employees regarding working with children. This provision will make it possible to control the fulfilment of this obligation under pain of immediate termination of the agreement or the application of other sanctions for breach of the terms and conditions of the agreement in this respect. **Appendix no. 5**

Scope of competences and responsibilities of persons appointed to implement Minors Protection Standards

1. Supervision over the use of the SOM is carried out by the Entrepreneur.
2. The Entrepreneur appoints the SOM Coordinator (hereinafter referred to as the "**Coordinator**").
3. The Coordinator is the person responsible for familiarising the employees with the content of the SOM and monitoring their application in the Film Hotel Sp. z o.o.
4. The Coordinator organises and documents the process of education of employees with regard to the recognition of symptoms that the child staying in the Facility may be harmed and quick and appropriate responses to such situations, in accordance with the procedures adopted by the Facility.
5. The coordinator describes each intervention or reported event related to the child's harm within the Facility in a document that is created for this purpose (e.g. event log or register of interventions).
6. If there is a reasonable suspicion that an offence has been committed, the Coordinator is responsible for securing evidence, including CCTV footage, and forwarding it to the public prosecutor or police if requested by the service in the form of a copy by registered mail or in person.
7. The Coordinator is responsible for carrying out the procedure when there has been harm to a child by a member of the Facility staff or other adult who is not directly employed by Film Hotel Sp. z o.o., but by a third party.
8. The coordinator is responsible for monitoring and updating the SOM and their availability both for employees, guests and other entities cooperating with the Facility.
9. The coordinator's details are available to all employees and guests of the Facility, including children.
The data must include information on how to contact the Coordinator (e-mail address, telephone, availability: days and work hours).

Principles of safe employee - child relations

1. All employees of the Film Hotel Sp. z o.o. are obliged to obey by the following rules.
2. The fundamental principle of all actions taken by employees in contact with children located in the Film Hotel Sp. z o.o. is to treat the child with respect and take into account their dignity and needs.
3. Employees and other adults are not allowed to use violence in any form.

A. Behaviours and practices expected of employees

- Be patient and respectful in your communication with a child.
- Listen carefully to the child and give them answers that are adequate to their age and situation.
- Ensure the child that if they feel uncomfortable in some situation, they can tell you or another designated person that and get help, let them know then where the SOMs are in the Facility in a version they understand. Ensure that, if they have any questions, they can reach out to you or any other designated person.
- Treat all children equally regardless of their sex, sexual orientation, ability/disability, social, ethnic, cultural, religious status and worldview.
- Nurture safe space If there are children in the area where you are working, make sure the equipment and facilities are used as intended and the environment is safe.
- If you see a child/children left unattended and the situation may indicate a child's safety risk, take action to find the parent/guardian.

B. Behaviour and practices unacceptable on the part of employees in relation to children in the Facility

- Do not shout, shame, humiliate, disregard nor insult the child.
- Do not hit, push or in any way violate the physical integrity of the child. unless there is a threat to the child's health or life.
- You must not engage with a child of any romantic or sexual relations or make any inappropriate proposals to them. This also includes sexual comments, jokes, gestures and the sharing of erotic and pornographic content with children in whatever form.
- You must not record the child's image for private or business purposes (recording, photographing) without the consent of the child's parents/guardians and the consent of the child themself. This also applies to allowing third parties to record the image of children. An exception is the situation, in which the image of the child is only a detail of a whole, such as a gathering, a landscape, a public event, then the consent of the child's parent/guardian is not required.
- You must not make contact with the child through private communication channels (private phone, email, instant messaging, social media profiles) or meet the child outside the workplace.
- You are not allowed to offer alcohol, tobacco products or illegal substances to the child.
- Never touch the child if they do not want it or in a way that can be considered as obscene or inappropriate.
- Do not stay in one room (e.g. hotel room/restaurant/bar) alone with a minor. Make sure that there is a guardian in the room before you enter the room.

If you witness any of the above-mentioned behaviours and/or situations from other adults or children, inform the person responsible at the Facility for the implementation and monitoring of the SOM or your immediate supervisor. The persons responsible for the SOM are:

✓ **Aleksandra Dudaszek – HR and Payroll Specialist**

✓ **Monika Wiktorek – HR and Payroll Specialist**

E-mail address to the above persons SOM@doubletreelodz.pl , tel.: 530 325 407.

Each intervention related to the minor shall be immediately reported to the Coordinator in person or by phone and additionally to the e-mail address SOM@doubletreelodz.pl describing the event in accordance with with the Intervention Card template attached as Appendix no. 15.

