



STANDARDS FOR THE PROTECTION OF MINORS AT ATRIUM HOTEL IN KRAKÓW

Preamble

Taking into account the United Nations guidelines on business and human rights, recognizing the important role of business in ensuring respect for children's rights, in particular their right to dignity and freedom from all forms of harm, and pursuant to the Act of July 28, 2023, amending the Family and Guardianship Code and certain other acts, ATRIUM HOTEL in Kraków adopts this document as the principles and procedures in cases of suspected harm to a child staying at ATRIUM HOTEL in Kraków and in preventing such risks. The child protection policy at ATRIUM HOTEL in Kraków will be implemented through the following principles.

- **General Principles**

1. ATRIUM HOTEL in Kraków conducts its operations with the utmost respect for human rights, particularly the rights of children, as individuals particularly vulnerable to harm.
2. ATRIUM HOTEL in Kraków recognizes its role in conducting socially responsible business and promoting desirable social attitudes.
3. ATRIUM HOTEL in Kraków particularly emphasizes the legal and social obligation to notify law enforcement authorities of any suspected crime against children and commits to training its staff in this regard.
4. ATRIUM HOTEL in Kraków is committed to educating its staff on circumstances indicating that a child staying on the premises may be harmed and on how to respond quickly and appropriately to such situations.

5. The manager of each organizational unit of the Hotel (i.e., reception, restaurant, housekeeping, office) is responsible for training their subordinates on the protection of minors on the premises of ATRIUM HOTEL in Kraków.
6. Each newly hired employee is required to undergo an initial training on the protection of minors described in this document, confirmed by a signed statement of familiarity with these principles. A template of the statement is attached as Annex 4.
7. One of the effective forms of preventing harm to children is the identification of a child staying on the premises and their relationship with the adult accompanying them. Staff will take all possible steps to identify the child and their relationship with the adult they are with.

- **II. Procedure for Check-In of Guests Traveling with Minors**

1. Each time an adult traveling with minors performs the check-in procedure at the Hotel reception, they are required to submit a declaration to identify the child and their relationship with the accompanying adult using a form provided by the reception staff. A template of the form is attached as Annex 3.
2. Every Hotel employee is required to pay particular attention to the relationship between the minor and the adult accompanying them, including observing the child's behavior toward the accompanying adult, the child's appearance, and behavior (e.g., being anxious, nervous, or avoiding eye contact), as well as the adult's behavior toward the child.
3. In the event that the adult traveling with the child refuses to submit the declaration described in Section 1 above, or in cases of reasonable doubts regarding the child's safety, the "procedure for suspected child abuse" described below must be initiated without **exception**.

- **III. Procedure in the Event of Suspected Child Abuse**

1. Whenever possible, the identification of the child and their relationship with the adult they are staying with at the facility should be conducted.

2. In unusual and/or suspicious situations that suggest a potential risk of child abuse, identification must be carried out by the reception staff. Examples of situations that may raise suspicion are listed in Appendix 1 of these standards.
3. To identify the child and their relationship with the adult they are staying with at the facility, the following steps should be taken:
 - a. Ask for the child's identity and their relationship to the adult accompanying them. A document proving the child's identity or another document confirming that the adult has the right to care for the child at the facility can be requested. A list of example documents is provided in the footnote below. If no identity document is available, the child's details (name, surname, address, PESEL number) can be requested.
 - b. If there are no documents showing the relationship between the child and the adult, ask both the adult and the child about their relationship. A sample conversation framework with the adult and child is provided in Appendix 2.
 - c. If the adult is not the child's parent or legal guardian, ask whether they have a document showing parental consent for the adult's trip with the child (e.g., written statement).
 - d. If the adult does not have a parental consent document, ask for the parents' contact number to confirm the child's stay at the facility with the adult, with the parents' knowledge and consent.
4. If the adult resists showing the child's document and/or identifying their relationship, explain that the procedure is designed to ensure the safety of children at ATRIUM HOTEL in Kraków and was developed in cooperation with non-governmental organizations specializing in this matter.
5. After clarifying the situation positively, thank the adult for taking the time to ensure the child is in good care and emphasize once again that the procedure is in place to ensure the safety of children.
6. If the conversation does not resolve doubts regarding the adult's intentions to harm the child, discreetly notify the supervisor and security personnel (if present at the facility). To avoid raising suspicion, you can refer to the need to use

equipment behind the reception, asking the adult and child to wait in the lobby, restaurant, or another area.

