Standards for the protection of Minors in hotels owned or managed by Hotele DeSilva Sp. z o.o.

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Preamble

Considering the legal obligation arising from the provisions of the Act of May 13, 2016, on Counteracting the Threats of Sexual Crimes and the Protection of Minors, as well as the guidelines of the United Nations on business and human rights, and recognizing the essential role of business in ensuring the respect of
children's rights, DeSilva Group adopts the Standards for the Protection of Minors (also referred to as the «SOM» or «Standards»). This document constitutes a set of principles and procedures to be applied in cases where there is a suspicion that a child staying at DeSilva Group hotels may be harmed, and to prevent such threats, taking into account the situation of children with disabilities and children with special educational needs.
The SOM is implemented based on the following principles:

1. The DeSilva Group conducts its operations with respect for the rights of children, recognizing them as particularly vulnerable to harm.
2. The DeSilva Group acknowledges its role in conducting socially responsible business and promoting positive social behaviors.
3. The DeSilva Group emphasizes the legal and social obligation to report any suspected crime against children to the relevant authorities and commits to training its employees in this regard.

Glossary:

1.Child/Minor - For the purposes of these standards, a child is defined as any individual under the age of 18
2.Child's Guardian - The legal representative of the child, which may include a parent or guardian; a foster parent; or a temporary guardian (i.e., a person authorized to represent a minor Ukrainian citizen who is residing in the territory of the Republic of Poland without adult supervision) .
3.Foreign Adult - any individual over the age of 18 who is not a parent or legal guardian of the child.
4.Child abuse - understood as behavior that may constitute the commission of an unlawful act detrimental to a child by any individual or poses a threat to the child's well-being, including neglect. This encompasses any deliberate or inadvertent actions or omissions by individuals, institutions, or society as a whole, as well as any resulting consequences that infringe upon the rights, freedoms, and personal welfare of children and/or disrupt their optimal development.

1 According to Polish law, a child is defined as any person under the age of eighteen (Article 1 of the Convention on the Rights of the Child, adopted by the United Nations General Assembly on November 20, 1989). A minor is a person who has not reached the age of majority, meaning a person under eighteen years old, or a woman who has attained majority by marrying after the age of sixteen (Article 10 §§ 1 and 2 of the Civil Code), which may occur with the consent of the guardianship court for important reasons and if it is evident from the circumstances that the marriage would be in the best interests 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; foster parent - Article 1121 of the Family and Guardianship Code; temporary guardian - Article 25 of the Act on Assistance to Ukrainian Citizens in Connection with the Armed Conflict on the Territory of Ukraine.

5.Forms of abuse towards a child:

-Physical abuse of a child refers to violence that results in actual physical harm to the child or poses a potential risk of such harm. This harm occurs as a result of actions or omissions by a parent, another person responsible for the child, or someone whom the child trusts or has authority over the child. Physical abuse can be either a recurring act or a one-time event.
-Psychological abuse of a child involves prolonged, non-physical harmful interactions between the child and the caregiver, including both actions and omissions. This includes, but is not limited to: emotional unavailability, emotional neglect, hostile relationships, blaming, defaming, rejection, developmentally inappropriate or inconsistent interactions, failing to recognize or acknowledge the child's individuality and the psychological boundaries between the parent and the child.
-Sexual abuse of a child involves engaging the child in sexual activities that they are unable to fully understand, give informed consent to, and/or are developmentally immature to consent to in a legally valid manner, and/or that are inconsistent with legal or societal norms. Sexual abuse occurs when such activities involve a child and an adult or between children if they are in a care, dependency, or power relationship due to their age or developmental stage. Sexual abuse can also include sexual exploitation, which is any actual or attempted abuse of a position of vulnerability, power, or trust for sexual purposes, including but not limited to financial, social, or political gain from exploiting another person. There is a heightened risk of sexual exploitation during humanitarian crises. The risk of exploitation exists for both children and their caregivers.
-Neglect of a child refers to the chronic or incidental failure to meet the child's basic physical and emotional needs and/or to respect their fundamental rights, resulting in disruptions to their health and/or developmental difficulties. Neglect occurs in the context of the child's relationship with a person who is responsible for the child's care, upbringing, welfare, and protection.

6. Crimes Against Children – All crimes that can be committed against adults, as well as crimes that can be committed exclusively against children (e.g., sexual exploitation under Article 200 of the Penal Code). Due to the nature of accommodation facilities, where isolation can easily be achieved, the crimes most likely to occur on their premises include offenses against sexual freedom and decency, specifically rape (Article 197 of the Penal Code), sexual exploitation of incapacity and helplessness (Article 198 of the Penal Code), sexual exploitation of dependency or critical circumstances (Article 199 of the Penal Code).

7.Other Forms of Child Harm Beyond Criminal Offenses – All forms of violence against a child that do not meet the criteria for a crime prosecuted ex officio (e.g., shouting, humiliation, shaking, name-calling, neglecting needs, etc.).
8.Employee – A person employed under an employment contract or providing work under a similar agreement (e.g., a contract of mandate, B2B, contract for specific work), as well as an intern, trainee, volunteer, etc.
9.Employee Working with Children – Any person performing tasks or delegated to perform tasks related to the upbringing, education, recreation, treatment, psychological counseling, spiritual development, sports activities, or other interests of minors, or caring for them.
10.Entrepreneur – The entity/person/organization managing a given hotel or hotel chain, responsible for the proper formal functioning of the hotel.

CHAPTER I. HOTEL EMPLOYEES

General Principles

1. The DeSilva Group commits to educating its employees about the indicators that a child staying at the hotel may be abused, as well as the methods for responding quickly and appropriately to such situations. This education may be provided through various training formats, such as external training, internal training,
e-learning, self-developed educational materials, or materials developed by external organizations.

1. Each employee, before being permitted to work, is introduced to the SOM (Standard Operating Manual), which they acknowledge by signing a statement and committing to adhere to the principles and procedures outlined in this document. **See Attachment No. 1.**
2. Employees hired to work with children are required to undergo periodic training, which is documented by the employer .
3. The DeSilva Group is aware of the situation of children with disabilities and children with special educational needs, as described in **Attachment No. 12.** Therefore, when entering into agreements with institutions directing interns with disabilities or children with special educational needs to the hotel, it is a condition that the contract includes a requirement for a mandatory guardian assigned by the institution for the duration of the internship at the hotel.

[3]Periodic review of the SOM, and completion of the survey in accordance with Appendix No. 6

COMMENTS AND GUIDELINES:

- The hotel should provide SOM employees with access to training on recognizing signs of abuse and responding to child abuse.
- Many resources on this topic are produced by non-governmental organizations, including the Foundation «Dajemy Dzieciom Siłę» (also referred to as «FDDS» or «the Foundation»). To access these materials, one simply needs to create an account on the Foundation' seducational platform and make use of the free educational resources available at: https://edukacja.fdds.pl/.
- For employee education in this area, a designated person for the entire DeSilva Group is responsible for managing the training process and policies, providing access to educational content, and overseeing the frequency and documentation of training sessions (SOM Coordinator, whose responsibilities are described below).
- Guidelines concerning the specific needs and situations of children with disabilities and special educational needs are outlined in **Appendix No. 12.**

Employment of individuals for work with children

1.Individuals working with children must demonstrate in their employment history that they have not harmed any child in the past.
2.Every person employed or assigned to work with children must be checked in the National Register of Sexual Offenders (the Register). This requirement also applies to minor employees, that is, those under 18 years of age. The verification is done by printing the search results from the Register with restricted access, which is then included in the personnel files of the person being checked. The scope of personal data required to verify a person in the Register is detailed in Appendix No. 3.
3.Additionally, each person employed or assigned to work with children must provide a certificate from the National Criminal Register concerning offenses specified in Chapters XIX and XXV of the Penal Code, Article 189a and Article 207 of the Penal Code, and the Act of July 29, 2005, on Counteracting Drug Addiction (Journal of Laws 2023, item 172, and 2022, item 2600) or equivalent prohibited acts defined by foreign legal regulations.
4.If the person employed or assigned holds a nationality other than Polish, they must also present a certificate from the criminal record register of their country of citizenship, obtained for the purposes of professional or volunteer activities involving contact with children, or a certificate from the criminal record register if the laws of that country do not provide for the issuance of such certificates for the aforementioned purposes.
5. From the person employed or assigned, a declaration must also be obtained regarding the country or countries of residence over the past 20 years, other than the Republic of Poland and the country of citizenship, under the penalty of criminal liability. **See Appendix No. 4.**
6.If the law of the country where the criminal record information is to be obtained does not provide for the issuance of such information or does not maintain a criminal record register, the person employed or assigned must provide a declaration of this fact under the penalty of criminal liability. **See Appendix No. 5.**
7.Along with declarations made under the penalty of criminal liability, the following statement must be included: "I am aware of the criminal liability for providing false information." This statement replaces the formal warning by the authority regarding criminal liability for submitting false information.
8.When using the services of external entities, the hotel should include a relevant clause in the contract with the entity to ensure the enforcement of appropriate standards for checking the entity's

employees regarding their safety with children. This clause will allow the hotel to monitor compliance with this obligation under the threat of immediate termination of the contract and contractual penalties or other sanctions related to non-compliance with the contract terms in this regard.

