

ORDER No. 1/2024 of the President of PI Companies

PI Management sp. z o.o.

PI Hotele sp. z o.o sp.k

PI Hotele sp. z o.o. Św. Marka sp.k

PI Apartments sp. z o.o

Garni Hotel sp. z o.o

The Crown sp. z o.o

of 18.07.2024

**On the introduction of standards for the protection of minors in hotels and flats
of the PI Group**

Pursuant to:

Article 22b and Article 22 c of the Act of 13 May 2016 on counteracting the threat of sexual offences and the protection of minors (i.e. Journal of Laws 2024 item 560), it is ordered as follows:

§ 1

The Standards for the Protection of Minors in Hotels and Apartments are adopted for application.

§ 2

All hotel and flat employees are obliged to implement the issues contained in this Order.

§ 3

The Ordinance comes into force on the date of its signing.

Table of contents

CHAPTER I.....	3
EXPLANATIONS OF TERMS AND CONCEPTS USED IN THE STANDARDS.....	3
CHAPTER II.....	5
PRINCIPLES TO ENSURE SAFE RELATIONS BETWEEN MINORS AND HOTEL/APARTMENT STAFF.....	5
CHAPTER III.....	7
RECOGNISING AND RESPONDING TO FACTORS OF RISK OF HARM TO MINORS.....	7
CHAPTER IV.....	8
PRINCIPLES AND PROCEDURE FOR INTERVENTION IN SITUATIONS OF SUSPECTED ABUSE OF A MINOR.....	8
CHAPTER V.....	10
RULES ON THE PROTECTION OF THE IMAGE OF MINORS.....	10
CHAPTER VI.....	10
RULES CONCERNING INTERNET ACCESS AND MOBILE PHONE USE ON HOTEL PREMISES.....	10
CHAPTER VII.....	11
RULES ON UPDATING THE STANDARD OF PROTECTION OF MINORS AND TERMS OF REFERENCE FOR PERSONS RESPONSIBLE FOR THE TRAINING OF STAFF IN THE APPLICATION OF STANDARDS FOR THE PROTECTION OF MINORS.....	11
CHAPTER VIII.....	11
RULES ON MAKING THE STANDARDS AVAILABLE TO PARENTS AND MINORS FOR THEIR FAMILIARISATION AND APPLICATION.....	11
CHAPTER IX.....	11
FINAL PROVISIONS.....	11

Legal acts on the basis of which the Standards for the Protection of Minors in the hotel / flats are based

1. the Act of 13 May 2016 on counteracting the threat of sexual offences and the protection of minors;
2. the Act of 28 July 2023 amending the Act - Family and Guardianship Code and certain other acts (Journal of Laws of 2023, item 1606);
3. the Convention on the Rights of the Child adopted by the United Nations General Assembly of 20 November 1989 (i.e. Journal of Laws of 1991 No. 120, item 526 as amended).

CHAPTER I

EXPLANATIONS OF TERMS AND CONCEPTS USED IN THE STANDARDS

§ 1

Whenever these Standards refer without further specification to:

- 1) the **Director** - it shall be understood to mean the Director of the hotel / flats;
- 2) **Unit** - shall be understood to mean the Hotel / Suites;
- 3) **employee** - shall be understood as a person employed under a contract of employment or a civil law contract.
- 4) Unit co-operating **partner** - it shall be understood to mean persons who perform tasks commissioned on the premises of the hotel / flats under separate regulations;
- 5) **minor** - it shall be understood, in accordance with the Civil Code, as a person from birth to the completion of 18 years of age;
- 6) **guardian of a minor** - it shall be understood as a person authorised to represent and decide on a minor, in particular his/her legal representative;
- 7) **statutory representative** - it shall be understood as a parent or a guardian with full parental authority or a legal custodian (a person representing the child, appointed by the court, in the situation when the parents have no parental authority or when the parents are deceased)
- 8) **consent of a minor's guardian** - shall be understood as the consent of at least one of the minor's parents. However, if there is no agreement between the minor's guardians, they should be informed that the case should be decided by the family court;
- 9) **harm to a minor** - it shall be understood as committing an illegal act or a criminal act to the detriment of a minor by any person, including a hotel employee, or a threat to the minor's well-being, including his/her negligence;
- 10) **personal data of a minor** - it shall be understood as any information allowing identification of a minor using the services of a hotel
- 11) **person in charge of Minor Protection Standards** - it shall be understood as an employee appointed by the Director to supervise the implementation of these Standards;
- 12) **child abuse** shall be understood as the commission of a criminal act to the detriment of a child by any person, including a member of staff, or a threat to the welfare of a child, including neglect of a child. It is any intentional or unintentional action/inaction by an individual, institution or society as a

whole and any result of such action or inaction that violates the equal rights and freedoms of children and/or interferes with their optimal development, including:

13) **emotional (psychological) violence** against a child is a chronic, non-physical, harmful interaction between a child and an adult, involving both actions and inactions. It includes, but is not limited to: rejection, developmentally inappropriate or inconsistent interactions with the child, failure to recognise or acknowledge the child's individuality and the psychological boundaries between adult and child, emotional unavailability, emotional neglect, a relationship with the child based on hostility, blaming, denigration. Manifestations of emotional abuse may include forcing the child to be active beyond his/her physical capabilities, making the child's worth dependent on his/her performance in sport, realising the coach's or carer's ambitions against the child's needs.

