

## CHILD PROTECTION PROCEDURES AT LIV'INN APARTHOTEL

### Preamble

Acknowledging the United Nations guidelines on business and human rights, recognizing the significant role of businesses in ensuring respect for children's rights—particularly the right to dignity and protection from all forms of harm—HOME&TRAVEL S.C. has adopted this document as a framework for principles and procedures in cases where there is suspicion of harm to a child staying at Liv'Inn Aparthotel, and for preventing such risks. We will implement child protection policies at Liv'Inn Aparthotel through these principles.

- HOME&TRAVEL S.C. conducts its operations with the utmost respect for human rights, with particular attention to the rights of children as persons especially vulnerable to harm.
- HOME&TRAVEL S.C. recognizes its role in conducting socially responsible business and promoting positive social behavior.
- HOME&TRAVEL S.C. emphasizes the legal and social duty to report any suspected crimes against children to law enforcement authorities and commits to training its staff in this regard.
- HOME&TRAVEL S.C. commits to educating its staff on recognizing situations where a child staying on its premises may be harmed, and on how to respond swiftly and appropriately to such situations.
- One effective way to prevent child harm is to identify the child staying at the hotel and their relationship with the adult accompanying them. Staff take all possible steps to verify the child's identity and relationship with the accompanying adult.

### Procedure in Case of Suspected Child Harm

- Whenever possible, staff should identify the child and their relationship with the adult staying at the hotel.
- In unusual or suspicious situations suggesting potential risk of harm to the child, identification is mandatory and is conducted by the front desk staff. Examples of suspicious situations are provided in Appendix 1.
- To identify the child and their relationship to the accompanying adult, the following steps should be taken:
  - Request the child's identification (ID card, passport, or school ID) and record their details in the hotel guest register.
  - Ask about the child's relationship with the accompanying adult.
  - If there is no document establishing kinship between the child and the adult, ask both the adult and child about their relationship. A sample conversation guide is provided in Appendix 2.
  - If the adult is not the child's parent or legal guardian, ask if they have a document showing parental consent for the trip (e.g., a written statement).
  - If the adult lacks such a document, request a phone number for the parents/legal guardians to verify that the child is staying at the hotel with the adult's knowledge and consent.
- If the adult resists showing the child's identification or clarifying the relationship, explain that the procedure ensures the safety of children at Liv'Inn Aparthotel and was developed in consultation with NGOs specializing in child protection.
- Once the situation is clarified positively, thank the adult for their time and emphasize that the procedure aims to protect children's safety.
- If doubts about the adult's intentions towards the child remain, discreetly inform a supervisor and, if available, hotel security. To avoid arousing suspicion, suggest that the adult and child wait in the lobby, restaurant, or another area while citing a need to access equipment behind the reception.
- From the first moment doubts arise, both the child and the adult should remain under staff observation and should not be left alone.
- The supervisor who has been informed of the situation will decide whether to notify the police or, if there are uncertainties, take over the conversation with the suspicious adult for further clarification.
- If the conversation confirms suspicions of an attempted or committed crime against the child, the supervisor will notify the police. Further actions follow the procedure for circumstances indicating harm to the child.
- If employees from other hotel departments (e.g., housekeeping, room service, bar, restaurant, spa, security) witness unusual and/or suspicious situations, they should immediately inform their supervisor, who will determine the appropriate actions.

- Depending on the situation and location, the supervisor will assess the validity of the suspected harm to the child. The supervisor will then either take appropriate steps to clarify the situation or proceed with an intervention and notify the police if necessary.

### **Procedure in Case of Circumstances Indicating Child Harm**

- When there is a reasonable suspicion that a child staying at the hotel is being harmed, the police should be notified immediately by calling 112 and describing the incident circumstances. Depending on the urgency and situation, the call should be made by the direct witness of the event (employee/supervisor). If the person calling is an employee, they should simultaneously inform their supervisor.
- A reasonable suspicion of child harm arises when:
  - The child reveals to an employee that they are being harmed.
  - The employee observes harm occurring.
  - The child shows signs of harm (e.g., scratches, bruises), and when asked, responds inconsistently or chaotically, appears embarrassed, or other circumstances suggest possible harm (e.g., finding pornographic material involving children in the adult's room).
- In such cases, prevent the child and the suspected adult from leaving the premises.
- In justified cases, a **citizen's arrest** may be performed on the suspected individual. In this case, the person should be held in a separate room, out of sight of other guests, and under the supervision of two employees until the police arrive.
- Ensure the child's safety in all circumstances. The child should remain in the care of an employee until the police arrive.
- If there is reasonable suspicion that a crime involving physical contact with the perpetrator's biological material (e.g., semen, saliva, skin cells) has occurred, the child should be prevented from washing or consuming food/drinks until the police arrive.
- Once the child has been taken by the police, secure any relevant materials, including surveillance footage and other evidence (e.g., documents) related to the incident, and submit them to law enforcement or the prosecutor upon request by registered mail or in person.
- After the intervention, document the incident in an incident log or another designated record.