COMMENTS AND GUIDELINES:

- A catalog of positions has been prepared (Appendix No. 8) that require verification in the Register of Sex Offenders and the National Criminal Register. To this end, the definitions of education, recreation, and child care have been referenced, as they indicate positions where such certification is necessary.
- Tasks related to the education of minors – defined in detail in the Act of December 22, 2015, on the Integrated Qualification System – Article 2, items 2-3, definition of education (Journal of Laws 2016, item 64).
- Tasks related to the recreation of minors – defined in detail in the Act of September 7, 1991, on the Education System – Article 92a (Journal of Laws 1991, No. 95, item 425).
- Tasks related to child care - defined in detail in the Act of February 25, 1964 – Family and Guardianship Code – Article 146 (Journal of Laws 1964, No. 9, item 59).
- - This includes individuals employed for direct work with children during the organization of their leisure time or educational activities (e.g., special events on hotel premises, green schools – if a hotel employee is designated to conduct activities or care for children; a children's corner – if there is an employee supervising or caring
- for the children/organizing their time, etc.). This also includes employees who act as guardians for minor interns, trainees, and volunteers.
- In case of any doubts, the employer may always ask employees who do not directly work with children but may have indirect contact with them to sign voluntary declarations of non-criminality and include them in the employee files.
- It is good practice to verify employees working with children annually in the Register of Sex Offenders. This is because any individual can commit a sexual offense against a child at any time, meaning that a previously verified employee may not maintain a non-criminal status.
- Information from the National Criminal Register can be obtained by the individual to whom the information pertains (candidate/employee). The certificate can be obtained directly from the court or online. Detailed information can be checked at: https://www.gov.pl/web/gov/uzyskaj-zaswiadczenie-z-krajowego-rejestru-karnego. The certificate is paid for, with the cost to be covered by the employer.

Scope of competence and responsibility of individuals designated for implementing minor protection standards

1.The oversight of the application of the SOM is conducted by the Entrepreneur (the company/owner entity within the DeSilva Group).
2.The Entrepreneur appoints a SOM Coordinator (hereinafter referred to as the «**Coordinator**»).
3.The Coordinator is responsible for familiarizing employees with the content of the SOM and monitoring its application.

4.The Coordinator organizes and documents the process of educating employees on recognizing signs that a child staying at the hotel may be being harmed and on how to respond quickly and appropriately to such situations in accordance with established procedures.
5.The Coordinator documents each intervention or reported incident related to child harm at the hotel in a designated document (e.g., incident log or intervention register).
6.In the event of a reasonable suspicion that a crime has been committed, the Coordinator is responsible for securing evidence, including surveillance recordings, and providing them to the authorities upon request, either by registered mail or in person to the prosecutor or police.
7.The Coordinator is responsible for managing the procedure in cases where a child has been harmed by a hotel employee or another adult who is not directly employed by the hotel but is contracted through a third party.
8.The Coordinator is responsible for monitoring and updating the SOM and ensuring its availability to employees, guests, and other entities cooperating with the hotel.
9.The Coordinator's contact information, as described below, must be available to all hotel employees and guests, including children. This information should include how to contact the Coordinator (dedicated email address, phone number, and availability: days and working hours).

COMMENTS AND GUIDELINES:

Coordinator's Responsibilities:
- Reporting suspicions of criminal offenses against minors,
- Preparing employees for the application of SOM, including the guidelines for their preparation and the method of documenting this process.

Principles of safe employee-child relationships

1.All employees of DeSilva Group hotels, as well as other adults who have contact with children on hotel premises, provided that such contact is authorized by the hotel, are required to adhere to the following principles.
2.The primary principle governing all actions taken by employees who have contact with children on hotel premises is to treat the child with respect, taking into account their dignity and needs.
3.The use of any form of violence by employees and other adults towards a child is strictly prohibited.

A.Expected behaviors and practices for employees

Exercise patience and respect when communicating with the child.
-Listen attentively to the child and provide responses appropriate to their age and the situation. When communicating with the child, try to ensure your face is at their eye level.
-Assure the child that if they feel uncomfortable with any situation, they can speak to you or another designated person to receive help.
-Inform the child where the hotel's safety and emergency procedures (SOM) are located in a manner they can understand. Ensure they know that if they have questions, they can approach you or another assigned person.
-Adhere to equal treatment of children regardless of their gender, sexual orientation, ability/disability, social status, ethnicity, culture, religion, or worldview.
-Maintain a safe environment. If children are present in the area where you work, ensure that equipment and facilities are used as intended and that the surroundings are safe (pay attention to window and stair safety, restricted access to busy roads, open water, etc.).

-If you observe a child or children left unattended and the situation may indicate a safety risk, take action to locate the parent or guardian.

B.Unacceptable Conduct and Practices by Employees Toward Children

-You are prohibited from yelling at, embarrassing, humiliating, belittling, or insulting the child.
-You are prohibited from hitting, poking, pushing, or otherwise violating the child's physical integrity, except in cases where there is a threat to the child's health or life.
-You are prohibited from engaging in any romantic or sexual relationships with the child, or making inappropriate proposals. This also includes sexual comments, jokes, gestures, and sharing erotic or pornographic content with the child, regardless of its form.
-You are prohibited from capturing the child's image for private or professional purposes (e.g., recording, photographing) without the consent of the child's parents/guardians and the child's own consent. This also applies to allowing third parties to capture the child's image. An exception is when the child's image is merely a part of a larger whole, such as a crowd, landscape, or public event, in which case parental/guardian consent is not required.
-You are prohibited from contacting the child through private communication channels (e.g., personal phone, email, messaging apps, social media profiles) or meeting with the child outside of work.
-You are prohibited from offering the child alcohol, tobacco products, or illegal substances.
-You should never touch the child if they do not want it or in a manner that could be considered inappropriate or improper.

If you witness any of the behaviors or situations described above by other adults or children, you must always inform your supervisor and the SOM Coordinator.

CHAPTER II. PROCEDURE FOR CHILD IDENTIFICATION DURING REGISTRATION AT RECEPTION

1.One effective way to prevent harm to children is to verify the identity of a child staying at the hotel and their relationship with the adult accompanying them.
2.The reception staff shall take all possible steps to identify the child and their relationship with the accompanying adult.
3To identify the child and their relationship with the accompanying adult, the following steps should be taken:
a. Request a document confirming the child's identity or other documentation proving that the adult has the right to care for the child. Acceptable documents for identification include: identity card, school ID, MObywatel app, Patient Online Account, or a court order. If no identity document is available or if its presentation is refused, request the child's details (name, surname, address, PESEL number).
b. If there are no documents indicating the relationship between the child and the adult, or if the presentation of such documents is refused, ask both the adult and the child about their relationship. A sample dialogue with the adult and the child is provided in **Appendix 2.**
c. If the adult is not the child's parent or legal guardian, they should be asked to present a document, such as a notarized consent from the parent for the adult to travel with the child, or a consent signed by the child's parent that includes the child's details, residence address, parent's contact number, and the identity document number/PESEL number of the person to whom the parent has entrusted the child's care.

If an adult does not possess any of the aforementioned documents, they should be asked to complete a statement in accordance with the template (Attachment No. 13). The statement should include the child's details and the details of the adult with whom the child is staying, along with specifying the relationship between the child and the adult. If the adult is not the child's parent or legal guardian, they must declare that the child's parents/legal guardians have consented to the adult's care of the child.

4.In the event of an adult refusing to present the child's documentation and/or disclose the relationship with the child, it should be explained that the procedure is in place to ensure the safety of children and that, according to the provisions of the Act of May 13, 2016, on Counteracting Threats Related to Sexual Offenses and Protecting Minors, employees must comply with child protection regulations. After clarifying the matter positively, thank them for taking the time to ensure the child is under proper care.
5.If the conversation does not resolve doubts about the adult's intentions towards the child, especially if the adult refuses to show identification or the child does not have such a document, and the adult also refuses to provide a written statement, discreetly inform the supervisor and security personnel (if present on the premises) in a manner that does not raise suspicion (e.g., by requesting the adult and child to wait in the lobby, restaurant, or another location while referring to the need to use equipment in the back office).
6.From the moment any doubts arise, both the child and the adult should, if possible, remain within the employee's view and should not be left alone.
7.The supervisor notified of the situation will take over the conversation with the adult to obtain further clarification.
8.If the conversation confirms suspicions of an attempt or commission of a crime against the child, the supervisor will notify the police. The procedure then follows as outlined for circumstances indicating harm to a child (see Section III).
9.If employees from other departments, such as cleaning service, room service, bar and restaurant staff, relaxation area staff, security, etc., witness unusual and/
or suspicious situations, 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 location, the supervisor will assess whether the suspicion of child harm is justified. To this end, they will select appropriate measures to clarify the situation or decide to conduct an intervention and notify the police.