CHAPTER II. IDENTIFICATION PROCEDURE DURING REGISTRATION IN THE RECEPTION

1. One of the forms of effective prevention of child abuse is to determine the identity of the child staying in the Hotel and its relation to the adult with whom they are staying in the Hotel.
2. In order to identify the child and its relationship with the person with whom they are staying in the Hotel, it is necessary to:
 - a. ask for the child's identity document. An example of a conversation with an adult during identification is attached as Appendix no. 8. Documents that can be used for identification are: identity card, school ID card, MObywatel mobile application, IKP Internet Patient Account, court decision. **If the adult does not have any of the above-mentioned documents, they should be asked to make a relevant statement in accordance with the specimen attached as Appendix no. 14.**
3. In the event of a refusal on the part of an adult to show the child's document and/or to complete the above-mentioned declaration, it must be explained that the procedure serves to ensure the safety of children using the Hotel and that, in accordance with the provisions of the Act of 13 May 2016, Hotel employees must comply with the provisions on the rights of the child. Once the matter has been clarified in a positive manner, the Guest should be thanked for the time taken to ensure that the child is well looked after.
4. If the adult wishes to cancel the accommodation service due to the required procedures and leave the Hotel with the child, the reception staff member should try to alleviate the situation and offer to register the adult with the child without the need for a statement or provision of data. At the same time, once the check-in process has been completed and the adult has gone to the room, the reception staff member reports to the supervisor, as there is a risk that the child may be harmed on the Hotel premises. The supervisor makes decisions on further actions: whether to observe the adult or to call the police, which may carry out the identification and verification of the adult and the child, with whom the adult is staying.
5. If, during the course of the conversation, suspicions arise about an adult and their intention to harm the child, in particular if they refuse to show identification or the child does not have it and refuses to make a written statement, this should be discreetly communicated to the supervisor and security staff in such a way as not to arouse suspicion (for example, you could refer to the need to use the equipment at the back of the reception area, asking the adult to wait with the child in the lobby, restaurant or elsewhere).
6. From the moment when the first doubts arise, both the child and the adult should be in the sight of the staff member as far as possible and they should not be left alone.
7. The supervisor who has been notified of the situation takes over the conversation with the adult in order to obtain further explanations.
8. If, during the conversation, the suspicion that a crime against the child has been attempted or committed is confirmed, the supervisor shall notify the police. Further, the procedure as in the case of circumstances indicating harm to the child is applied (see Chapter IV).
9. If unusual and/or suspicious situations are witnessed by employees of other departments e.g. cleaning service, room service, bar and restaurant staff, relaxation area, security and others, they should immediately notify the supervisor or, in their absence, the decision-maker who will take appropriate action (see points 7 and 8 above).
10. Depending on the situation and place, the supervisor verifies if the suspicion that a child is being harmed is justified. To that end, they shall take appropriate measures to clarify the situation or decide to carry out the intervention and notify the police.
11. After such intervention, the event should be reported to the Coordinator in person or by phone and additionally to the e-mail address SOM@doubletreelodz.pl describing the event in accordance with the Intervention Card template attached as Appendix no. 15. The coordinator shall describe the event in the intervention register.

CHAPTER III. PROCEDURE TO BE FOLLOWED WHEN ADMITTING MINORS TO EVENTS HELD AT THE WYTWÓRNIĄ CLUB

1. People admitted to the premises of Wytwórnia Club and the events taking place there are:
 - a) adults without restrictions,
 - b) minors until the age of 16 under the direct care of a legal guardian or a person authorised by the legal guardian,
 - c) minors over the age of 16 under the responsibility of their legal guardians.
2. Minors entering the event in the Wytwórnia Club should have a photo ID document, which will enable checking the age of the minor.
3. Employees working on event organisation at the Wytwórnia Club are required, in the case of a person whose appearance indicates an age under 16, to verify that they are under the care of a legal guardian or an adult authorised by them. Persons under the age of 16, or those who do not have an identity card and appear to be under the age of 16, without a guardian are not allowed in for events at the Wytwórnia Club.
4. Employees working on event organisation at the Wytwórnia Club should remain vigilant and pay attention to situations that cause concern. Examples of situations that may raise suspicions or indicate that a child is being harmed are listed in **Appendix no. 10**.
5. If the employee has doubts whether a child is being harmed, from the moment such doubts arise, both the minor and the adult should be if possible, within the range of sight of the Wytwórnia Club employee and should not be left alone.
6. The employee should inform about the situation their supervisor, who takes over the conversation with the adult in order to obtain further explanations.
7. If, during the conversation, the suspicion that a crime against the child has been attempted or committed is confirmed, the supervisor shall notify the police. Further, the procedure as in the case of circumstances indicating harm to the child is applied (see Chapter IV).
8. If unusual and/or suspicious situations are witnessed by employees of other departments, e.g. cleaning service, bar staff, security and others, they should immediately notify the supervisor or, in their absence, the decision-maker who will take appropriate action (see points 6 and 7 above).
9. Depending on the situation and place, the supervisor verifies if the suspicion that a child is being harmed is justified. To that end, they shall take appropriate measures to clarify the situation or decide to carry out the intervention and notify the police.
10. After such intervention, the event should be reported to the Coordinator in person or by phone and additionally to the e-mail address SOM@doubletreelodz.pl describing the event in accordance with the Intervention Card template attached as Appendix no. 15. The coordinator shall describe the event in the intervention register.

CHAPTER IV. PROCEDURE IN THE EVENT OF CIRCUMSTANCES INDICATING THAT A CHILD IS BEING HARMED BY AN ADULT

1. A reasonable suspicion of a child's harm occurs when:
 - a. the child told a Facility employee about the abuse,
 - b. the employee observed the abuse,
 - c. signs of violence are visible (e.g. scratches, bruises) and when asked about them, the child responds in an incoherent and/or chaotic way and/or becomes uneasy or there are other circumstances that may indicate the harm, e.g. finding pornographic material with children in an adult's room.
2. An employee who has reasonable suspicion that a child staying in the Facility is or has been harmed, should immediately notify the supervisor/decision maker, who shall notify the police. In the case of an existing threat to the child's safety, an employee who has a justified suspicion of a child abuse, shall immediately notify the police by calling 112 and describing the circumstances of the event. Notwithstanding the above, the employee shall notify the Facility Coordinator about the event. Examples of situations that may raise suspicions or indicate that a child is being harmed are listed in **Appendix no. 10**.

3. Efforts must be made to hinder or even prevent the child and the suspect from leaving the Facility.
4. In the case set out in the Code of Criminal Procedure, a civilian apprehension of a suspected person may be conducted. In such a situation, until the police arrives, the person shall remain under the supervision of security personnel or other employees of the Facility who may perform such activities without risking their health or life⁴.
5. In any case, care must be taken to ensure the safety of the child. Child, if possible, should remain under the care of the employee until the police arrives. An attempt should be made to support the child, as far as possible. **Appendix no. 11**
6. 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 be prevented, if possible, from washing and eating/drinking until the police arrive.
7. Once the police have taken care of the child, the CCTV footage and other relevant evidence (e.g. documents) relating to the incident should be secured and forwarded to the Coordinator, who will forward a copy by registered mail or in person to the prosecutor or the police upon request of the service.
8. After such intervention, the event should be reported to the Coordinator in person or by phone and additionally to the e-mail address SOM@doubletreelodz.pl describing the event in accordance with the Intervention Card template attached as Appendix no. 15. The coordinator shall describe the event in the intervention register.