14) **physical violence** against a child is violence where a child suffers actual or potential physical harm. This harm occurs as a result of an act, or failure to act, by a parent or other person who is responsible for the child, or whom the child trusts or has authority over. Physical violence against a child can be a repeated or one-off act. It also includes physical punishment such as staying in one position for long periods of time, performing exercises that do not derive from a sporting objective (including those that exceed the child's capacity) but are used for disciplinary purposes.

15) **Peer violence** (peer aggression, bullying): occurs when a child experiences various forms of violence from peers, either directly or using communication technologies, social media. It occurs when the action is intended to cause someone distress or harm (intentionality), is systematic (repetitive) and the victim is weaker than the perpetrator or group of perpetrators. It includes verbal violence (e.g. name-calling, teasing, ridicule), relational violence (e.g. exclusion from a group, ignoring, setting others against a person), physical violence (e.g. beating, kicking, pushing, pulling), material violence (e.g. physical (e.g. beating, kicking, pushing, shoving), material (e.g. stealing, damaging objects) and electronic (malicious texting or e-mailing, posting pictures or videos ridiculing the victim on the Internet), as well as dating violence by boyfriends/girlfriends, sexual abuse - touching intimate parts of the body or being forced into sexual intercourse or other sexual acts by a peer, violence based on gender norms and stereotypes.

16) **Sexual violence** (child sexual abuse) is the involvement of a child by an adult and/or another child in sexual activity without physical contact (e.g. exhibitionism, any form of verbal harassment e.g. having conversations with sexual content inappropriate to the age of the child or making sexual comments about the child's appearance and behaviour, sexualisation of games and images, solicitation of contact with pornographic content, grooming - grooming on the internet in order to establish contact) or with physical contact such as touching, forcing the child to touch the perpetrator's body in a sexual manner or sexual intercourse. Any sexual activity with a child under 15 years of age is a criminal offence. Sexual exploitation occurs when such activity occurs between a child and an adult or a child and another child, if these persons, due to age, disability or degree of development, are in a relationship of care, dependence, authority. Sexual exploitation can also take the form of sexual exploitation, which is any actual or attempted abuse of a position of vulnerability, power advantage, or trust, for sexual purposes, including, but not limited to, profiting financially, socially or politically from the sexual exploitation of another person. The threat of exploitation exists against both children and their carers, relatives, so-called family friends.

17) **Neglect**: is when no one makes the child feel important, special and loved, does not care for or support the child. The child's caregiver takes no interest in the child's health, nutrition or living conditions. Neglect is the failure to meet a child's basic needs and/or to respect the child's basic rights by parents, guardians, or other persons with responsibilities for the care, upbringing and protection of the child. It encompasses both isolated situations and a well-established way of functioning in which the caregiver fails to provide adequate conditions for the child's physical, cognitive, social, emotional and psychosexual development and well-being. This may include situations such as: lack of safe shelter, care, nutrition (calorie and value of meals adequate for exercise and training needs), amount

of sleep, recovery time after training or injury, equipment neglect (lack of appropriate clothing, shoes, sports goggles, etc.), basic and specialised medical care (including the performance of sports tests), vaccinations, access to education, not sending to school, not securing books and school aids, limiting social contacts, lack of attention to physical safety, failure to ensure emotional safety.

CHAPTER II

RULES ENSURING SAFE RELATIONS BETWEEN MINORS AND HOTEL STAFF

§ 2

1. The person responsible for preparing staff in the hotel to apply the Standards for the Protection of Minors is the Director.
2. The managers of the individual departments familiarise the employees with the Standards for the Protection of Minors and collect from each employee a declaration that he/she has familiarised himself/herself with the Standards for the Protection of Minors in force in the unit.
3. A model of the employee's statement is set out in **Annex 1** to this procedure.
4. Employees newly recruited to the hotel shall be familiarised with the standards during their first week of work and the statement referred to in paragraph 2 shall be taken from them at that time.
5. the persons responsible for the child protection policy implementing the child protection standards - Managers of the respective departments who supervise the correct application of the child protection standards in the hotel and their validity.
- 6 Principles for the safe recruitment of staff:
 - 1) The HR Department, before entering into an employment relationship with a person or before allowing a person to engage in any other activity related to the upbringing, education, recreation or care of minors, is required to obtain information on whether the person's details are included in the **Restricted Access Register** or the **Register of Persons** in respect of whom the State Commission for the Prevention of Sexual Exploitation of Minors under 15 years of age has issued a decision on entry in the Register;
 - 2) the HR Department collects from the candidate information from the National Criminal Register on no criminal record or a statement on not being in the database of the Sexual Offences Registry. A specimen of the declaration is specified in **appendix no. 2** to this procedure;
 - 3) if the candidate is a non-Polish citizen, he/she should also submit information from the criminal record of the country of his/her citizenship, obtained for the purposes of professional or voluntary activities related to contacts with minors, or information from the criminal record if the law of that country does not provide for the issuance of information for the aforementioned purposes, or a declaration of non-listing in the database of the Sexual Offenders Register;
 - 4) a statement on the country/countries (other than the Republic of Poland) in which the candidate has resided in the last 20 years is required from the candidate under pain of criminal liability. A specimen of the declaration on no criminal record is attached as **Annex 3** to these Standards;
 - 5) if the law of the country from which information on a clean criminal record is to be submitted does not provide for the issuance of such information or does not maintain a criminal record, then the candidate shall submit, under pain of criminal liability, a declaration to that effect together with a declaration that he/she has not been validly convicted and there is no other judgment against him/her in which he/she has been found guilty of such offences, and that he is not obliged, by virtue of a decision of a court, other authorised body or the law, to abide by a prohibition to hold any or certain