COMMENTS/INSTRUCTIONS:

- To avoid situations where an adult is unprepared to present the child's documents
- (such as a lack of identification, school ID, or other documents enabling this
- identification), information about this requirement has been placed on the DeSilva
- Group's website.
- - Adults traveling with children should be informed that, during registration, a
- document verifying the child's identity will be required. This document should
- indicate the relationship between the child and the accompanying adult and may
- include a personal identification card, school ID, MOBYWATEL, Internet Patient
- Account, civil status certificate, court ruling, a notarized consent from the parent
- for the individual traveling with the child, or a consent signed by the child's parent,
- including the child's details, residence address, contact phone number for the parent,
- and the ID number/PESEL number of the person entrusted with the child's care. If the

- adult does not possess such documents, the minimal action by the employee will be
- to conduct a careful conversation with both the child and the adult.

CHAPTER III.
PROCEDURE IN CASES INDICATING HARM TO A CHILD BY AN ADULT

1.Reasonable suspicion of child abuse arises when:
a. the child has disclosed to the employee that they are being harmed,
b. the employee has observed signs of harm,
c. the child shows signs of harm (e.g., scratches, bruises), and when questioned, responds inconsistently and/or chaotically or shows signs of embarrassment, or other circumstances indicate harm, such as the discovery of pornographic material involving children in an adult's room.
2. An employee who has reasonable suspicion that a child staying at the hotel is or has been harmed should immediately notify their supervisor or the decisionmaker, who will then contact the police. In cases where there is a risk to the child's safety, the employee with reasonable suspicion of harm should promptly inform their supervisor, detailing the circumstances of the incident. The supervisor will decide on further actions, including whether to call the police (emergency numer 112) and notify the Coordinator of the incident.
3.. Efforts should be made to prevent or even inhibit the child and the person suspected of harming the child from leaving the hotel.
4. In every case, the child's safety must be ensured. The child, if possible, should remain under the supervision of an employee until the police arrive. If feasible, attempts should be made to support the child. See **Appendix No. 10.**
5. In the case of reasonable suspicion that a crime involving contact between the child and the perpetrator's biological material (e.g., semen, saliva, skin cells) has occurred, efforts should be made to prevent the child from washing or eating/drinking until the police arrive. The child should be informed of the reasons for these restrictions.
6. After the police take over the child, the monitoring footage and other relevant evidence (e.g., documents) related to the incident should be preserved and provided to the Coordinator. The Coordinator will, upon request from the authorities, send a copy of the evidence by registered mail or deliver it in person to the prosecutor or police.
7. Following the intervention, the incident should be reported to the Coordinator, who will record it in the incident log or another designated document.

CHAPTER IV.
PROCEDURE IN THE EVENT OF SUSPECTED OR CONFIRMED CHILD ABUSE BY AN EMPLOYEE OR OTHER ADULT

1.In the event that child abuse by a parent/legal guardian or another adult with whom the child is staying at the hotel is detected, any employee who witnesses such abuse must respond firmly.
2.If the child's life or health is at risk, the person who receives this information should immediately notify the police by calling emergency number 112, providing their own details, the child's details (if possible), the child's location, and a description of the circumstances of the case, and inform their superior/decision-maker. The person who receives the information about the incident should also inform the Coordinator, at least in writing or via email.
3.If an employee has inflicted harm on a child in a manner other than committing a criminal offense against the child, the Coordinator, upon receiving information, should investigate all the circumstances of the case, particularly by hearing from the suspected employee and other witnesses. If the violation of the child's rights is significant, especially if it involves discrimination or an

infringement of the child's dignity, the Coordinator should recommend appropriate personnel actions concerning the employee.
4.If the person who committed the harm is not directly employed by the hotel but by a third party (e.g., outsourcing), then a recommendation should be made to prohibit their entry to the hotel premises and, if necessary, terminate the contract with the third party.

COMMENTS/INSTRUCTIONS:

- If possible, the employee reporting the harm should be guaranteed anonymity to prevent fear of negative consequences from the employee suspected of causing the harm. This is a common reason for not reporting suspicions of child abuse by an adult.
- Anonymity of the report may be unfeasible if a crime has occurred and relevant authorities need to verify details of the incident, including by interviewing witnesses. The reporting individual should be informed of this possibility.

CHAPTER V.
PROCEDURE IN THE CASE OF IDENTIFYING OTHER FORMS OF VIOLENCEAGAINST A CHILD BY A PARENT/LEGAL GUARDIAN OR ANOTHER ADULT

1. In the event that child abuse by a parent/legal guardian or another adult with whom the child is staying at the hotel is detected, any employee who witnesses such abuse must respond firmly.
2. If the child's life or health is at risk, the person who receives this information should immediately notify the police by calling emergency number 112, providing their own details, the child's details (if possible), the child's location, and a description of the circumstances of the case, and inform their superior/decision-maker. The person who receives the information about the incident should also inform the Coordinator, at least in writing or via email
3. If an employee witnesses physical violence against the child (e.g., spanking, shaking, shouting, or other actions defined as physical violence), they should attempt to stop the abuse and react accordingly. Possible forms and methods of responding to abusive behavior by a parent/guardian/other adult towards the child can be found in Annex 11.
4. In the case of a child under the age of 7 being left unattended, the employee who becomes aware of this situation should notify their superior. The superior, upon being informed, will make a decision on further action, considering the circumstances and the context of the Criminal Code and the Misdemeanor Code. Depending on the situation, the superior will attempt to locate the parent/legal guardian or another adult with whom the child is staying at the hotel and explain that they cannot leave the child unattended. If it is not possible to locate the parent/legal guardian or another adult with whom the child is staying, or if the parent/legal guardian/other adult is unwilling or unable to take over the care of the child, the superior will notify the police. In all cases, the child's safety must be e.nsured

CHAPTER VI:
MONITORING AND EVALUATION OF THE SOM

1.The Entrepreneur appoints a Coordinator responsible for the SOM (Standard Operating Manual) within the DeSilva Group and provides their contact information in a location easily accessible to employees and hotel guests, including children.

2.The Entrepreneur defines the Coordinator's scope of duties and competencies regarding employee preparation for adhering to the SOM, including the principles of preparing employees for its application and the method for documenting these activities.

3.The Coordinator conducts monitoring and evaluation of the SOM every two years.

4.Monitoring and evaluation include verifying the implementation of the SOM, responding to indications of violations of principles and procedures, and suggesting amendments to the document, particularly in terms of adapting it to current needs and ensuring compliance with applicable regulations.

5.The Coordinator conducts a survey among employees every two years to monitor the implementation of the SOM. A sample survey is provided in **Appendix No. 6.**

6.In the survey, employees can suggest changes and report violations of the SOM principles and procedures.

7.The Coordinator prepares a report based on the completed employee surveys and then submits this report to the Entrepreneur. The Entrepreneur makes necessary amendments to the document and announces the updated SOM to the employees.

COMMENTS/INSTRUCTIONS:

- Defining the scope of responsibilities for the person in charge of preparing employees for the use of SOM, the principles for preparing employees for its application, and the method of documenting this process is a statutory obligation.
- - It is good practice to monitor and evaluate the SOM annually (as required by law, every 2 years) or whenever there are changes to the relevant regulations. This approach allows for timely responses to dynamic changes in legal requirements and facilitates quicker identification of necessary updates to the SOM, such as modifications to procedures or principles that may not be functioning correctly or are not being adhered to by employees, necessitating prompt action and appropriate measures.

Final Provisions

1.The Child Protection Standards shall come into effect on August 15, 2024.
2. The Child Protection Standards are made available to all employees by posting them on the DeSilva Group's website and in the DeSilva Group Manual at the headquarters of Hotele De Silva Sp. z o.o.
3. The Child Protection Standards are provided to guests by posting them on the DeSilva Group's website and in the DeSilva Group Manual at the headquarters of Hotele De Silva Sp. z o.o.
4. The Child Protection Standards are provided in a comprehensible and simplified version for children staying at DeSilva Group hotels, in a location accessible to them **(Attachment No. 15).**

COMMENTS/INSTRUCTIONS:

1.Preparation of the abbreviated version of the SOM should focus on:
-Selecting an appropriate language that is understandable for different age groups.
-Choosing a graphic format that is more accessible for children, especially younger ones.
-The content of the shortened SOM should focus on indicating that all hotel staff treat children with respect and dignity, and do not tolerate any forms of abuse.

-It is advisable to include information on what constitutes abuse, listing all its forms (as sometimes children may not realize they are being abused).
-Outlining what a child can do and whom they can contact when they feel threatened or concerned.
-Additionally, it is useful to indicate the desirable and prohibited behaviors of adult staff towards children.
-It is beneficial for the shortened version to be translated into a language other than Polish.