CHAPTER V. PROCEDURE IN THE EVENT OF SUSPECTED OR ESTABLISHED CHILD ABUSE BY A MEMBER OF STAFF OR ANOTHER ADULT

1. If it is suspected that a child is being harmed by an employee or another adult who is not directly employed by Film Hotel Sp. z o.o., but by a third party, the person who becomes aware of this information should immediately inform the Coordinator of this fact and, in their absence, another person designated for this purpose.
2. If the life or health of the child is compromised, the person who has become aware of this should immediately notify the police by calling the emergency number 112, provide their own data, data of the child (if possible), the place of stay of the child and a description of the circumstances of the case and notify the supervisor/decisive person who informs the guardian/parents of the child.
3. A person who has become aware of the event shall report it to the Coordinator in person or by phone and additionally to the e-mail address SOM@doubletreelodz.pl describing the event in accordance with with the Intervention Card template attached as Appendix no. 15. The coordinator shall describe the event in the intervention register.
4. If a member of staff has committed a form of harm to a child other than committing a criminal offence against the child, the Coordinator, on becoming aware of this, should investigate

4 Article 243. of the Code of Criminal Procedure [Civilian apprehension]

§ 1. Everyone has the right to apprehend a person in the act of committing an offence or in a pursuit undertaken immediately after the commission of an offence, if there is a fear of concealment of that person or if his or her identity cannot be established.

§ 2. The person captured should be immediately handed over to the Police.

In order for a particular apprehension (colloquially an arrest) to be considered a so-called civilian apprehension, the following prerequisites must be met:

1/ catching the perpetrator in the act of committing the offence or as a result of a directly undertaken pursuit, thus an insufficiently justified suspicion of suspicion or intention to commit the offence is not sufficient, i.e. in principle one must have witnessed the offence, or there will be such circumstances that clearly indicate and justify the assumption that the person fleeing, moving away, is the perpetrator,

2/ the perpetrator cannot be identified or the perpetrator is feared to be in hiding.

It is also necessary to immediately transmit the apprehended person to the police.

Civilian apprehension is temporary, only for the time needed to hand the suspected person over the police.

Unjustified extension of the detention and failure to notify the police may result in accusations of a custodial offence or a violation of personal rights, which results in compensation, as well as leads to liability if the damage to property was caused.

all the circumstances of the case, in particular by listening to the member of staff suspected of harm and other witnesses to the incident. If the violation of a child's welfare is significant, in particular if there has been discrimination or a violation of the child's dignity, the Coordinator should recommend to the person in charge of the Facility appropriate personnel action in relation to that staff member.

5. If the person who has been harmed is not directly employed by the Film Hotel Sp. z o.o., but by a third party (e.g. outsourcing), they should be prohibited from entering the Facility premises and, if necessary, the agreement with the third party should be terminated.

CHAPTER VI. PROCEDURE IN THE EVENT OF OTHER FORMS OF CHILD ABUSE BY A PARENT/LEGAL GUARDIAN OR OTHER ADULT

1. If the child is harmed by a parent/legal guardian or another adult with whom the child is in the Facility, each employee who is witnessing such a harm should react firmly.
2. If the life or health of the child is compromised, the person who has become aware of this should immediately notify the police by calling the emergency number 112, provide their own data, data of the child (if possible), the place of stay of the child and a description of the circumstances of the case and notify the supervisor/decisive person. A person who has become aware of the event shall also inform the Coordinator, at least by an e-mail/in a written form.
3. If a member of the Facility staff 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. Possible forms and ways of responding to the behaviour of the parent/caregiver/other adult towards the child can be found in **Appendix no. 12**.
4. If a child is left unattended, and their appearance indicates that they are under age of 7, the employee who learned about such an event should inform their supervisor about it. A child without care is also a child whose caregivers are under the influence of alcohol or other drugs. The supervisor who has been notified of the situation decides on further proceedings, taking into account the circumstances and taking into account the context of the provisions of the Criminal Code and the Code of Offences⁵. Depending on this, the supervisor shall attempt to locate the parent/legal guardian or other adult with whom the child is on the premises and explain that they cannot leave the child unattended. If finding the parent/legal guardian or other adult with whom the child is present in the Facility is not possible, or the parent/legal guardian/other adult does not want or/or is unable to take care of the child, the supervisor shall notify the police. In any case, care must be taken to ensure the safety of the child.
5. After such intervention, the event should be reported to the Coordinator in person or by phone and additionally to the e-mail address SOM@douletree.lodz.pl describing the event in accordance with the Intervention Card template attached as Appendix no. 15. The coordinator shall describe the event in the intervention register.

CHAPTER VII: MONITORING AND EVALUATION OF DATA THE MINORS PROTECTION STANDARDS

1. The Entrepreneur appoints a Coordinator responsible for the Minors Protection Standards used in Film Hotel Sp. z o.o. and places their contact details in a place that is easily accessible to the employees and guests of the Facility, including children.
2. The entrepreneur determines the scope of tasks and competences of the Coordinator relating to preparing employees to apply the provisions of the SOM, the rules of preparing employees for their application and the manner of documenting these activities.
3. The coordinator referred to in the preceding point shall, every two years, monitor and evaluate of the SOM.

⁵ Criminal Code Art. 160 par. 1 and 2; Art. 210 par.I, Code of offences Art. 106

4. Monitoring and evaluation include verification of the implementation of Standards, reacting to signs of violation of rules and procedures and proposing changes to the document, especially in terms of adapting them to the current needs and of their compliance to applicable laws.
5. The Coordinator shall conduct a survey among the employees of the Film Hotel Sp. z o.o., once every 2 years, to monitor the level of implementation of the SOM. The form of the survey is attached as **Appendix no. 9**.
6. In the questionnaire, employees may propose changes and indicate violation of the rules and procedures of the SOM in the Facility.
7. The coordinator analyses the employee questionnaires and prepares a monitoring report on this basis, which is then submitted to the entrepreneur. The entrepreneur introduces the necessary changes to the document and announces the new wording of the Minors Protection Standards to the employees.