positions, to exercise any or certain professions or activities related to upbringing, education, leisure, medical treatment, provision of psychological counselling, spiritual development, sports or the pursuit of other interests by minors, or to the care of minors;

6) the following statement shall be made under penalty of criminal liability: I am aware of the criminal liability for making a false statement. The statement replaces the authority's instruction on criminal liability for making a false declaration.

§ 3

1. The principles of safe relations between employees in a hotel and its guests:

(a) the fundamental principle of all actions taken by staff is to act for the benefit and in the interests of the minor. The staff member shall treat everyone with respect and take into account their dignity and needs. It is unacceptable to use violence against minors in any form;

(b) the principles of safe staff relationships with minors apply to all staff, contractors, interns and volunteers;

(c) knowledge and acceptance of the principles shall be evidenced by the signing of a declaration, a specimen of which is attached as **Annex 1** to these Standards.

2. The employee shall maintain a professional relationship with minors and consider each time whether his/her response, message or action is appropriate to the situation, safe, reasonable and fair to others.

3. The employee, when interacting with minors:

(a) relates respectfully;

(b) listen to minors and try to give them a response appropriate to the situation and their age;

(c) shall not embarrass, belittle, humiliate or insult;

(d) does not shout unless a dangerous situation requires it (e.g. a warning);

(e) does not disclose sensitive information about a minor to unauthorised persons, including disclosure of his/her image.

4. Decisions concerning a minor should take into account the safety of other wards.

5. A minor has the right to privacy, any derogation from the rules of confidentiality must always be justified.

6. The employee shall keep confidential any information obtained in connection with his/her function or work concerning minors.

7. An employee shall not record images of minors for private purposes, including professional purposes, unless the guardian has given his/her consent.

§ 4

1. The employee shall ensure that minors receive assistance when they feel uncomfortable.

2. If the staff member notices a disturbing behaviour or situation, he/she is obliged to act in accordance with the Standards.

3. Any violent behaviour towards a minor participant on the hotel premises is not permitted.
4. Pushing, hitting, poking, etc. is not allowed.
5. A staff member must not touch a minor in a way that could be misinterpreted, unless the safety of the minor or other participants is at risk.
6. Physical contact with a minor must never be surreptitious or concealed, involve any gratification or be the result of a power relationship.
7. A staff member who is aware that a minor has suffered some form of harm, e.g. physical, psychological abuse or sexual exploitation, is required to exercise extreme caution in his/her dealings with the minor, showing understanding and sensitivity.
8. Where appropriate, physical contact between a staff member and a minor is permissible. Such situations include:
 - (a) assisting a minor with a disability in hygiene activities, if the type of disability requires it and the minor/ his/her guardian consents or the minor asks.
 - b) assisting a minor with a disability to move around the unit.

§ 5

1. Contact with minors outside working hours is generally prohibited.
2. It is not allowed to invite minors to one's place of residence, meetings with a minor or his/her guardian should take place within the unit.
3. If it is necessary to contact a minor, guardian outside working hours, the means allowed are:
 - (a) the company telephone;
 - (b) business e-mail;
4. If the staff member needs to meet with a minor outside the working hours of the unit (or his/her guardian), the Director or deputy must be informed and the guardian must consent to such contact.
5. Where the staff member has a family or social relationship with the minor or his/her guardian, he/she shall maintain complete confidentiality, in particular, with regard to matters concerning other minors, guardians and staff.

CHAPTER III

RECOGNISING AND RESPONDING TO FACTORS OF RISK OF HARM TO MINORS

§ 6

1. The Director of the Hotel is responsible for training subordinate employees in the protection of minors.
2. Each newly hired employee shall be obliged to undergo an initial training in the field of protection of minors as described herein, which shall be confirmed by a statement of acquaintance with this policy. A model of the declaration is attached as **Appendix 1**.
3. One of the forms of effective prevention of child abuse is the identification of the child in the facility and their relationship to the adult with whom they are in the facility. Staff shall take all possible steps to

carry out the identification of the child and their relationship to the adult with whom they are in the facility.