2. Principles of Safe Relationships Between Children:

If the hotel organizes activities for children or if the nature of the hotel's operations results in groups of children staying together for extended periods or meeting regularly, and if the children interact within a community and develop relationships, the hotel should create an appendix to the SOM titled «Guidelines for Safe Interactions Among Children.» In hotels where children's contact is occasional and short-term, the implementation of such guidelines is not required.

The content of the «Guidelines for Safe Interactions Among Children» should be developed collaboratively, involving children and taking into account the specifics of the hotel as well as the needs of the children staying there. In cases where children of various age groups and needs are present, separate versions of the guidelines can be created for different groups.

The «Guidelines for Safe Interactions Among Children» should include the following topics
1. Communication rules (including online communication)
2. Prohibition of any form of violence
3. Conflict resolution methods
4. Respect for others' property, privacy, and personal space
5. Equal treatment, respect for diversity, individual identity, and expression

List of Attachments:

- ✓ **Attachment 1:** Statement of Familiarity with the SOM (Safeguarding of Minors). **Attachment 2:** Sample Conversation Guide for Interaction with Adults and Children During Identification.
- ✓ **Attachment 3**: Scope of Data for Verifying Individuals in the Sexual Offenders Register.
- ✓ **Attachment 4:** Template for Declaration of Country of Residence.
- ✓ **Attachment 5:** Template for Declaration of Criminal Record.
- ✓ **Attachment 6:** Survey for Monitoring the Implementation of SOM.
- ✓ **Attachment 7:** Examples of Situations That May Raise Suspicions or Indicate Child Abuse.
- ✓ **Attachment 8:** Sample List of Employee Positions in a Hotel Subject to Verification for Child Protection.
- ✓ **Attachment 9:** Template for Declaration Regarding the Application of SOM by Outsourcing Firms Employed by the Hotel.
- ✓ **Attachment 10:** Guidelines for Talking to Children Who Have Been Victims of Crime – Instructions for Employees.
- ✓ **Attachment 11:** Response Strategies for Addressing Harmful Behaviors of Parents/ Guardians/Other Adults Toward Children.
- ✓ **Attachment 12:** SOM Guidelines Addressing the Situation of Minors with Special Educational Needs, Including Disabilities.

- ✓ **Attachment 13:** Template for Adult Declaration Concerning Relations with a Minor. **Attachment 14:** Template for Statement for Organized Groups Provided by the Organizer.
- ✓ **Attachment 15:** Safeguarding Standards for Minors – Condensed Version for Children.

Attachment No. 1: Statement of familiarization with minor protection standards

Location, date ….....

I hereby declare that I have familiarized myself with the Child Protection Standards applicable at the hotel [……] and agree to adhere to them.

Date and signature (employee's full name)

Attachment No. 2: Sample conversation outline with an adult and child during identification

When speaking with an adult, it is important to remain calm, polite, and patient.
At the beginning of the conversation, it is advisable to inform the adult that the hotel enforces Minor Protection Standards, and, as such, it is the employee's duty to verify the identity of the child and the nature of the relationship between the child and the accompanying adult. This is also in accordance with the law on the protection of minors.
There may be situations where the adult feels uncomfortable, expresses opposition, or dissatisfaction. This does not necessarily mean they are a potential offender.

Example conversation with a guest:

«The hotel adheres to Child Protection Standards. Therefore, at the time of registration, in accordance with the information provided on the website, we kindly request the presentation of identity documents for both the child and the accompanying adult. Does the child have an identity document with them?» (e.g., ID card, passport, or any other document that can confirm the child's identity).
If the child does not have an identity document, or after checking the document, there is uncertainty as to whether the adult is the child's legal guardian, we ask the adult the following questions to help assess the situation:
What is the child's name, and how old are they?
Are you the legal guardian of the child? Or, is the child related to you? Do you have a document authorizing you to care for the child?
Do you have a statement from the child's parents confirming that the child is under your care?
Can you or the child call the parents/guardians so that we can verify this?
May I know the purpose of your and the child's trip?

Sample conversation with a child:

Welcome to our hotel.
My name is ……, and I am responsible for …….. I would like to ask you a few questions:
What is your name, and how old are you? Where do you live?
Who is the person you came with/are staying with/traveling with?
Do you know this man/woman well?
Where are your parents? We would like to contact them; do you have their phone number?

If an adult is responsible for a child, we inform them that we wish to speak directly with the child.
In any situation where we are unable to verify the identity of the child or the relationship between the child and the accompanying adult, we request the adult to complete the declaration referenced in Chapter II, Section 3, Subsection c.
If the adult obstructs contact with the child, refuses to provide the child's details, or refuses to complete the declaration, they should be offered a conversation with a supervisor.
If the adult wishes to cancel the accommodation service due to the required procedures and leave the hotel with the child, the staff member should attempt to de-escalate the situation and offer to register the adult and child without the need for a declaration or providing details. Simultaneously, after completing the registration process and once the adult has gone to their room, the staff member must report the situation to a supervisor, as there may be a risk of harm to the child within the hotel premises. The supervisor will then decide on further actions: observing the adult or contacting the police, who may verify the identity of the adult and child.

Attachment No. 3. Scope of data for checking a person in the sex offender registry
Scope of employee data required for verification in the Sex Offender Registry.

Full Name: …….....
Date of Birth: …….....
PESEL: …….....
Maiden Name: ……..
Father's Name: …….
Mother's Name: ……

The registry is available at: https://rps.ms.gov.pl/
To access information from the restricted access register, it is necessary to create an organization profile.

I hereby acknowledge that I have read the information regarding the processing of my personal data by Hotele De Silva sp. z o.o. and understand its content (the information clause is located on the reverse side of this page).

…….
(date, employee signature

Information clause on the processing of the above personal data:

Hotele De Silva Sp. z o.o., in accordance with Article 13(1) and (2) of the GDPR, regarding the collection of your personal data as required by specific legal obligations, hereby informs you that:
1.The controller of your personal data is Hotele De Silva Sp. z o.o., with its registered office at 45B Puławska Street, Piaseczno (05-500). You can contact the Controller through the HOTEL within the COMPANY's structure.
2.The Controller has appointed a Data Protection Officer, whom you can contact regarding the protection of your personal data via email at iod@desilva.pl. You may reach the Data Protection Officer for all matters concerning the processing of your personal data by Hotele De Silva Sp. z o.o. and the exercise of rights related to this data processing.
3.Your personal data will be processed for the purpose of verifying your status in the Register of Sex Offenders and based on a certificate from the National Criminal Register before you are allowed to work or engage in activities related to the upbringing, education, recreation, or treatment of minors, or in connection with their care within activities conducted by the Controller to fulfill legal obligations.
4.The legal basis for obtaining your personal data is Article 6(1)(c) of the GDPR – a legal obligation imposed on the Controller in connection with Article 21 of the Act of May 13, 2016, on Counteracting Threats to Sexual Crime and Protecting Minors, and the Regulations issued under the Act by the Minister of Justice dated July 31, 2017, and May 20, 2020, specifying the types of data required for verification in the register related to Chapters 19 and 25 of the Penal Code, and Article 189a and Article 207 of the Penal Code, as well as the Act of July 29, 2005, on Counteracting Drug Addiction.
5.Providing data is a statutory (mandatory) requirement; however, failure to provide the data and/or a negative result from one of the registers (RSPTS or KRK) after verification by the Controller will result in the refusal to engage in cooperation with you.
6.The recipients of your personal data will be the Ministry of Justice.
7.Information obtained from the registers will be stored in the employee/associate's personel
8.Personal data will not be subject to profiling or automated decision-making.
9.Under the GDPR, you have the right to: a) access the content of your personal data, b) correct inaccurate data, c) delete data if there are grounds to believe that it is being processed unlawfully or is no longer necessary for the purposes defined by the Controller, d) restrict the processing of your personal data. To exercise these rights, you must send a request and contact the details provided in points 1 or 2 of this clause.
10.If you believe that the processing of your personal data in a manner justified violates the provisions of the General Data Protection Regulation (GDPR), you have the right to file a complaint with the supervisory authority, i.e., the Personal Data Protection Office, 2 Stawki Street, 00-193 Warsaw, email: kancelaria@uodo.gov.pl, hotline: 606-950-000.
11.Personal data will not be transferred to third countries outside the European Economic Area or to international organizations.

Attachment No. 4: Sample declaration of countries of residence

……..……, on……. r.

DECLARATION OF COUNTRY OF RESIDENCE

I declare that over the last 20 years I have lived in the following countries, other than the Republic of Poland and the country of which I am a citizen:

…

….

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

I am aware of criminal liability for submitting a false statement.

Legible signature

……..……, on……. r.