Final provisions

1. Minors Protection Standards come into force on 15 August 2024.
2. Minors Protection Standards are made available to all employees by publishing them on the Film Hotel Sp. z o.o. website and in the HR and Payroll Department.
3. Minors Protection Standards are made available to the guests by placing them on the website www.doubemelodz.pl and at the hotel reception.
4. Minors Protection Standards are available in an intelligible and abbreviated version for children staying in the Film Hotel Sp. z o.o. in a place for them available at the hotel reception.

List of appendices:

- ✓ **Appendix no. 1** List of employees' positions in the hotel Facility, subject to verification in the context of child protection.
- ✓ **Appendix no. 2** The scope of data to be checked in the Sex Offender Registry of a person newly employed/delegated to work with minors.
- ✓ **Appendix no. 3** Model declaration on countries of residence in the last 20 years.
- ✓ **Appendix no. 4** Model declaration of no criminal record.
- ✓ **Appendix no. 5** Template of the content of the clause in the agreement between an outsourcing company and Film Hotel on the application of child protection standards and which will make it possible to enforce the statutory obligation to check their employees with regard to working with children.
- ✓ **Appendix no. 6** List of persons employed under civil-law contracts having direct contact with minor interns.
- ✓ **Appendix no. 7** Statement on having read the Minors Protection Standards.
- ✓ **Appendix no. 8** An example of a conversation with an adult and a child during identification.
- ✓ **Appendix no. 9** Survey monitoring the level of implementation of the SOM.
- ✓ **Appendix no. 10** Examples of situations that may raise suspicions or indicate child abuse.
- ✓ **Appendix no. 11** How to talk to a child victim of a crime - guidelines for the Facility employees.
- ✓ **Appendix no. 12** Methods of responding to the behaviour of a parent/caregiver/other adult towards a child.
- ✓ **Appendix no. 13** Guidelines for the Minors Protection Standards to the extent taking into account the situation of minors with special educational needs, including disability.
- ✓ **Appendix no. 14** Declaration of custody of a minor.
- ✓ **Appendix no. 15** Intervention card.

Appendix no. 1 List of employees' positions in the hotel Facility, subject to verification in the context of child protection.

Work post categories:

1. staff member working **DIRECTLY** with the children, e.g. running classes and providing care for minors in the Facility – **the obligation to verify the employee in the Sex Offender Registry and the required certificate from the National Criminal Register in Poland and other countries, if applicable.**
2. staff member has **INDIRECT** contact with a minor in the Facility - **no verification obligation.**

Work post description	Form of employment	Category	Scope	Comment
Administrative and office (sales, marketing, booking, accounting, IT, management assistant)	FTE/ civil-law agreement / outsourcing	Indirectly	Minor Visitor, Minor intern, Minor student	employees with access to sensitive data, who do not have direct contact with the minor, takes responsibility for the intern
HR	FTE	Directly	Minor intern, Minor student	employees with access to sensitive data, who do not have direct contact with the minor, takes responsibility for the intern
Gastronomy Managers: Head of the Gastronomy Department, Deputy Head of Gastronomy, Head of Restaurant and Bars	FTE	Directly	Minor intern	during serving meals in the restaurant room (a minor stayed under the care of a parent/guardian), during the catering service (a minor stayed under the care of a parent/guardian), during the event (a minor stayed under the care of a parent/guardian), takes responsibility for the intern
Breakfast	FTE	Directly	Minor intern	during serving meals in the restaurant room (a minor stayed under the care of a parent/guardian), during the catering service (a minor stayed under the care of a parent/guardian), during the event (a minor stayed under the care of a parent/guardian), takes responsibility for the intern
Breakfast	civil-law agreement / outsourcing	Indirectly	Minor intern	during serving meals in the restaurant room (a minor stayed under the care of a parent/guardian), during the catering service (a minor stayed under the care of a parent/guardian), during the event (a minor stayed under the care of a parent/guardian), takes responsibility for the intern
Banquets	FTE/ civil-law agreement / outsourcing	Indirectly	Minor Visitor, Minor intern, Minor student	during serving meals in the restaurant room (a minor stayed under the care of a parent/guardian), during the catering service (a minor stayed under the care of a parent/guardian), during the event (a minor stayed under the care of a parent/guardian), takes responsibility for the intern
Technical Department	FTE/ civil-law agreement / outsourcing	Indirectly	Minor Visitors, Minor Intern	in the event of fixing a malfunction in the room during the guests' stay (a minor may be in the room, but a parent/guardian is always with them)
Gastronomy	FTE/ civil-law agreement / outsourcing	Indirectly	Minor Visitor, Minor intern, Minor student	during serving meals in the restaurant room (a minor stays under the care of a parent/guardian), during the catering service (a minor stays under the care of a parent/guardian), takes responsibility for the intern
Housekeeping	FTE	Directly	Minor intern	in the case of the service in the room during the Guest's stay (the minors may stay in the room, but there is always a parent/guardian), takes responsibility for the intern
Housekeeping	civil-law agreement / outsourcing	Indirectly	Minor Visitors	in the case of the service in the room during the Guest's stay (the minors may stay in the room, but there is always a parent/guardian with them)
Housekeeping	civil law agreement – only the persons listed in Appendix 6	Directly	Minor intern	in the case of the service in the room during the Guest's stay (the minors may stay in the room, but there is always a parent/guardian), takes responsibility for the intern
Kitchen	FTE	Directly	Minor intern, Minor student	during serving meals in the restaurant room (a minor stays under the care of a parent/guardian), during the catering service (a minor stays under the care of a parent/guardian), takes responsibility for the intern
Kitchen	civil law agreement / outsourcing / B2B contract	Indirectly	Minor intern, Minor student	during serving meals in the restaurant room (a minor stays under the care of a parent/guardian), during the catering service (a minor stays under the care of a parent/guardian), takes responsibility for the intern
Reception	FTE/ civil-law agreement / outsourcing	Directly	Minor Visitor, Minor intern, Minor student	only in the case of providing information to a minor, e.g. a child walked away from a parent/guardian (it is lost), takes responsibility for the intern
Manufacturing	FTE/ civil-law agreement / outsourcing / B2B agreement	Directly	Minor Visitor, Volunteer.	during concerts and events organised in the Wytwornia Club, takes responsibility for the intern
Management Board	appointment	Directly	Minor Visitor, Minor intern, Volunteer, Minor student	in the case of acting as a host
Security	B2B Contract	Directly	Minor Visitor, Minor intern, Volunteer	in urgent situations requiring emergency intervention
Medical services	B2B Contract	Directly	Minor Visitor, Minor intern, Volunteer	in urgent situations requiring medical intervention
SPA employee	B2B Contract	Directly	Minor Visitors	In the case of performing procedures by a given employee, a minor person working directly
OHS services	B2B Contract	Directly	Minor intern, Volunteer	during OHS training
Handling of Events, e.g. communion, children events	B2B Contract	Directly	Minor Visitors	during events organised in the Hotel
CARE Committee	volunteering	Directly	Minor Visitor, Minor intern, Minor student	during meetings organised by the CARE Committee