4. Each time an adult travelling with minors performs check-in operations at the Hotel reception, he/she is required to make a statement to identify the child and his/her relationship to the adult with whom he/she is staying in the facility on a form issued by the Reception staff. Model form - **Annex No. 5**.

5. Each employee of the Hotel is required to pay particular attention to the relationship between the minor and the person with whom he/she is staying at the Hotel, including particular attention to the child's behaviour towards the accompanying adult, the child's appearance, the child's behaviour e.g. restless, upset and avoiding eye contact, and the behaviour of the adult towards the child.

6. If the adult travelling with the child refuses to make a statement as described in paragraph (4), as well as if there are reasonable doubts about the safety of the child, it is imperative that the 'suspected child abuse procedure' is initiated :

1) Whenever possible, identify the child and his/her relationship with the adult with whom he/she is staying at the Hotel.

2) In unusual and/or suspicious situations when carrying out activities at the Hotel reception, indicating a possible risk of child abuse, a detailed identification is compulsorily carried out by a member of the Reception staff.

3) In order to make a detailed identification of the child and his/her relationship to the person with whom he/she is staying in the facility, it is necessary to:

(a) Ask for the child's identity and the child's relationship to the person with whom he/she has arrived at or is staying in the facility. To do this you may ask for the child's identity card or other document that shows that an adult has the right to have custody of the child in the facility. A list of sample documents is indicated in the footnote below. In the absence of an identity document, the child's details (name, address, PESEL number) may be requested.

(b) In the absence of documents indicating the relationship between the child and the adult, the adult and the child should be asked about this relationship.

(c) If the adult is not the child's parent or legal guardian, ask if the adult has documentary evidence of parental consent for the adult to travel with the child (e.g. a written statement).

(d) If the adult does not have a document of parental consent, ask for the telephone number of the above-mentioned in order to call and confirm the presence of the a) a child in the facility with a strange adult with the knowledge and consent of the parents/legal guardians.

4) If there is resistance on the part of the adult to show the child's document and/or indicate the relationship, explain that the procedure is to ensure the safety of children using the Hotel and has been developed in relation to the Act of 13 May 2016 on Prevention of Sexual Offences and Protection of Minors.

5) Once the matter has been clarified in a positive manner, thank the person for their time in making sure that the child is well looked after and reiterate that the procedure is designed to keep children safe.

6) If the conversation does not allay any doubts about the suspicion towards the adult and his/her intention to harm the child, discreetly inform the immediate supervisor and, in their absence, the Hotel Manager. In order not to arouse suspicion, you could, for example, invoke the need to use the equipment in the back room, asking the adult to wait with the child in a public space.

7) From the moment the first concerns arise, both the child and the adult should be under constant observation by staff and not left alone.

8) The supervisor who has been alerted to the situation will decide to notify the police or, if in doubt, take over the conversation with the suspected adult for further clarification.

9) If the conversation confirms the belief that a child has been attempted or committed, the supervisor shall notify the police of this suspicion. In such a case, the provisions of section IV of the procedure continue to apply.

10) In the event that unusual and/or suspicious situations are witnessed by employees of other departments of the Hotel e.g. cleaning service, room service, bar and restaurant staff and others, they shall immediately inform their immediate superior who will decide on appropriate action to be taken or in his/her absence immediately inform the Reception staff.

11) Depending on the situation and location, the supervisor verifies the extent to which 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.

7. The hotel monitors, educates and engages its staff to prevent child abuse to the extent of its resources and organisational capacity.

8. Staff receiving educational materials are required to familiarise themselves with them. The persons responsible for familiarising staff with the materials are the Department Managers.

9. The hotel shall make the educational materials available to staff free of charge.

CHAPTER IV

RULES AND PROCEDURE FOR INTERVENTION IN CASE OF SUSPECTED ABUSE OF A MINOR

§ 7

1. In the event of suspected abuse of a child, each staff member or co-worker of the hotel is obliged to immediately notify the Manager or the Deputy Manager of the situation. The staff member is then obliged to make a note of the situation - **Annex 4**.

2. In the case of suspected abuse of a child by another child staying in the hotel, the staff reacts and takes actions which will lead to ensuring the safety of the abused minor. The Director or deputy is notified of the incident and determines further action.

3. Where there is a suspicion of abuse of a child by an adult staying in the hotel, staff shall respond and take action which will lead to ensuring the safety of the abused minor. The Director or deputy is notified of the incident and determines further action, if necessary calling the police.

4. In the event of suspected abuse of a child by a relative/legal guardian, staff respond and take action that will lead to the safety of the abused minor. The director or deputy is notified of the incident and determines further action, if necessary calling the police.

5. Each report shall be treated with due seriousness and investigated. The hotel staff and associates involved in the intervention are obliged to keep confidential the information related to the situation being explained.

6. Each intervention starts with informing the child's guardian (if possible) of the suspected abuse, if this does not jeopardise the welfare of the child.