DECLARATION OF COUNTRY OF RESIDENCE

I declare that over the last 20 years I have lived in the following countries, other than the Republic of Poland and the country of which I am a citizen:

…

….

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

I am aware of criminal liability for submitting a false statement.

Legible signature

Attachment No. 5. Sample declaration of no criminal record

Location and date

Declaration of no criminal record

I,.....PESEL number ..... /Passport number.....declare that in the country of …… there is no criminal record register / information from the criminal record register is not issued [delete as applicable]. I declare that I have not been lawfully convicted in the country of ..... for offenses equivalent to those specified in Chapters XIX and XXV of the Penal Code, Article 189a and Article 207 of the Penal Code, and the Act of July 29, 2005, on Counteracting Drug Addiction. I also declare 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, other authorized body, or law, prohibiting me from holding any or specific positions, performing any or specific professions, or engaging in activities related to the upbringing, education, recreation, treatment, psychological counseling, spiritual development, sports, or other interests of minors, or caring for them.

I am aware of the criminal liability for providing false information.

Legible Signature

place and date

Statement of no criminal record

I, ... PESEL number. ...../passport number .....

I declare that in the country of ……. no criminal record is kept / information from the criminal record is not issued [*delete as appropriate*]. I declare that I have not been legally convicted in the country of ..... for prohibited acts corresponding to the crimes specified in Chapter XIX and XXV of the Penal Code, in art. 189a and art. 207 of the Penal Code and the Act of July 29, 2005 on counteracting drug addiction, and no other judgment was issued against me stating that I had committed such prohibited acts and that no obligation resulting from the court judgment was imposed on me, other authorized body or act, compliance with the prohibition on holding any or specific positions, performing any or specific professions or activities related to upbringing, education, recreation, treatment, providing psychological advice, spiritual development, practicing sports or pursuing other interests by minors, or with their care.

I am aware of criminal liability for submitting a false statement.

Legible signature

Attachment No. 6. Monitoring survey for SOM implementation level.

Question	YES	NO	NOTES
1. Are you familiar with the contents of the Minor Protection Standards document?			
2. Do you know what situations might indicate that a child is at risk of being harmed?			
3. Are you aware of the procedures for responding to suspicions or findings of child abuse within the hotel premises?			
4. Have you ever observed a violation of the rules outlined in the Minor Protection Standards?			
a) If so, which rules were violated? (Descriptive answer)			
b) Did you take any actions: if yes, what were they; if no, why not? (Descriptive answer)			
5. Do you have any suggestions for changes to the Minor Protection Standards? (Descriptive answer)			

Attachment No. 7. Examples of situations that may raise suspicion or indicate child abuse

NOTICE! The occurrence of certain events does not automatically indicate that a minor is being harmed. It is important to remain vigilant and pay attention to situations that raise concern.
A situation that is also alarming is one where the relationship between an adult and a child does not appear to be free and nurturing.

RECEPTION

The guest does not wish to provide their personal information or the child's details.	The guest takes the child directly to the room, giving the impression that they do not want the child to make contact with the person working at the reception.
The guest states that they do not have their own or the child's documents and does not wish to provide any explanations.	The guest checking in with the child invites other people who are not hotel guests (such people may appear for a short period).
The guest, along with the child, pays in cash or with a prepaid card. They pay daily (unsure of the length of stay) or asks someone else to pay for their stay.	The guest with the child rents the room by the hour or not for the entire day, or rents the room for a very long period.
The guest has with them gadgets or items that may be given to children as gifts.	The guest arriving with the child has no luggage or arrives with very little luggage (e.g., a carry-on bag or briefcase).
The guest arrives at the hotel with a child who was not previously registered at the reception.	The guest behaves in a sexually suggestive manner towards the child, and the relationship between the adult and the child does not seem natural and caring.
The guest, who is not the child's parent, rents a room with fewer beds than the number of registered guests – e.g., a double bed.	The child is dressed inappropriately for the weather or in a manner that is inconsistent with the adult they came to the hotel with.
During registration, the child appears anxious, stressed, or coerced into staying at the hotel with an adult.	Children selling small items or begging outside the hotel.
The child arrives at the hotel late at night or at a time when they should be in school.	The child does not know where they are or provides inconsistent answers when asked about the purpose of their travel.
The adult registering with the child does not allow the hotel staff to have direct contact with the child – they are responsible for the child and do not allow the child to speak.	The child appears to be under the influence of drugs or alcohol (e.g., impaired and erratic vision, difficulty maintaining balance, slurred speech, lack of response to stimuli).

RESTAURANT AND BAR

The guest arrives at the bar or restaurant with a child who was not registered at the hotel.	External individuals not registered at the hotel seem to be looking for guests and offering them something (possibly intending to mediate in providing contact information for children).
The guest inquires about adult sexual services, including those involving young individuals	Teenagers wait at the table or in the bar for an adult to pick them up, who does not appear to

(e.g., overheard conversations in the bar or restaurant).	be their parent or guardian (it is possible that this person is a pimp or human trafficker).
Children who appear to be unattended are asking for food, drinks, or money.	Cash exchanges between an adult and a child (such exchanges might raise suspicion of payment for services).
Children seem anxious, agitated, and avoid eye contact.	During their stay, the adult and child do not come to the breakfast room.
An adult is behaving in a sexually suggestive manner towards the child – this is not a natural or caregiving relationship.	The adult provides alcohol to the child.

FLOOR SERVICE

A «Do Not Disturb» sign continuously visible on the door of the room where children are staying.	Lack of consent for room cleaning throughout the guest's stay.
A large amount of cash or banknotes observed in the room (which may indicate illegal payments).	Children left unattended for extended periods in the room or who do not leave the room at all (e.g., food is brought to them).
A significant number of computers, mobile phones, and card readers observed in the room.	An adult and children rarely leave the room, almost never leave, or only leave during times when there are few guests moving around the hotel.
Children's clothing or toys found in the room despite the child not being registered at the hotel.	Non-hotel guests, who are adults, stay in the lobby, seem to be observing the surroundings, and interact with the hotel guest who arrived with a child.
A large quantity of alcohol or drugs found in the room where an adult registered with a child.	In the room where an adult has registered only with a child or children, there are condoms, drugs, or other pornographic materials left in plain sight

Attachment No. 8: List of hotel employee positions subject to child protection verification.

Job Categories:

1. The employee who WORKS DIRECTLY with children, such as leading activities and providing care for minors in the hotel, is required to undergo verification in the Register of Sexual Offenders and must present a certificate from the National Criminal Register (KRK) in Poland and from other relevant countries, if applicable.
2. The employee who has INDIRECT contact with minors in the hotel is not required to undergo verification. However, it is recommended that the employee voluntarily provide a declaration of no criminal record for sexual offenses as listed in KRK.

JOB DESCRIPTION	CATEGORY	SCOPE	NOTES
Employee performing tasks related to child care and leisure organization at the hotel	**DIRECTLY**	MINOR - GUEST	Obtain a statement from the business owner (as per Attachment No. 9).
lifeguard	**DIRECTLY**	MINOR - GUEST	Responsibility for supervising the swimming pool.
Internship Supervisor	**DIRECTLY**	MINOR - INTERN	Assume responsibility for the intern.
Reception Staff	INDIRECTLY	MINOR - GUEST/INTERN	Only in the case of providing information to a minor, e.g., if a child has strayed from their parent/guardian (lost).
Technical and Maintenance Staff	INDIRECTLY	MINOR - GUEST/INTERN	In the event of resolving a malfunction in a guest room during their stay (the child may be in the room, but must always be accompanied by a parent/ guardian).
Housekeeping Staff	INDIRECTLY	MINOR - GUEST/INTERN	During service maintenance in a guest room during their stay (the child may be in the room, but must always be accompanied by a parent/ guardian).
Kitchen Staff	INDIRECTLY	MINOR - GUEST/INTERN	During the serving of meals in the restaurant (the minor must be under the supervision of a parent/ guardian).
JOB DESCRIPTION	CATEGORY	SCOPE	NOTES
Employee performing tasks related to child care and leisure organization at the hotel	**DIRECTLY**	MINOR - GUEST	Obtain a statement from the business owner (as per Attachment No. 9).

lifeguard	**DIRECTLY**	MINOR - GUEST	Responsibility for supervising the swimming pool.
Internship Supervisor	**DIRECTLY**	MINOR - INTERN	Assume responsibility for the intern.
Security	INDIRECTLY	MINOR - GUEST/INTERN	In urgent situations requiring security intervention

Attachment 9: Sample declaration on the application of SOM for outsourcing companies employed by the hotel

Location and date

Company information (name, address, NIP number)

DECLARATION

I hereby declare that*:

-Employees and collaborators employed by …… (company name) for working with children have been verified for criminal records in the National Register of Sex Offenders and have provided the requ
ired certificate from the National Criminal Register in Poland and from other countries (if applicable). Upon request by……..……1, I agree to make these documents available for review.