7. From the moment the first doubts arise, both the child and the adult should be under constant observation by the staff and should not be left alone.
8. The supervisor, upon being notified of the situation, will decide whether to notify the police or, in case of doubts, will take over the conversation with the suspected adult to obtain further clarification.
9. If the conversation confirms the suspicion of an attempt or commission of a crime against the child, the supervisor will inform the police. The procedure described in Section IV of these standards will then be followed in the case of circumstances indicating child abuse.
10. If employees from other departments, such as cleaning staff, room service, bar and restaurant staff, witness unusual and/or suspicious situations, they should immediately report it to their supervisor, who will decide on appropriate action.
11. Depending on the situation and location, the supervisor will verify whether the suspicion of child abuse is justified. They will select appropriate measures to clarify the situation or decide to intervene and notify the police.

• **IV. Procedure in Case of Circumstances Indicating Child Abuse**

1. If there is a reasonable suspicion that a child staying on the premises is being abused, the police must be notified immediately by calling 112 and describing the circumstances of the incident. Depending on the situation's dynamics, the call should be made by the person who directly witnessed the incident (employee/supervisor). If the notifying person is an employee, they must also inform their supervisor about the incident.
2. Reasonable suspicion of child abuse arises when:
 - a. The child discloses to a staff member that they are being harmed,
 - b. A staff member observes harm being inflicted on the child,
 - c. The child shows signs of harm (e.g., scratches, bruises) and, when questioned, responds inconsistently and/or chaotically, appears embarrassed, or other circumstances suggest harm (e.g., discovery of pornographic materials involving children in an adult guest's room).

3. In such cases, steps must be taken to prevent both the child and the suspected abuser from leaving the premises.
4. In justified cases, a citizen's arrest of the suspected person may be made. Until the police arrive, the person should be monitored by two staff members in a separate room, away from other guests' view.
5. In every situation, the child's safety must be ensured. The child should remain in the care of a staff member until the police arrive.
6. If there is reasonable suspicion of a crime involving the child's contact with the perpetrator's biological material (e.g., semen, saliva, skin), efforts should be made to prevent the child from washing or eating/drinking until the police arrive.
7. After the police take charge of the child, any CCTV footage and other relevant evidence (e.g., documents) related to the incident should be secured and handed over to the prosecutor or police upon request, either by registered mail or in person.
8. Following the intervention, the incident must be documented in an incident log or other designated document.

- **V. Rules Ensuring Safe Relationships Between Minors and Hotel Staff**

1. All Hotel staff and other adults who interact with children on the premises with the Hotel's consent are required to follow the rules below.
2. The overarching principle of all actions taken by staff interacting with children on the Hotel premises is to treat the child with respect, dignity, and consideration for their needs.
3. Any form of violence against children by staff or other adults is strictly prohibited.
4. Relationships between staff and children: Each staff member is required to maintain a professional relationship with children and always consider whether their actions, communication, or behavior toward the child are appropriate, safe, justified, and fair. Staff should act openly and transparently to minimize the risk of their behavior being misinterpreted.
5. Communication and cooperation with children:

- **Expected behaviors and practices for staff:**

1. Communication with children must be patient and respectful,
2. Children must be listened to carefully, and responses should be appropriate to their age and situation,
3. When communicating with a child, make an effort to position your face at the child's eye level,
4. Respect the child's right to privacy,
5. Inform the child where the Standards for the Protection of Minors are located in a version they can understand, and reassure them that they can approach any staff member with questions,
6. Ensure equal treatment of all children, regardless of gender, sexual orientation, ability/disability, social status, ethnicity, culture, religion, or worldview,
7. If a child or children are found unattended and their safety may be at risk, steps must be taken to locate their parent/guardian.

- **Prohibited behaviors and practices for staff toward children in the Hotel:**

1. Shaming, humiliating, dismissing, or insulting a child, as well as yelling at them,
2. Disclosing sensitive information about a child to unauthorized persons, including other children,
3. Acting inappropriately in the presence of children,
4. Forming romantic or sexual relationships with a child or making inappropriate proposals, including sexually suggestive comments, jokes, gestures, or sharing erotic/pornographic content with children, regardless of its format,
5. Recording the image of a child (e.g., filming, voice recording, photographing) for private or professional purposes without the consent of the child's parent/guardian and the child themselves. Exceptions apply when the child's image is an incidental part of a larger scene (e.g., an assembly, landscape, or public event), in which case parental consent is not required,
6. Offering children alcohol, tobacco products, or illegal substances, or consuming them in the presence of children,
7. Physically harming a child in any way (e.g., hitting, pushing), unless it is necessary to prevent immediate danger to the child's health or life,

8. Establishing contact with a child via private communication channels (e.g., personal phone, email, social media) or meeting with them outside the workplace,
9. Touching a child in a way they do not want or in a manner that may be considered inappropriate or indecent.