7. If a person becomes aware of suspected child abuse by staff or a colleague of the hotel, that person has a duty to report the situation immediately to the Director of the hotel in order to take steps to assess the situation.

8. The manager or the deputy manager will summon the member of staff or the member of staff of the

hotel towards whom the suspicion is directed and inform them of the report received, followed by an interview to assess the circumstances of the incident with a record of the findings of the interview.

9. Depending on the findings of the interview referred to above, a conversation is also held with the child and their carer in a safe space. All activities are documented in writing, which records the explanations of the participants in the proceedings.

10. In the event of becoming aware that an employee or associate of the hotel is committing a crime or offence to the detriment of a child, the Director of the hotel or a deputy is obliged to notify the Police immediately. This obligation is of a legal nature and derives from Article 304 of the Code of Criminal Procedure.

11. The child's guardians shall be notified immediately of the notification and a plan shall be established to assist and support the child adequately according to the child's needs, as agreed with the parents. The Director of the hotel may request assistance in agreeing the assistance plan from the Police or other public entities entitled to provide support in intervening in situations of suspected abuse of a minor.

§ 8

In the event that a staff member suspects that a minor is being abused, the staff member is obliged to make a memo and pass the information obtained to the Director of the unit.

§ 9

1. The Director should draw up a description of the situation and a plan for helping the minor.
2. The assistance plan should include indications concerning:
 - a) the actions to be taken by the unit in order to ensure the safety of the minor, including reporting the suspicion of abuse to an appropriate institution;
 - b) the support the unit will provide to the minor;
 - c) referral of the minor to a specialised child welfare centre, if necessary.

§ 10

1. The plan for assisting the minor is presented to the guardians with the recommendation to cooperate in its implementation.
2. Guardians are informed about the obligation of the centre to report suspected child abuse to a relevant institution (prosecutor's office/police or family court, social assistance centre depending on the diagnosed type of abuse and correlated intervention).
3. After informing the guardians - according to the preceding point - the director of the facility submits a notice of suspected criminal offence to the public prosecutor's office/police or a request for an insight into the family situation to the district court, family and juvenile department, social welfare centre.
4. Further proceedings are the responsibility of the institutions indicated in the preceding point.
5. If the suspicion of abuse has been reported by the child's guardians and the suspicion has not been confirmed, the guardians of the minor should be informed of this fact in writing.

§ 11

1. Whenever abuse of a minor is noticed, the Intervention Card, the model of which is **attached** as **Appendix No. 4**, shall be completed .

2. The Card shall be kept by the Headmaster in accordance with the binding regulations and rules on keeping and archiving documents.

CHAPTER V

PRINCIPLES OF PROTECTING THE IMAGE OF A MINOR

§12

1. The Hotel shall ensure the highest standards of protection of children's personal data in accordance with applicable laws and the Hotel's RODO Policy.
2. The Hotel, recognising the child's right to privacy and protection of personal rights, shall ensure the protection of the child's image guided by responsibility and consideration towards the recording, processing, use and publication of children's images.
3. In the case of the presentation of images in accordance with Article 81(2) of the Act of 4 February 1994 on Copyright and Related Rights, the good and dignity of the child must always be taken into account. Material containing an image of a child must not be derogatory or insulting to the child, show situations that appear ridiculous or inappropriate out of context, show transgressions of the intimate zone and nudity, or perpetuate stereotypes. In order to protect the child from actions that violate his/her welfare, during the recording:
 - (a) the child in the recording shall not be humiliated, ridiculed or shown in a negative context,
 - (b) photographs/recordings of the child should focus on the child's activities and, where possible, depict the child as a group, not individually.
4. Any information relating to the child, including the child's health, financial situation, legal situation and related to the child's image, must not be disclosed during the recording.
5. All suspicions and problems regarding inappropriate recording and dissemination of children's images must be recorded and reported to the Hotel Director or Reception Staff.

§13

1. Publicizing the image of a minor recorded in any form (i.e. photography, audio-video recording) by an employee requires the written consent of the guardian.
2. Before the image is recorded, the minor and the guardian must be informed of where the recorded image will be placed and in what context it will be used (e.g. that it will be placed on the website www.youtube.pl) for promotional purposes.
3. An employee must not allow media representatives to record the image of a minor (i.e. filming, photographing) on the hotel premises without the written consent of the minor's guardian.
4. It is unacceptable to provide media representatives with contact details of the minor's guardian without the knowledge and consent of that guardian.

CHAPTER VI

RULES OF INTERNET ACCESS AND MOBILE PHONE USE ON HOTEL PREMISES

§14

1. Minors do not have access to the network infrastructure of the hotel.
2. the network is password protected.
3. Anti-virus software is installed and regularly updated on all computers with internet access in the hotel - in accordance with the data protection policy.

4. Employees have an individual login and password for computer use on the hotel premises. Employees keep the login and password confidential.