-Employees and collaborators providing services on the hotel premises have been acquainted with and will comply with the Child Protection Standards in effect at the hotel.

-(Company Name) has implemented its own Child Protection Standards, which apply within the company.

Signature(s) in accordance with

** Please indicate the points that pertain to the scope of cooperation.*

[8]Appropriate description in accordance with the contract between the DeSilva Group and the given contractor (e.g. principal, ordering party, etc.)

Attachment No. 10: Guidelines for communicating with a child who has been a victim of a crime – instructions for employees.

If an intervention is required in the hotel to protect the health or life of a child, or if the child discloses abuse, the primary concern must be the child's safety. Until the arrival of the police or other emergency services, the child should be under the care of a staff member.

Such a situation may cause significant stress for the child and lead to various reactions, such as:
-Agitation and panic,
-Escape behaviors aimed at diverting attention from the difficult situation, such as trivializing the situation, laughter, or other behaviors that may seem inappropriate,
-Aggression, self-harm, and regressive behaviors (e.g., rocking, clenching fists),
-A sense of confusion or disorientation,
-Withdrawal, being quiet, minimal movement, or lack of movement.

Every interaction with a child who has been harmed requires sensitivity and empathy.

A child who has suffered significant harm at the hands of adults is likely to be very distrustful. For a long time, they may have experienced a strong sense of life- threatening danger, feeling as though they have no control over their fate, and may feel helpless and frightened.
A child who has been sexually abused often believes that other adults will not believe their account and fears being blamed and seen as a «bad» person.
Additionally, the child may feel a degree of responsibility for being abused, leading to a profound sense of guilt.

Due to the manipulations of the perpetrator, the child perceives them as having exceptional influence, making the child feel that no one can protect them from the perpetrator. Perpetrators sometimes threaten the child, warning that if they testify against them, something «bad» may happen to the child or their loved ones. Perpetrators frequently involve the child in a conspiracy of silence, using arguments that instill guilt in the child, convincing them that they are partially responsible for what happened or that if they reveal the abuse, no one will believe them, and the perpetrator will avoid punishment.

A child victim of trafficking often witnesses violence and crimes, and frequently finds themselves coerced into committing such acts. The perpetrator exploits this by threatening the child with punishment from law enforcement. Consequently, the terrified child defends and justifies the perpetrator. In extreme cases of life- threatening danger, the victim may develop Stockholm Syndrome [9]. This syndrome results from psychological responses to intense stress, which can lead the child to cooperate with the perpetrator or even view them as a caretaker.

[9]Stockholm Syndrome – a psychological state that occurs in victims of kidnapping or hostage situations, characterized by feelings of affection and solidarity towards their captors. This syndrome can reach a point where the captives assist their oppressors in achieving their goals or escaping from the police.

GENERAL GUIDELINES FOR COMMUNICATING WITH YOUNGER CHILDREN:

Get on the Child's Level: Try to be at the child's eye level (sit opposite them, kneel, etc.).
Address the Child by Name: If possible, use the child's name when speaking to them.
Speak Slowly and Calmly: Use a clear and gentle tone.
Use Simple Language: Employ straightforward and easy-to-understand words.
Maintain Eye Contact: Keep a steady connection with the child's eyes.
Check for Understanding: Observe whether the child comprehends you.
Use the Child's Vocabulary: Frame questions using words and terms familiar to the child

GUIDELINES FOR CONDUCTING A CONVERSATION WITH A CHILD VICTIM:

Introduce yourself before approaching the child.
Acknowledge and accept the child's reactions and feelings. Pay attention to non- verbal signs of the child's emotions—embarrassment, discomfort, shame, fear, terror, sadness, guilt.
Respond to these feelings by helping the child cope: «I see that you're feeling uncomfortable; it's natural in this situation»; «People often feel ashamed when talking about such experiences»; «Don't hold back your tears; crying can help.»
Inform the child about what will happen next. Do not fabricate, provide false information, or make unfounded promises.
Offer support: «Is there anything I can try to help with?»
Ask if the child wants to contact someone close to them.
Accept their refusal.
Ensure confidentiality, but inform the child that if a crime has been committed, circumstances might require you to disclose information to the appropriate authorities.
Show the child interest and kindness; spend time with them.
Listen more, speak less—it's important to give the child time to express themselves. Don't be afraid of silence; endure it.
Allow the child space to talk about what they want to discuss.
Avoid probing for details. When asking questions, consider whether they satisfy your curiosity or serve to deepen the connection and obtain important information needed for providing help.
Make the child feel that you believe what they are saying.
Assure the child that they are not responsible for what happened to them.
Do not judge. Avoid questions that carry judgment, such as: «Why didn't you seek help/escape?»; «Why did you believe him/her?»; «Why did you agree to this if you knew…?» Such questions usually induce guilt in the child and make them uncomfortable, as they often do not understand the reasons behind their own or others' actions. Additionally, you may not know the child's situation and experiences that could have influenced their behavior.
Do not hug or touch the child unless they ask for it—physical contact may frighten them or «shut them down,» and touch might be associated with traumatic memories, especially in the context of previous abuse.

Attachment No. 11: Procedures for responding to harmful behavior by a parent/ guardian/other adult towards a child

If you observe any form of violence against a child by a parent or guardian—such as the child being yanked, verbally abused, humiliated, or physically struck (e.g., slapped as punishment)—please take action!
Your response to harm restores the child's sense of security and offers a chance for a better future. It can also protect the child's health and even their life!

How you should respond:

NOTICE
Signal that you have noticed a situation involving the mistreatment of a child. Making eye contact may be sufficient to deter the abusive behavior of a parent, guardian, or other accompanying adult. Do not be afraid to observe. You have the right to monitor what is happening on hotel premises or in public spaces.

ESTABLISH CONTACT
When a parent is overwhelmed with emotions and unable to control their violence toward their child, rational arguments are unlikely to reach them. To respond effectively, try to reduce their tension. Ask a simple question, such as: "Excuse me, is something wrong?" You might also draw from your own experiences, for example: "I remember when my children were this age. It's a very challenging time. Can I help with anything?" Sometimes, it is enough to say out loud: "I see that you are having a hard time." or "We all have bad days, and sometimes it's hard to communicate." Just attempting to initiate such a conversation may give the parent pause and help stop the violence against the child. It might also be the beginning of a further discussion leading to calming the situation.

NAME THE SITUATION
Do not criticize or attack, but also do not avoid naming the situation clearly. Calmly but firmly address what concerns you – for example: "*I see that you hit the child."* or "*Please do not hit the child. Please never do that.*»

Attachment 12: Guidelines for the SOM regarding the situation of minors with special educational needs, including disabilities.

Below are the suggested guidelines for use in developing the SOM (Safety and Operational Measures) with regard to minors with special educational needs, including disabilities.
Our intention is to prevent the exclusion of children with special educational needs, including disabilities. The primary principle is to prioritize the welfare of every child, as each child has unique needs and resources.
It is essential to ensure that the presence of minors with special educational needs, including disabilities, is considered in the SOM. It should clearly indicate that these individuals are valued, cared for, and can expect support and understanding.
These guidelines are general in nature, meaning they may not be fully applicable to every type of activity. They are intended to provide insight into key elements of child protection standards for a given hotel. However, they should always be developed with consideration of the hotel's specific needs and capabilities, in line with the overarching principles and objectives of its operation.

It is important to remember that the SOM should be tailored to the nature and type of the hotel.

I. General rules - For all types of hotels

1)Every minor should be treated with the utmost respect and should not be discriminated against based on any characteristics, including special needs, disabilities, race, gender, religion, skin color, national or ethnic origin, language, marital status, sexual orientation, health status, age, abilities, political beliefs, or social status.
2)Show care for the well-being and development of all minors.
3)Consider universal design, reasonable accommodations, and modifications to ensure equal access for individuals with special educational needs, including disabilities.
4)Eliminate barriers that impede minors' independent functioning and expression, including informational, communicational, architectural, and digital barriers.
5)Seek evidence-based methods that are most suitable for the identified individual developmental and educational needs of minors.
6)Involve the family and local community in the development of minors.

II. Recommendations regarding employees - General principle:

1)It is recommended that the hotel ensure the presence of an individual trained and skilled in providing first aid.
2)Any assistance provided to minors with special educational needs, including those with disabilities, must comply with applicable legal regulations and consider the best interests of the minor.

III. Relationships between employees and minors

1)Identification of a minor's situation

Hotel employees are responsible for identifying situations involving minors, including any special needs they may have, to facilitate the completion of tasks where the child is the beneficiary. Information about the minor provided by parents or guardians should be considered. The validity and scope of collecting and processing such data are determined by separate regulations.
It is necessary to:
Identify the individual needs of the minor (as appropriate) and the specifics of their functioning, particularly:Their cognitive, emotional, and social functioning, with special consideration of the minor's disability;
The conditions and methods required to meet the minor's basic needs (physiological, including sensory needs, psychophysical, including safety needs, etc.) and the consequences of deprivation;
The methods the minor uses to regulate their emotions ;
Their responses to physical proximity of others;
The minor's communication methods (language, specific tools, and their types);
Other relevant factors for the minor.