Appendix no. 2 The scope of data to be checked in the Sex Offender Registry of a person newly employed/delegated to work with minors.

The scope of data of the newly employed/delegated person, necessary for verification in the Sex Offender Registry.

Full name:

Date of birth:

PESEL number:

Family name:.....

Father's name:.....

Mother's name:.....

.....

(date and legible signature)

The register is available at: <https://rps.ms.gov.pl/>

Appendix no. 3 Model declaration on countries of residence in the last 20 years

....., on

DECLARATION ON COUNTRIES OF RESIDENCE

I declare that I have lived in the following Member States over the last 20 years:

-
-
-
-
-

Concurrently, I am submitting the criminal records information of these countries obtained for professional or voluntary activities related to contact with children/criminal records information /declaration(s) of no criminal record.

I am aware of the criminal liability for making false statements.

** mark the appropriate point*

.....

(date and legible signature)

Appendix no. 4 Model declaration of no criminal record

.....
place and date

Declaration of no criminal record

I,..... PESEL no. / passport no.
.....

declare that in the country of my citizenship, i.e. there is no criminal record maintained/
information from the criminal record is not issued [*cross out as appropriate*]. I declare that:

- I declare that I have not been validly convicted in the country for criminal offences corresponding to the offences defined in Chapters XIX and XXV of the Criminal Code, Article 189a and Article 207 of the Criminal Code and in the Act of 29 July 2005 on Counteracting Drug Addiction and that,
- no other judgment has been issued against me stating that I have committed such prohibited acts, and that
- no obligation has been imposed on me by a court decision, other authorized body or by law to comply with the prohibition to hold any or specified positions, to practice any or specified professions or activities related to upbringing, education, recreation, treatment, provision of psychological counselling, spiritual development, practice of sports or pursuit of other interests by minors, or to the care of minors.

I am aware of the criminal liability for making false statements.

.....
(date and legible signature)

Appendix no. 5 Template of the content of the clause in the agreement between an outsourcing company and Film Hotel on the application of child protection standards, which will make it possible to enforce the statutory obligation to check their employees with regard to working with children and to implement SOM in them if there is a legal obligation to do so.

"Company..... (here the name of the entity) declares that the employees and co-workers who are employed or allowed to work in (name of the entity) to perform work with children, have been verified in terms of criminal record in the Sex Offender Registry and provided the required certificate from the National Criminal Register in Poland and from other countries (if applicable). At the Hotel's request, (name of the entity) agrees to make available for inspection the above-mentioned documents. (name of the entity) confirms its responsibility for the performance of the obligations specified in Article 21 of the Act of 13 May 2016 on counteracting terrorism-based crime and the protection of minors and undertakes to direct to work at Film Hotel persons who may perform activities within the scope of activities related to upbringing, education, leisure, treatment, provision of psychological counselling, spiritual development, sports or the pursuit of other interests by minors, or with the care of minors, only those who have not been convicted of sexual offences and have not been convicted of offences defined in Chapters XIX and XXV of the Criminal Code, in Art. 189a and Article 207 of the Criminal Code and in the Act on Counteracting Drug Addiction of 29 July 2005, or for corresponding offences specified in the laws of the foreign country of which the person referred to work is a citizen, and in the laws of the foreign countries where the person referred to work has resided in the last 20 years.

Company..... also declares that it has implemented and applied in its company Minors Protection Standards, provided that it is obliged to do so by law.

Company undertakes to inform all the persons referred to and admitted to work in the Hotel or the Wytwórnia Club and to oblige them to observe the Minors Protection Standards in force at the Film Hotel Sp. z o.o.

Failure to perform any of the above obligations justifies termination by the Hotel of this Agreement without notice, due to the fault of (name of the entity) and the request of the Hotel to pay a contractual penalty in the amount of In addition, if the non-performance of any of the above obligations by (name of the entity) resulted in claims against the Hotel, or imposing any penalties or fees on the Hotel, (the name of the entity) will satisfy such claims and reimburse the Hotel the expenses incurred by the Hotel in connection with such claims, as well as reimburse the Hotel the equivalent of penalties or fees imposed."

Appendix no. 6 List of persons employed under civil-law contracts having direct contact with minor interns:

A list of persons employed under civil law contracts in the cleaning department who have direct contact with minor interns is available to authorised persons in the HRs and Payroll Department of Film Hotel Sp. z o.o.

Appendix no. 7 Statement on having read the Minors Protection Standards.

Place, date

I declare that I have read the Minors Protection Standards in force in Film Hotel Sp. z o.o. and I undertake to comply with them.

.....

(date and legible signature of the employee)

Appendix no. 8 Example of a conversation with an adult during identification

- ✓ During the conversation with the adult, stay calm, be polite and patient.
- ✓ At the start of the conversation, it is recommended to inform the adult that the Facility follows Minors Protection Standard and therefore it is the responsibility of the staff member to verify the identity and their relationship to the adult accompanying the child. This is also in line with the Minors Protection Act.
- ✓ There may be situations in which the adult will feel uncomfortable, express their opposition or dissatisfaction. This does not necessarily mean that they are a potential criminal.