§15

1. Minors have the right to use their mobile phone on the hotel premises.
2. Minors bring their own mobile phones to the hotel with the consent of their parent/legal guardian at their own risk. The hotel is not responsible for the loss, destruction of a mobile phone brought by a minor.
3. Minors are not allowed to use mobile phones during hotel activities unless there is an urgent need to contact the minor's legal guardian.
4. In the event of a minor's violation of the rules of using mobile phones on the hotel premises, the staff member shall immediately inform the minor's parents/legal guardians of this fact and together with the parents/legal guardians establish a plan for further proceedings.
5. In the case of participation in open events, minors shall comply with the provisions of the regulations specifying the rules of behaviour at the event specified in the regulations.

CHAPTER VII

RULES FOR UPDATING THE STANDARD OF PROTECTION OF MINORS AND THE SCOPE OF COMPETENCES OF PERSONS RESPONSIBLE FOR PREPARING STAFF TO APPLY THE STANDARD OF PROTECTION OF MINORS

§16

1. The procedure for updating the Standard shall take place at least once every 2 years.
2. The President of the Company shall appoint a person in charge of the Standards for the Protection of Minors and set a deadline for the review and update of the Standards .
3. The person designated by the President of the Company shall monitor the implementation of the Standards, coordinate changes to the Standards and submit proposals, draft amendments.
4. The person responsible for the implementation of the Standards is obliged to evaluate the Standards in order to adapt them to the current needs of the hotel. Ensuring their compliance with the legal regulations. The process of evaluation of the performance of the standards shall be documented by the person designated by the employer and proposals for the evaluation of the applicable standards shall be submitted.
5. If necessary, amendments to the applicable Standards are developed and submitted to the President of the Company for approval.
6. The President of the Company makes the necessary changes to the Standards and announces the new wording of the document to employees.
7. A register of notifications shall be kept by a person designated by the President of the Company.
8. He shall inform the President of the Company of each notification entered in the register in the manner adopted in the unit.

CHAPTER VIII

PRINCIPLES OF MAKING THE STANDARDS AVAILABLE TO PARENTS AND MINORS FOR THEIR FAMILIARISATION AND APPLICATION

§17

1. The document 'Standards for the Protection of Minors' is a document of the hotel generally available to the hotel staff, minors and their guardians.
2. The document is published on the website. The hotel takes into account the principles set out in the Standards when preparing event regulations.
3. A shortened - simplified version is prepared for minors, which constitutes attachment no. 7 to these Standards.

CHAPTER IX

FINAL PROVISIONS

§ 18

1. The Standards for the Protection of Minors shall come into force on the date of their announcement.
2. The announcement shall be made in a manner accessible to the staff, minors and their guardians, in particular by posting on the website, displaying in the office a summary version which contains relevant information for minors.
3. The Standards for the Protection of Minors are available in the office of the Director of the hotel, the hotel reception and the HR department.

Annex No. 1
to Order No. 1/2024
of the President of the Companies
regarding the introduction of the Standards of Protection
Minors in the hotel

.....
place, date

**DECLARATION OF KNOWLEDGE OF AND COMPLIANCE WITH THE PRINCIPLES CONTAINED
IN THE STANDARDS FOR THE PROTECTION OF MINORS IN THE HOTEL**

I,

declare that I have acquainted myself with (Order No. dated) **the Standards for the Protection
of Minors** applicable in the hotel and undertake to abide by their provisions.

.....
signature

Annex No. 2
to Order No. 1/2024
of the President of the Companies
regarding the introduction of the Standards of Protection of
Minors in the hotel

.....
place, date

DECLARATION

Declaration I, the undersigned, declare under the pain of criminal liability for making false statements pursuant to Article 233 § 1 of the Criminal Code that I am not listed in the database of the Register of Sexual Offenders with restricted access and I have not been convicted of any other intentional crime by a final court judgment

.....
signature

Annex No. 3
to Order No. 1/2024
of the President of the Companies
on the introduction of
Standards for the Protection of Minors in the Hotel

.....
place, date

DECLARATION OF THE COUNTRIES OF RESIDENCE

I,
PESEL no. /passport no.
declare that during the last 20 years I have resided in the following countries, other than the Republic
of Poland and the country of citizenship:

.....
At the same time, I submit information from criminal records of these countries obtained for the
purposes of professional or voluntary activity related to contacts with children/information from criminal
records.

I am aware of the criminal liability for making a false statement.

.....
(signature)

DECLARATION OF NO CRIMINAL CONVICTIONS

I,

declare that I have not been convicted of an offence against sexual freedom and decency, and violent
offences against a minor, and that there are no criminal or disciplinary proceedings pending against
me in this respect.

I am aware of the criminal liability for making a false declaration. This declaration replaces the
authority's instruction on the criminal liability for making a false declaration.