[12]Minors with special educational needs, including disabilities, may have very specific ways of regulating their emotions, including calming themselves down. Therefore, it is important to determine whether these are external regulation strategies (requiring
the caregiver's action—such as hugging, lowering, or softening the tone of voice, specific touch, providing solitude, etc.) or self- regulation strategies that are passive (withdrawal, „shutting down") or active (such as thumb-sucking, closing eyes, rubbing parts of the body after increased movement, verbal or sound activity, crying, shouting, talking, etc.).
It is crucial for the adult present during a difficult situation to remain calm and composed, avoiding reactions of fear or excessive arousal, as the child's nervous system attunes to the emotional state of those around them.
1Recommendation: When preparing documents related to the individual (special, specific) needs of a minor (e.g., an Individual Educational Program), it is important to pay attention to aspects of the minor's protection. If necessary, specify detailed response procedures that are appropriate to the identified needs.
The methods of informing staff about the existence of such individualized procedures should be regulated internally and in accordance with applicable legal regulations.

b)If a high risk of challenging behaviors is identified, including aggressive, self- destructive, or problematic sexual behaviors, it is necessary to:Assess the risk (identify factors that could trigger such behaviors);
Develop an individual intervention procedure, in collaboration with the parents (guardians), based on the minor's needs and characteristics . This procedure should first include a catalog of non-aversive, proactive methods to prevent these behaviors, focusing on building a relationship based on respect and trust.
Next, non-aversive reactive strategies should be proposed (aimed at reducing emotional tension, including protecting the minor and other individuals involved in the behavior).
c)Develop a clear form of mutual communication – in the language or method used by the minor – adapted to the minor's psychophysical capabilities, allowing the minor to express their will, including approval or refusal regarding certain actions or behaviors , where appropriate, utilizing alternative or supportive communication methods .
d)Provide the minor with understandable information about their rights and
responsibilities, as well as the options for obtaining assistance, ensuring that the communication is clear and comprehensible to them.
e)Introduce the minor to the applicable norms and rules of the hotel in an understandable manner, including the consequences of violating these rules for all parties involved.
f)Teach the minor, in an understandable manner, how they should behave in situations that threaten their safety and that of others.
g)Teach the minor, in an understandable manner, which behaviors infringe on the privacy or intimacy of others, and which actions cause harm, pain, or suffering to others.
h)Ensure that the response of the adult does not foster negative attitudes from other minors towards the minor who is the subject of the intervention ; all minors involved in the incident, including witnesses, should be protected.

2)Creating a safe development environment for minors

a)One must familiarize oneself with the minor's situation within the justified scope of their duties and functions.
b)All forms of humiliation, discrimination, degradation, intimidation, defamation, exclusion, or any other type of psychological, physical, or sexual abuse of the minor must be prevented. Immediate action should be taken to address any such situations, including those occurring between minors.
c)According to needs and circumstances, the following actions are recommended:
Conduct psychoeducational and preventative sessions aimed at combating all forms of discrimination and violence, and raising minors' awareness of every individual's right to dignity.
Provide parents (or guardians) with information about any existing problems and collaborate with them on these matters.

[14]This does not apply to healthcare services where objections and consent are regulated by separate provisions.
[15]Augmentative and Alternative Communication (AAC) – the use of communication aids, forms, and methods for receiving and sending messages, including spoken and written communication, that support, complement, or replace speech to enable
functional communication. It includes processes that either supplement (augmentative communication) or replace (alternative communication) natural speech and/or writing to **maximize** the communication skills of its users (AAC users), which are essential for effective communication and social functioning in daily life (Grycman M., Kaczmarek B.B., Podręczny słownik terminów AAC (komunikacji wspomagającej i alternatywnej), Impuls, Kraków 2014).
[16]Explanation: This provision aims to highlight the approach to intervention. There are situations where, if a caregiver tries to protect one of the dependents but does so improperly, the other minors may exclude the caregiver from the group

d)Supporting the minor in self-care activities: • If assistance is necessary for the minor's self-care and hygiene activities due to their level of functioning, it should be provided in the least intrusive manner possible. • Efforts should be made to gradually reduce the minor's reliance on external help, if feasible. • When providing support, it should be done in a way that avoids causing discomfort, humiliation, or ridicule by others. • Support should be provided safely, respecting privacy, and with the possibility of supervision by other staff members.
e)In cases of suspected or revealed harm, the minor should always be given the opportunity to express themselves and present their opinion, keeping in mind
that this may be their first and only chance to speak (the child may not seek further support). It is particularly important to:
-Express concern by affirming belief in the minor;
-Assure the minor that they did the right thing by talking about the harm they experienced;
-Explain to the minor that they are not to blame for the situation;
-Clearly condemn any form of violence, giving a clear signal that it is unacceptable and must be prevented/stopped;
-Inform the minor that appropriate individuals will handle the matter, including providing information that actions will be taken to ensure their safety and that they are not responsible for what happened.

3) Prohibited behaviors for employees

a)Discussing the minor's situation, including family, health, etc., in the presence of unauthorized individuals;
b)Making derogatory comparisons with others;
c)Isolating the minor in a closed room, holding doors shut, or restricting movement by tying; direct coercion is only permissible in situations outlined by the Mental Health Protection Act and in accordance with its provisions
d)Intentionally provoking or escalating difficult or undesirable behaviors in the minor;
e)Overstepping or excessively supervising the minor beyond what is necessary, including during self-care and hygiene activities;
f)Ignoring or superficially addressing the minor's reported needs for support and help;
g)A passive attitude by employees regarding the minor's development and safety when their well-being is at risk.

[17]The need to use physical restraint on a child is always a signal that the existing response procedures for challenging situations are insufficient. It is an urgent call to review the quality and appropriateness of the support, therapy, and care being provided.
[18]The need to use physical restraint on a child is always a signal that the existing response procedures for challenging situations are insufficient. It is an urgent call to review the quality and appropriateness of the support, therapy, and care being provided.

4) Procedure for responding to difficult, aggressive, or violent behavior by a minor
The purpose of this procedure is to ensure the safety of all minors and adults present in the hotel in the event of a situation that poses a threat to the safety, health, or life of these individuals.

Scope of Procedures:
-Violation of physical integrity of others;
-Psychological abuse, infringement of personal dignity;
-Fights, assaults;
-Creation of threats to one's own and others' health and life;
-Threats of violence;
-Use of dangerous objects;
-Destruction of property.

Scope of Responsibility:
-Each employee may notice or be informed of acts of aggression or violence.
-Each employee is required to respond in cases of aggression or violence (whether as a witness to the incident or as someone informed about it). This includes attempting to stop the situation, ensuring the safety of all parties involved: witnesses, the victim, and the perpetrator—by isolating them.
-The response procedure should be carried out by informing the designated person responsible for taking intervention actions, who will then handle the matter comprehensively, or another decision-maker (e.g., director, specialist).

IMPLEMENTATION PROCESS FOR RESPONDING TO DIFFICULT, AGGRESSIVE, OR VIOLENT BEHAVIOR BY MINORS

- In the event that signs of increased tension, agitation, or difficulties are observed in a minor, which may lead to challenging behavior, including aggressive, self-harming, or threatening behavior, immediate action must be taken to prevent its escalation. This includes having a calming and soothing conversation with
the minor on a neutral topic, if possible (a method of redirecting attention), or
implementing other calming or soothing measures.

- In the event of an escalation of difficult or undesirable behaviors, an attempt should be made to de-escalate or interrupt these behaviors as appropriate to the situation, taking into account previously identified risks of difficult, aggressive, or self-destructive behaviors, as well as the established and implemented individual proactive or non-aversive reactive strategies for minors.

If the actions taken in a given situation are ineffective and there is an escalation of difficult, aggressive, or self-destructive behaviors, the individuals designated for intervention procedures or other nearby staff members should be informed and asked for assistance. These individuals will promptly notify decision- makers or specialists and provide support in the situation.
If very aggressive behavior occurs that cannot be controlled and poses a threat to the health and safety of the individual or others, it is necessary to promptly provide first aid if required, call emergency

services or the police, and then inform the minor's parents or guardians. In this situation, if necessary, possible, and safe for all parties involved, a minimally invasive method to interrupt the act of aggression may be employed.
Ensure the safety of every participant in the event, including witnesses.

- If the circumstances of the incident allow, the person designated in the intervention procedure shall promptly initiate a conversation with the minor, providing them with an opportunity to express their views and opinions in order to determine the causes and circumstances of the incident. During the conversation with the minor, if it does not disrupt the course of the conversation, relevant information should be recorded. After the conversation, a report should be prepared, including details of the entire incident and information provided by witnesses. The parents (guardians) should be informed about the situation.