### **Employment of Individuals Working with Children**

- All individuals working with children must be safe for them, which includes having a background free of past child harm.
- Any individual employed by HOME&TRAVEL S.C. for roles involving child education, recreation, or supervision must be checked against the **Sex Offender Registry**. This verification involves printing search results from the restricted-access registry and placing them in the personnel file of the verified individual. This check is repeated annually. The personal data required for the registry check is listed in Appendix 3.
- All employees working with children, including those with potential child contact, must provide a statement of no criminal record and no ongoing legal or disciplinary proceedings for offenses against children (Appendix 4).

### **Glossary**

- For the purpose of this document, the following terms are defined:

**Child:** Any person under the age of 18.

**Unrelated Adult:** Any individual over 18 who is not the child's parent or legal guardian.

**Child Harm:** Any crime committed against a child.

**Crime Against a Child:** Crimes that can be committed against both adults and children, as well as those specific to minors (e.g., sexual exploitation under Article 200 of the Criminal Code). Due to the private nature of hotels, where isolation can be easily achieved, crimes most likely to occur on hotel premises include those against sexual freedom and decency, such as rape (Article 197), sexual exploitation of incapacity or helplessness (Article

198), sexual exploitation due to dependency or critical situation (Article 199), sexual exploitation of a person under 15 years (Article 200), and grooming via remote communication (Article 200a).

**Employee Hired for Work with Children:** Any individual employed to carry out child-related duties, including those under civil contracts, interns, trainees, and volunteers, regardless of citizenship or age.

## • **Appendix 1: Examples of Situations that May Raise Suspicion of Child Harm**

**NOTE:** Certain indicators do not automatically imply exploitation. It is essential to remain vigilant and attentive to situations that may raise concerns. An unusual relationship between an adult and a child that does not appear relaxed or nurturing is also concerning.

### **Reception**

- Guest refuses to provide personal or child's information.
- Guest takes the child directly to the room, appearing to avoid staff contact.
- Guest claims not to have identification documents for themselves or the child and refuses to explain.
- Guest registers with a child and invites non-registered individuals to the room for brief periods.
- Guest pays in cash or with a prepaid card, pays daily, or has another person pay for the room.
- Guest rents a room by the hour or for an unusually long stay.
- Guest brings objects that may be used as gifts for the child.
- Guest with a child has no luggage or only a small bag.
- Guest arrives with a child who was not previously registered.
- Guest behaves inappropriately toward the child, with a relationship that does not seem natural or nurturing.
- Guest with a child rents a room with fewer beds than guests, such as a double bed for one adult.
- The child is dressed inappropriately for the weather or relative to the adult.
- During registration, the child appears anxious or reluctant to stay with the adult.
- Children selling items or begging outside the hotel.
- The child arrives at the hotel late at night or during school hours.
- The child seems unaware of their location or gives inconsistent answers when asked about the trip.

### **Restaurant and Bar**

- Guest brings a child to the restaurant or bar who was not registered at the hotel.
- Non-registered individuals appear to approach guests, potentially offering contacts for minors.
- Guest inquires about adult services involving young people.
- Teenagers wait at a table or bar for an adult who does not seem to be a parent or guardian.
- Unattended children ask for food, drinks, or money.
- Exchange of cash between an adult and a child, potentially indicating payment for services.
- Children appear nervous, avoiding eye contact.
- The child lacks identification and appears under adult control.
- The adult behaves in a sexually suggestive manner toward the child.
- The adult provides the child with alcohol.
- The adult and child do not attend breakfast together.

### **Housekeeping**

- "Do Not Disturb" sign is consistently displayed on the door of a room occupied by children.
- Room cleaning is refused throughout the guest's stay.
- Large amounts of cash are seen in the room.
- Children are left alone in the room for extended periods or have food delivered.
- Numerous electronic devices are seen in the room (e.g., computers, phones, card readers).
- The adult and child rarely leave the room or only during hours when few guests are around.

- Children's clothing or toys are found in a room not registered with a child.
- Non-registered adults linger in the lobby, observing the area and contacting the guest with the child.
- Large amounts of alcohol or drugs are found in the room.
- The room contains condoms or similar items, despite being registered with a child.

## **Appendix 2: Sample Conversation Guide for Identifying Adults and Children**

- During a conversation with an adult, maintain calmness, be polite, and patient. Begin by explaining that the [hotel/hotel chain] follows child protection procedures, and as part of these, staff may ask additional questions to verify the child's details.
- Example questions for the adult:
  - "Our hotel has child protection procedures, so at check-in, we ask for the identification of all hotel guests. Does the child have an ID card or other identification (passport, school ID)?"
  - If the child has no identification, or if doubts remain after reviewing the ID, additional questions may help clarify the situation:
    - "What is the child's name and age?"
    - "Are you the child's legal guardian, or are you related?"
    - "Do you have a statement from the child's guardians authorizing you to be responsible for them?"
    - "Do you have a contact number for the child's guardians so we can verify this?"
    - "What is the purpose of your trip with the child?"
- Sample questions for the child:
  - "What is your name and age? Where do you live?"
  - "Who is the person you are with?"
  - "Do you know this person well?"
  - "Where are your parents? Would you like us to contact them – do you have their phone number?"
- If the adult is responsible for the child, inform them of your intent to speak with the child. If the adult hinders this, emphasize that inability to confirm the child's identity may require police involvement.