.....
(signature)

Annex No 4
to Order No. 1/2024
of the President of the Companies
regarding the introduction of the Standards of Protection
of minors in the hotel

HOTEL INTERVENTION CARD

Minor's name and surname		
Reason for intervention (form of abuse)		
Person reporting the intervention		
Description of actions taken by staff	Date	Action
Meetings with minor's guardians	Date	Action
Form of intervention undertaken	Notification to police Notification of a suspected crime Request for family insight Other type of intervention. What type?	
Intervention data (name of the authority to which the intervention was reported) and date of intervention		
Outcomes of interventions: actions of justice authorities, actions of the individual, actions of parents	Date	Action

.....
place, date

Annex 5
to Order No. 1/2024
of the President of the Companies
regarding the introduction of the Standards of Protection
of minors in the hotel

**REGISTER OF DISCLOSED OR REPORTED INCIDENTS OR EVENTS *ENDANGERING THE*
*WELFARE OF MINORS***

no.	Date of report/ event	Person reporting	Type of incident/ description of report	Signature of the person reporting	Signature of <i>the person responsible</i> for accepting the report	Notes

to Order No. 1/2024

of the President of the Companies

regarding the introduction of the Standards of Protection

of minors in the hotel

DECLARATION CONCERNING MINORS

Guest's first and last name:

Date of check-in:

Pursuant to the procedure for the protection of minors in force pursuant to Article 22c(3)(2) of the Act of 13 May 2016 on counteracting the threat of sexual offences and the protection of minors, I give the names of the minors accompanying me and the nature of the relationship between me and the minors:

Minor's first and last name	The nature of the relationship between the guest and the child

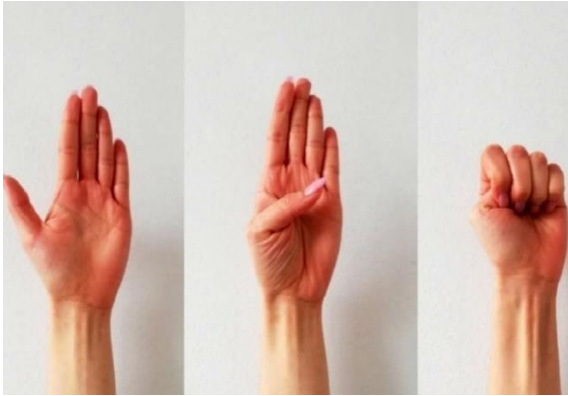
Guest's signature:

The provision of the data is necessary for checking in at the Hotel. As a consequence of failing to provide the data, the hotel staff may have to identify the child and his/her relationship with the adult with whom he/she is staying at the hotel and/or refuse to check in at the hotel. In the event that the above data cannot be identified, the hotel staff is entitled to notify the Police. The above measures are intended to protect children from harm, please respect the rules in force.

INFORMATION CLAUSE

1. The administrator of the personal data The administrator of the personal data is with registered office in, ul., NIP:, (hereinafter: 'Administrator').
2. Contact on Data Protection Contact on matters of personal data protection is possible at the mailing address indicated in point 1.
3. Purpose and legal basis for the processing of your personal data Data will be processed for:
 - 1) the implementation of the procedure for the protection of minors from abuse, introduced pursuant to Article 22c(3)(2) of the Act of 13 May 2016 on counteracting the threat of sexual offences and the protection of minors (Article 6(1)(c) of the RODO)
 - 2) the fulfilment of the Administrator's legitimate interest in demonstrating compliance with the principles of protection of minors referred to above (Art. 6(1. lit. f RODO).
4. We process the following personal data: Your name, the names of your children, the nature of the relationship between you and the accompanying children.
5. Information on the requirement/voluntariness of the provision of data The provision of personal data is necessary for the use of the hotel services. Consequences of not providing the data are indicated above.
6. Period of data processing The personal data will be processed for the same duration as the data contained in the registration card (see information clause on the back of the registration card).
7. Recipients of the data Data will not be communicated to third parties, with the exception of the authorities authorised to intervene in relation to the protection of minors.
8. rights of data subjects You have the right to
Access to your data and the right to request their rectification (when they are factually inaccurate),
 - 1) erasure, restriction of processing (in cases provided for by the applicable legislation).
 - 2) to the extent that the basis for the processing of your personal data is the legitimate interest of the Administrator, you have the right to object to the processing of your personal data.
 - 3) to the extent that the basis for the processing of your personal data is consent, you have the right to withdraw consent. The withdrawal of consent shall not affect the lawfulness of the processing until the consent is withdrawn.
 - 4) You also have the right to data portability, i.e. to receive personal data from the Controller, in a structured, commonly used, machine-readable format. The right to data portability does not apply to data which constitute a business secret, shall not adversely affect the rights and freedoms of others, including trade secrets or intellectual property, and will be exercised to the extent technically possible. The first copy of the data is free of charge.
- 5) Right to lodge a complaint with a supervisory authority: You also have the right to lodge a complaint with a supervisory authority, which is the President of the Office for the Protection of Personal Data (00-193 Warsaw, ul. Stawki 2, e-mail: kancelaria@uodo.gov.pl)
9. Automated decision-making: The data you provide will not be used in automated decision-making processes (including profiling).
10. transfer of data to third countries or international organisations: Data will not be transferred outside the EEA.