Example of a conversation with the guest:

"Does the child have identification with them? [Film Hotel Sp. z o.o. follows the Minors Protection Standards, so during the registration process we kindly ask you to present the child's and the accompanying person's identification documents]" (ID card, passport, other, allowing you to establish the child's identity).

If the child does not have a document or after checking it, there is no certainty that the adult is the legal guardian of the child, give the adult the following questions to help assess the situation:

- Are you a legal guardian of the child? Do you have a document authorising you to care for the child?
 - Do you have a certificate from parents of the child that they are in your custody?
-
- In any situation where we cannot identify the child's identity and the relationship between them and the adult who accompanies them, ask the person to fill in the declaration referred to in Chapter II item 3, sub-point c, attached as **Appendix no. 14**.
 - If an adult makes it difficult to communicate with the child, is unwilling to give the child's details or complete the statement, the adult should be offered to talk with the supervisor.
 - If the adult wishes to cancel the accommodation service due to the required procedures and leave the Hotel with the child, the reception staff member should try to alleviate the situation and offer to register the adult with the child without the need for a statement or provision of data. At the same time, once the check-in process has been completed and the adult has gone to the room, the reception staff member reports to the supervisor, as there is a risk that the child may be harmed on the Facility premises. The supervisor makes decisions on further actions: whether to observe the adult or to call the police, which may carry out the identification and verification of the adult and the child, with whom the adult is staying.

Appendix no. 9 Survey monitoring the level of implementation of the Minors Protection Standards.

Question content	yes	no	comments
1. Do you know content of the Minors Protection Standards against child abuse?			
2. Do you know what situations might indicate that a child is at risk of being harmed?			
3. Do you know the procedures for responding to suspicions or establishing that a child is being harmed on the Facility premises?			
4. Have you observed any violation of the rules contained in the Minors Protection Standards against child abuse?			
a) If yes, what rules have been breached? (descriptive answer)			
b) Did you take any action: if so - what, if not, why? (descriptive answer)			
5. Do you have any suggestions for changes to the Minors Protection Standards against child abuse? (descriptive answer)			

Appendix no. 10 Examples of situations that may raise suspicions or indicate a child's harm

ATTENTION! The occurrence of certain events does not automatically mean that a minor is harmed. It is important to remain vigilant and pay attention to situations that cause concern. A situation of concern will also be one in which the relationship between the adult and the child does not appear comfortable and caring.

RECEPTION

The guest does not want to give their personal data or the child's data.	The guest takes the child directly to the room and gives the impression if they did not want the child to communicate with the person working at the reception.
The guest states that they do not have their and/or the child's documents; they do not want to give an explanation.	The guest who checks in with a child invites other persons who are not guests of the Facility (such persons may appear for a short period of time).
The guest with a child pays in cash or with prepaid cards. They pay every day (do not know how long they are going to stay) or asks someone else to pay for their stay.	The guest is renting a room for hours or not for the whole day; or rents a room for a very long period.
Guests have gadgets or items that can be passed on to children as gifts.	A guest who arrives with a child either has no luggage or arrives with very little luggage (carry-on bag/briefcase).
The guest arrives at the Facility with a child, with which they did not check previously at the reception.	A guest behaves towards a child in a sexually charged manner and the relationship between the adult and the child does not appear natural and caring.
A guest who is not the child's parent rents a room in which there are fewer beds than people checking in, e.g. a marriage bed.	The child is dressed in a manner inappropriate for the weather or inappropriate in relation to the adult with whom they have come to the hotel.
During the check-in, the child seems to be uneasy, stressed or forced to stay in the Facility with the adult.	Children selling small items or begging outside the Facility.
The child arrives at the Facility late at night or at a time when they should be at school.	The child does not know where they are or, when asked about their destination, gives inconsistent answers.
The adult checking in with the child, does not allow the receptionist to make direct contact with the child - they answer for the child, do not allow the child to speak.	The child appears to be under the influence of drugs or alcohol (disturbed and erroneous vision, balance problem, slurred speech, unresponsiveness to stimuli).

RESTAURANT & BAR

A guest comes to a bar or restaurant with a child not registered in the Facility.	Outsiders, not registered in the Facility, seem to be looking for clients and offering them something (possibly wanting to broker contacts for the children).
A guest inquires about adult sexual services, including with young people (e.g. overheard conversation in a bar or restaurant).	Teenagers are waiting at the table or in a bar to the adult who receives them and does not seem to be their parent or guardian (possible that this is a client, procurer or a human trafficker).
Children who appear to be without care are asking for food, beverages or money.	An exchange of cash between an adult and a child (the exchange may raise suspicion of transfer of the remuneration for the services).
Children seem to be uneasy, stressed and avoid eye contact .	During the stay, the adult and the child do not come to the breakfast room for breakfast.
An adults behaves towards a child in a sexually charged manner - it is not a natural and caring relationship	An adult gives alcohol to a child.

FLOOR SERVICE

A "Do Not Disturb" sign is always hanging on the door of the room where children are staying.	Lack of consent to room cleaning for the entire stay of the guest. ⁶
A lot of banknotes/cash spotted in the room (can indicate illegal payments).	Children left unattended for a long time in the room, or do not leave the room at all (e.g. food is brought to them).
Computers, mobile phones, card readers were spotted in large numbers in the room.	An adult and children do not leave room, almost never leave or leave only in hours when few guests move around the Facility.
There are children's clothes or toys in the room, even though the child has not been registered in the Facility.	Adults that are not guests of the Facility are in the lobby, watch their surroundings and contact a guest who arrived with a child.
A large amount of alcohol or drugs spotted in a room where an adult has checked in with a child.	There are condoms, drugs, etc. pornographic material left in a room where an adult has checked in with only a child/children, left in a visible place.

⁶ The Facility may include in the guest terms and conditions that, for the safety of all guests of the Facility, staff may request access to the room in any situation that requires it.