Until certainty is achieved that the situation has been resolved and the difficult behavior has ceased, the minor must not be left unattended, i.e., «lost from sight»;
The safety of all participants, witnesses, and the provision of support, such as psychological and pedagogical assistance, must be ensured.

Special conditions for the intervention conversation:

- The conversation should be conducted without time pressure or rushing the minor, and should be adapted to the needs and capabilities of the minor. The location for the conversation should consider, among other factors, the minor's sensory processing and reception. The language and communication methods of the minor should also be taken into account.

The person conducting the conversation should be familiar with the minor's emotional regulation methods (e.g., stimming/autostimulatory behaviors) and should know if the minor exhibits challenging behaviors (e.g., aggressive or self- harming behaviors).
-During the conversation, the minor should be allowed to speak freely,
including expressing concerns. The conversation should not be interrupted, criticized, supplemented with personal conjectures, commented on, or the significance of the events minimized.
The conversation should take place in a calm atmosphere. Afterward, the minor should receive appropriate support until the situation stabilizes and their behavior calms down. The minor must not be left alone or out of sight until it is certain that the situation is stable.

Instructions for Employees:

Familiarize yourself with the aforementioned procedure for responding to difficult, aggressive, or violent behavior from minors, including the tasks and processes involved if the procedure is initiated.
Collaborate with the designated individual responsible for implementing intervention procedures in the hotel and follow their instructions during the incident.
Be aware of the contact numbers for those responsible for intervention in the hotel and the decision-makers.
Enhance your skills as necessary to effectively carry out the actions specified in the aforementioned procedure.

Attachment No. 13: Sample declaration of an adult concerning the relationship with a minor

Statement

I, …… residing at ……(name and surname of the person responsible for the child) (residential address) identification card number (series and number) ……..
being authorized to care for ……(name and surname of the child) PESEL number ……., residing at ……(child's PESEL number) (child's address) ……
hereby declare that the parents/legal guardians of the child have consented to my care of the child, and I am authorized to provide care, manage current affairs, and handle emergencies related to the care of the aforementioned child during their stay at hotel…….……..... from ……(full name of the hotel, location) (duration of the hotel stay).
Furthermore, I declare that there is a familial relationship between myself and the aforementioned child: ……
(please specify the degree of relationship)
I am aware of the criminal liability for making a false declaration under Article 233 § 6 of the Act of June 6, 1997 - Penal Code.

……. (Legible signature)

[19] Article 233 of the Penal Code (Extract) Anyone who, while giving testimony intended to serve as evidence in court proceedings or in other proceedings conducted under the law, either provides false information or conceals the truth, shall be subject to imprisonment for a period ranging from 6 months to 8 years. The provisions also apply accordingly to a person who makes a false declaration if the law provides for the possibility of receiving such a declaration under the threat of criminal liability.

Attachment No. 14: Sample declaration for organized groups submitted by the organizer

Statement

I, as the organizer,
……...
……(organizer's details and address), hereby I authorize Mr./Ms……
.....……
.....(full name of the authorized person)……
holding an ID card (series and number) ……

I declare that the parents/legal guardians of the child/children have given their consent for supervision of the child/children, and I am the person authorized to provide care, manage current matters, and handle emergencies related to the care of the entire group during their stay at the hotel.....(full hotel name, location) for the period.....(full hotel name, location).

I also declare that there is only a supervisory relationship between the person authorized to care for the organized group and the group itself.

I am aware of the criminal liability for submitting a false statement under Article 233 § 6 of the Penal Code of June 6, 1997. 20

…….(legible signature of the organizer)

[20] Article 233 of the Penal Code (excerpt)
Whoever, while giving testimony intended to serve as evidence in judicial or other proceedings conducted under the law, testifies falsely or conceals the truth, shall be subject to imprisonment from 6 months to 8 years. These provisions apply accordingly to persons who submit false statements if the law provides for the possibility of obtaining such statements under the threat of criminal liability.

Attachment No. 15: Standards for the Protection of Minors - short version for children

standards

for child protection

Violence and harm are, unfortunately, very common and can occur in families, schools, and other places where you may be. You may also experience such occurrences in the online space, for example, during classes, communication with others, or gaming.

YOU ARE NOT ALONE

We want to protect you from various forms of harm, including physical and psychological aggression, and if you ever feel that you are struggling with a problem or crisis — **you are not alone.**

SAFETY

Our top priority is to ensure your safe development, and for this purpose, we have introduced Child Protection Standards.

The Child Protection Standards are not only our obligation but also the path to building relationships and creating a friendly space for you.

Together, we will be able to support you in a way appropriate to the situation.

DeSilva

Your safety is our priority

We want to protect you from various forms of harm, including physical and psychological aggression.

RESPECT? ABSOLUTELY!

You are the most important person, without whom our actions would have no meaning. We respect your rights.

VIOLENCE? NO WAY!

If you are struggling with a problem or crisis, or if someone from your environment is facing such an issue, you are not alone. Tell us about it, together we can do more!

INTERNET: YES OR NO?

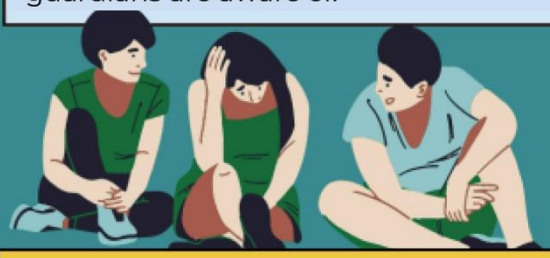
When using the Internet, be careful.

WE ARE DIFFERENT

We are all different, but each of us is unique. Thanks to this, we can learn from each other.

SAFE SPACE

We will only meet with you in a place that you know and where your parents/ guardians are aware of.



PHOTOS – YOU HAVE THE RIGHT TO DECIDE

We care about your privacy, so if you don't want to be in photos, you have the right to say NO.

YOU HAVE THE RIGHT TO KNOW

You have the right to know what we are doing to protect you. The full version of our Protection Standards is available in our office or on our website.

YOU HAVE THE RIGHT TO ACCESS SUPPORT

If something is happening to you (or in your family, environment) or if you just need to talk to someone, let us know or call the following numbers:

116111 – Trust Helpline for Children and Youth;
800121212 – Children's Ombudsman Trust Helpline.

WHAT ARE THE STANDARDS FOR PROTECTING MINORS AND WHY WERE THEY IMPLEMENTED?

Violence and harm are unfortunately common and can occur in families, schools, and other places you frequent. You may also encounter these issues in the online space, such as during communication with others or while gaming.
Our primary value is ensuring your safety. To this end, we have implemented Child Protection Standards, which are not only a legal requirement but also a guide for creating a welcoming environment in our hotels.
Get to know us better and familiarize yourself with our core values. If you have any suggestions or would like to add something, please let us know! We are open to your proposals, as your input helps us improve even further.

1.YOUR SAFETY - OUR PRIORITY

We want to protect you from various forms of harm, including physical and psychological aggression...

2.VIOLENCE? ABSOLUTELY NOT!

If you experience a situation where someone harms or humiliates you, or if you know someone else is having such a problem, report it to a hotel staff member, such as at the reception. We take every such report seriously and will investigate it thoroughly.

3.RESPECT? OF COURSE!

You are our most important guest. Therefore, we respect your rights, particularly your dignity, and strive to ensure your safety. We communicate with you with respect, patience, and understanding.

4.PHOTOS – YOU HAVE THE RIGHT TO DECIDE

We value your privacy. If you do not want to be photographed, you have the right to say «NO.» We respect your right to refuse and will not impose any sanctions. You should not feel any lesser for your decision. It is your choice, and we respect it.

5.INTERNET – YES OR NO?

Be cautious when using the Internet. Unfortunately, you may encounter websites that are inappropriate or where you might see violence or aggression. Inform your parents or us if this occurs. Remember, people online may lie and provide false information, so avoid sharing too many details about yourself, including your address or phone number, even in games.

6.SAFE SPACE

Sometimes, someone might «steal» another person's account, such as on Facebook. Therefore, do not accept invitations from people you do not know or have never met in person. Also, do not send texts to unfamiliar numbers. If you receive a concerning message while staying at our hotels, report it to your parents/guardians or us. We will clarify the situation and inform you of the resolution.

7.RIGHT TO KNOW

You have the right to know what we are doing to protect you. You can find the full version of our child protection standards in our hotels or on our website.

8.RIGHT TO ACCESS SUPPORT

Everyone has bad days, and we understand this fully. However, if something bad is happening to you (or in your environment) or if you simply need someone to talk to, let us know or call the following numbers:
116111 – Child and Youth Helpline;
800121212 – Child Helpline, operated by the Ombudsman for Children The professionals there will provide you with useful advice and help solve your problems. If you are concerned about your health or life, call the police emergency number: 112.