NOTICEBOARD VERSION



1. If you have received a report of suspected child abuse or have yourself observed worrying symptoms follow the established procedures i.e.:

- (a) inform your line manager - in writing or by telephone;**
- b) inform the relevant services.**

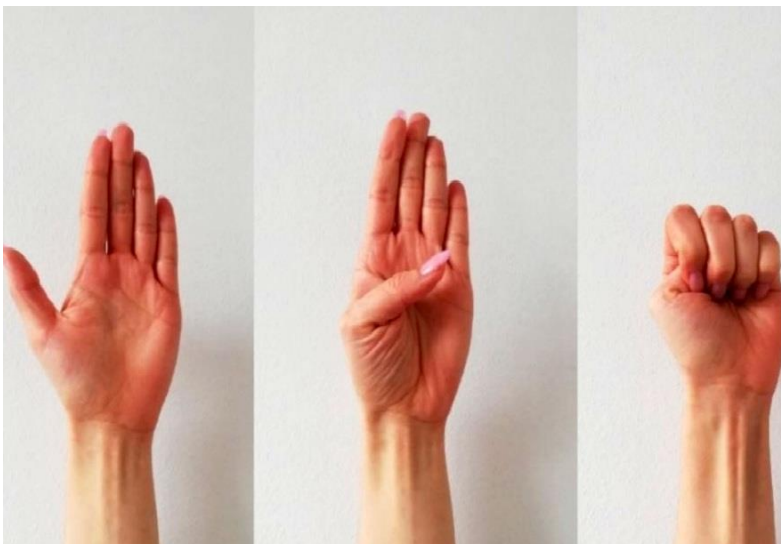
2. The primary aim of your action is to stop the abuse and ensure the safety of the child through quick and effective intervention. At the same time remember, that procedures do not take into account the interpretation of events, the complexity of life and the circumstances in which the same event may have a different course, causes and effects. When intervening, you must take into account the uniqueness of each situation and the need to adapt to its conditions. Carry out assistance to the abused child according to your competence in consultation with your supervisor and in cooperation with other services or institutions.

3. tell the abused adult you are being abused, we are here to help you

If you are an abused minor inform the HOTEL staff, DON'T BE AFRAID, YOU CAN USE THE SIGNS TO CALL FOR HELP

The international HELP ME sign is a discreet signal that we can send to someone we know or to a complete stranger. It indicates that the person making it is a victim of violence. The 'help me' sign is a call for help that is understood all over the world.

Making this sign is simple: Show an open hand. Fold your hand into a fist while tucking your thumb inside.



WHAT TO DO WHEN SOMEONE SHOWS US THE SIGN?

1. we should not give signs that something is wrong. Especially when we are being watched by a person who could potentially be the perpetrator. This could expose the victim to consequences.
2. end the meeting or conversation as if nothing had happened.
3. contact the police on the emergency number 112 and explain the situation and inform them that the person has asked for help in this way.

The person calling for assistance can be either an adult or a child. Particularly in the case of minors, be vigilant in recognising this sign, as making this call may be the only way to inform the outside world of the harm a child is experiencing.

Let us remember this international sign of a cry for help.

YOU ARE NOT ALONE

Helplines for people in distress:

- 0 800 12 01 48 - **'Stop the violence'** (toll-free number);
- 47 72 99 149 - **for terrorism cases**;
- 800 12 02 26 - **Police Helpline**.

Freephone line, open daily from 8:00 to 22:00;
Ø 116 111- **National helpline for children and adolescents.**

Ø 116 111 is an anonymous line. Calls are free of charge. The line is open 24/7.

7 days a week. More information on 116111.pl;

Ø 800 12 12 12 - **Children's Ombudsman Helpline**;

A telephone number aimed at all children in need of help. By calling this number you can speak to a specialist who will try to help you. The call is free of charge. The line operates from 8:15 a.m. to 4:15 p.m. More information on the website brpd.gov.pl

Ø 801 12 00 02 - **Blue Line. Victims of domestic violence.**

Calling the toll-free number will provide support and necessary assistance.

Ø 801 19 99 90 - **National Drug Helpline.**

On this number you will receive support if your problem is drugs and drug addiction. You can call either if the problem affects you or a loved one. The helpline is open every day from 4 to 9 p.m. You can also find information about drugs and drug prevention at www.narkomania.org.pl;

Ø 47 72 28 226 - **24-hour helpline of the National AIDS Centre.**

The phone is open from Monday to Friday from 9 a.m. to 9 p.m. For more information visit aids.gov.pl;

Ø 801 24 70 70 - **24-hour line of the ITAKA Centre for Missing People.**

From TP numbers, calls are charged only for the first impulse, regardless of the length of the call, from anywhere in Poland. The number for calls from abroad +48 22 654 70 70. The 24-hour line is staffed by ITAKA employees and volunteers ready to help when a person goes missing. More information on the website zaginieni.pl;

Ø 116 000 - a phone number to alert **you** when **a child or minor is missing**.

Operates 24 hours a day, 7 days a week <http://www.itaka.org.pl/>.

Ø 112 - emergency number.

Ø 'We Give Children Strength' Foundation [How we help - Site \(fdds.pl\)](http://fdds.pl/).