WYTWÓRNIA Club

An adults behaves towards a child in a sexually charged manner - it is not a natural and caring relationship, e.g. rubbing on a minor during events in the Wytwórnia Club.	An exchange of cash between an adult and a child (the exchange may raise suspicion of transfer of the remuneration for the services).
An adult gives alcohol to a child.	An adult adds substances of unknown origin to a minor's drink that may impair the child's judgement.
An adult records an image of bystander minors during events at the Wytwórnia Club.	The child appears to be under the influence of drugs or alcohol (disturbed and erroneous vision, balance problem, slurred speech, unresponsiveness to stimuli).

Appendix no. 11 How to talk to a child victim of a crime - guidelines for employees.

If a situation arises in the Facility where an intervention is made to save a child's health or life, or where a child themselves discloses abuse - **the safety of the child must be the primary concern.** Until the arrival of the police or other emergency services, the child should be in the care of the employee.

Such a situation may cause severe stress in the child and lead to different reactions, such as:

- stimulation and panic,
- escape behaviours aimed at drawing attention to the difficult situation: undermining of situation, laughter, other behaviours which appear inadequate,
- aggression, autoaggression, regressive behaviours (rocking, hand clenching),
- the impression of confusion or being lost,
- the impression of a withdrawal, being silent, limited movements or a lack thereof,

Every contact with a child victim requires delicacy and empathy.

Child, which has suffered a lot of bad from adults, is very mistrustful. For a long time, they may have experienced a sense of strong life-threatening danger, may feel that they are not in control of their own destiny, are helpless and frightened.

Children who have experienced sexual exploitation are often convinced that other adults do not believe their accounts and they are afraid that they will be blamed and considered a “bad” person. In addition, the child feels responsible for the fact of being used, which causes a great sense of guilt.

As a result of manipulation on the part of the perpetrator, the child sees them as a person who has an exceptional impact, which no one can protect the child from. Sometimes perpetrators threaten the child that if they testify against them, “something bad” may happen to them or people close to them. The perpetrators are often force the child to remain silent. They use arguments that lull the child into a sense of guilt, telling them that they are co-responsible for what has happened or convince them that if they tell someone about the abuse, no one will believe them and the perpetrator will escape the punishment.

Child - a victim of trafficking is often a witness of violence, crimes, and it also happens they themselves are forced to commit them. The perpetrator takes advantage of this by frightening the child that they will face punishment from law enforcement authorities. As a result, the child, intimidated, defends and excuses the perpetrator. In cases of extreme threat of life, the victim may develop the Stockholm syndrome. This syndrome is a result of psychological responses to strong stress, which may cause the child to begin cooperating with the perpetrator, or even start to treat them as their guardian.

GENERAL RULES FOR ESTABLISHING CONTACT WITH YOUNGER CHILDREN

- Lower yourself to the child's level, i.e. try to be at the child's eye level (sit opposite/ bend down, etc.).
- Address the child by name, if possible.
- Talk slowly, with a calm voice, clearly.
- Use simple language.
- Keep eye contact.
- Observe whether the child understands you.
- When asking questions, use phrases used by the child.

RULES FOR TALKING WITH A CHILD - VICTIM OF ABUSE

- When approaching a child, introduce yourself first.
- Accept and acknowledge their reactions and feelings. Be attentive to non-verbal expressions of the child's feelings - embarrassment, restraint, shame, fear, terror, sadness, guilt.

- React for those feelings, thus helping the child to cope with them: “I think you are stressed, it is natural in such a situation”; “people usually get ashamed when they talk about such experiences”, “feel free to cry, crying helps”.
- Inform the child about what will happen next. Don’t lie, don’t give them false information, don’t promise things that may not happen.
- Offer support: “Is there anything I can try to help you with?”
- Ask if they want to contact someone close.
- Accept the refusal.
- Provide discretion, but inform them that in the event of a crime there may be circumstances in which you will be obliged to disclose information to the relevant authorities.
- Show the child interest and kindness, take the time.
- Listen more and talk less - it is important to give the child a time to be heard. Don’t be afraid of silence, endure it.
- Give them a space to say what they want to say.
- Do not ask for details. When asking a question, ask yourself what is its purpose - - it is intended to satisfy your curiosity or whether it is intended to help deepen the contact, obtain an important information needed to provide help.
- Let the child feel that you believe them.
- Assure the child that they are not responsible for what has happened.
- Do not judge. Do not ask questions that include judgement: e.g. "why didn't you call for help/run away?", "why did you believe them", "why did you agree to this if you knew...?". etc. As a general rule, this creates a sense of guilt in the child, as well as makes it difficult for them, because they often don’t understand the causes of their own behaviour and the behaviour of other people. Additionally, you do not know the situation and experiences of the child that could have influenced their behaviour.
- Do not hug the child, do not touch the child, unless they ask for it - physical contact can horrify them and cause them to "shut down", touch can have negative connotations and awaken traumatic memories, especially in the context of previous abuse.
- If possible, give the child a choice between having a conversation with the employees of both sexes.

Appendix no. 12 Methods of responding to the behaviour of the parent/caregiver/other adult towards the child.

If you see a violent behaviour towards a child on the part of a parent or guardian - the child is being pushed, insulted, humiliated, beaten (e.g. punished with a spank)? React!

Your reaction to the abuse restores a sense of security to the child and gives them a chance for a better future. It can also protect the health and even life of the child!

How can you react:

NOTICE THE BEHAVIOUR

Let them know that you have noticed a situation in which a child is being harmed. Making eye contact may be a sufficient response to stop the violent behaviour of a parent, caregiver or other adult accompanying the child. Don't be afraid to observe. You have the right to look at what is happening in the Facility or the public space.

MAKE CONTACT

When the parents are acting on such a strong feeling that they cannot stop using violence against their child, it is hard to get through to them using reasonable arguments. If you want to react effectively, try calm down the tension.

Ask a simple question e.g.: "I am sorry, has something happened?"

You can also refer to your own experience, e.g. "I remember when my children were that age. It is a very difficult time. Is there something I can help you with?"

Sometimes it is enough to say out loud: "I see that you are having a difficult time" or "Everyone sometimes has a bad day and it is hard to get along then."

The attempt to engage in such a conversation alone can give the parents food for thought and stop the violence against the child. This may also be the start of a further discussion leading to calming the situation.

CALL OUT THE VIOLENCE

Avoid criticising and attacking but don't be afraid to call things out.

Calmly but firmly talk about what has disturbed you - for example: "I see that you hit the child", "Please do not hit the child. Please never do so."

Appendix no. 13 Guidance on the Minors Protection Standards with regard to the situation of minors with special educational needs⁷ including disabilities

The intention of Film Hotel Sp. z o.o. is to prevent the exclusion of children with special educational needs, including with disabilities. The overriding principle is to care for the welfare of every child, because every child has their unique needs and resources.

I. General principles

- 1) Every minor should be treated with due respect and not discriminated against because of any characteristics, including special needs, disability, race, sex, religion, colour, national or ethnic origin, language, marital status, sexual orientation, health, age, abilities, political beliefs or social status.
- 2) Every minor should be shown concern for their well-being.

III. Relations between employees and minors

1) Identification of the minor's situation

The task of the Facility employees is to identify the situation, including special needs of the minor. Information on the minor provided by parents (caregivers) should be taken into account.

2) Unacceptable behaviour on the part of employees

- a) Discussing in the presence of unauthorised persons the situation of the minor, including their family situation, health situation, etc.
- b) Depreciating comparisons with others;
- c) Disregarding or superficial, inattentive treatment of the support and assistance needs reported by the minor.
- d) A passive attitude of employees in a situation when the child's well-being is threatened.

3) Procedure for responding to difficult, aggressive or violent behaviour on the part of a minor.

The purpose of the procedure is to ensure the safety of all minors and adults staying in a facility/institution/business in the event of a threat to the safety, health and life of such persons.

⁷ Regulation of the Minister of National Education of 9 August 2017 on the principles of organising and providing psychological and pedagogical assistance in public kindergartens, schools and institutions (Journal of Laws of 2023, item 1798 as amended) Special educational needs are also defined as specific needs (see the Act of 19 July 2019 on ensuring the availability of people with special needs, Journal of Laws of 2019, item 1696 as amended), individual educational needs, development and educational needs, etc.

The concept of special educational needs has been introduced by Mary Warnock in The Warnock Report. Special Education Needs published in 1978 in London by Her Majesty's Stationery Office. Warnock proposed the transition from the medical categorisation of pupils and their deficits to a more functional social language to understand their needs.

Scope of application of the procedure:

- violation of the physical integrity of other persons;
- psychological violence, violation of personal dignity;
- physical fights and assaults;
- creating a threat to health and life and others;
- threats of violence;
- handling a hazardous object;
- destruction of property.

Responsibilities:

- each employee may notice or be informed of the occurrence of acts of aggression, violence;
- each employee is obliged to respond in the situation of aggression, violence (it is a witness or a person informed of the event), i.e. inform their supervisor and the security who will attempt to intervene and ensure the safety of persons: witnesses, the abuser and the abused;
- the application of the response procedure shall be followed by informing the person designated to take emergency action, which will then take care of the case or any other decision-making person (e.g. director, specialist).

**IMPLEMENTATION PROCESS OF THE RESPONSE PROCEDURES
TO DIFFICULT, AGGRESSIVE
OR VIOLENT BEHAVIOUR ON THE PART OF A MINOR**



- in the case of observation of increased tension, nervousness or difficulties in the minor creating the probability of difficult behaviour, including aggressive, self-aggressive, threatening behaviour, it is necessary to take immediate steps in order to counteract its development, including having a calming conversation with the minor, calming down, if possible, on a neutral subject (method of redirecting attention) or other soothing/calming actions and informing immediately the minor's guardian of the situation;



- in the event of highly aggressive behaviour that cannot be stopped and poses a threat to the health and life of oneself and others, the minor's guardian should be notified immediately and, if necessary, first aid should be given, the Emergency Medical Service or the Police should be called,
- the safety of everyone involved in the incident, including witnesses, should be ensured;

Appendix no. 14 Declaration of custody of a minor.

Dear Guests,

in order to comply with the obligations imposed on our Hotel by the law on combating threats to sex crime and the protection of minors, we request that the following statement be filled in. The legal basis of our request and at the same time the legal basis for the processing of personal data contained therein is Article 6(1)(c) of the GDPR.

The Administrator of personal data included in the statement is Film Hotel Sp. z o.o. with its registered office in Poland, in Łódź at ul. [st.] Łąkowa 29. You can contact our Data Protection Officer by sending an e-mail to the following address: iod@doubletreelodz.pl

Statements are kept for 12 months, and at that time you have the right to request the APD to access and rectify the personal data and, in certain situations, to request their erasure or restriction of processing.

You can find more information about the processing of your personal data on the website: <https://u.profitroom.com/2019-doubletreelodz-pl/uploads/Politykaprywatnoci2020.pdf>

Place, date

I, the undersigned:

- ✓ First and last name of the guardian.....
- ✓ Address of residence
- ✓ PESEL number

declare that I have custody of the minor:

- ✓ First and last name of the child.....
- ✓ Address of residence of the child
- ✓ PESEL number of the child.....

and have the consent of the child's parents/legal guardians for this custody. At the same time, I declare that

I am of that minor (please specify the relationship between the child and the adult).

.....

(date and legible signature of the guardian)

Appendix no. 15 Intervention card.

1. First and last name of the child			
2. Reason for intervention			
3. Person reporting suspected abuse			
4. Form of intervention (specify the appropriate)	1) notification of suspicion of an offence – notification to the police, <input type="checkbox"/> 2) notification to the supervisor:(First and last name of the supervisor) <input type="checkbox"/> 3) other type of intervention - what? <input type="checkbox"/>		
5. Intervention details	<table border="1" style="width: 100%;"> <tr> <td style="width: 50%; text-align: center;">(name of the requested authority)</td> <td style="width: 50%; text-align: center;">(date of intervention)</td> </tr> </table>	(name of the requested authority)	(date of intervention)
(name of the requested authority)	(date of intervention)		
6. Result of intervention - actions taken by the police and the supervisor, if the employee was informed about the results of the intervention			

_____ date and signature of the person filling the card