If a staff member witnesses any of the behaviors or situations described above involving other adults or children, they must inform the person responsible for implementing and monitoring the Standards for the Protection of Minors or their direct supervisor.

VI. Glossary

1. **Hotel** refers to the ATRIUM HOTEL in Kraków at Krzywa Street 7, owned by EPOL HOLDING sp. z o.o. with its registered office in Łódź.
2. **Child** refers to any person under the age of 18.
3. **Unrelated adult** refers to any individual over the age of 18 who is not the child's parent or legal guardian.
4. **Child abuse** means committing a crime against the child.
5. **Crimes against children** – all crimes that can be committed against adults, as well as crimes that can only be committed against children (e.g., sexual abuse under Article 200 of the Penal Code). Given the nature of tourist facilities, where seclusion is easily accessible, the most common crimes likely to occur on the premises are those against sexual freedom and morality, particularly rape (Article 197 of the Penal Code), sexual exploitation of incapacity or helplessness (Article 198), sexual exploitation of dependency or critical position (Article 199), sexual exploitation of a person under 15 years of age (Article 200), and grooming (seduction of a minor via remote communication – Article 200a of the Penal Code).

Attachment No. 1: Examples of Situations that May Raise Suspicions or Indicate Child Abuse

WARNING! The presence of certain indicators does not automatically mean that a minor is being abused. It is important to remain vigilant and pay attention to

situations that may raise concerns. A troubling situation can also occur when the relationship between an adult and a child does not appear natural or nurturing.

RECEPTION

<p>A guest refuses to provide their personal details or the child's details.</p>	<p>A guest takes the child directly to the room, appearing to avoid any interaction between the child and the reception staff.</p>
<p>A guest claims they do not have identification for themselves and/or the child, offering no explanation.</p>	<p>A guest checking in with a child invites other individuals who are not staying at the property (these individuals may appear only briefly).</p>
<p>A guest pays in cash or with a prepaid card. They pay daily (unsure how long they will stay) or have someone else pay for their stay.</p>	<p>A guest rents a room by the hour, for less than a full day, or for an unusually long period.</p>
<p>A guest brings gadgets or items that could be presented to the child as gifts.</p>	<p>A guest traveling with a child has no luggage or only very light luggage (e.g., a small bag or briefcase).</p>
<p>A guest appears at the property with a child who was not previously checked in.</p>	<p>A guest behaves toward the child in a sexualized manner, and the relationship between the adult and child does not seem natural or nurturing.</p>
<p>A guest with a child rents a room with fewer beds than registered guests—e.g., a single bed for an adult and child.</p>	<p>The child is dressed inappropriately for the weather or in a manner inconsistent with the adult accompanying them.</p>
<p>During check-in, the child appears anxious, stressed, or unwilling to be in the property with the adult.</p>	<p>Children seen selling small items or begging outside the property.</p>

RESTAURANT AND BAR

A guest enters the restaurant or bar with a child who was not registered as a guest.	Outsiders, not registered at the property, seem to be looking for customers and offering something (possibly attempting to facilitate contact with children).
A guest inquires about adult sexual services, including those involving young people (e.g., overheard conversations in the bar or restaurant).	Teenagers wait at a table or bar for an adult who picks them up but does not appear to be their parent or guardian (this could be a client, pimp, or trafficker).
Children, seemingly unsupervised, ask for food, drinks, or money.	Cash transactions between an adult and a child raise suspicions of payment for services.
Children appear nervous, agitated, and avoid eye contact.	During their stay, an adult and child do not visit the dining area for breakfast.
An adult behaves in a sexualized manner toward a child, demonstrating a relationship that is neither natural nor nurturing.	An adult provides alcohol to a child.

CLEANING STAFF

A "Do Not Disturb" sign is constantly displayed on the door of a room occupied by children.	Refusal to allow room cleaning for the entire duration of the stay.
Large amounts of cash noticed in the room (potentially indicating illegal payments).	Children left unsupervised for long periods in the room or not leaving the room at all (e.g., food is brought to them).
Numerous computers, mobile phones, or card readers observed in the room.	Adults and children rarely leave the room, only going out during hours when few other guests are present.

Children's clothes or toys are found in the room, even though no child was registered as a guest.	Adults not staying at the property linger in the lobby, seem to be monitoring the area, and communicate with a guest traveling with a child.
Large quantities of alcohol or drugs found in the room where an adult is staying with a child.	Condoms or similar items are visible in a room occupied by an adult and child.

**Attachment No. 2: Sample Script for Conversations with Adults and Children
During Identification**

When speaking with an adult, it is important to remain calm, polite, and patient.

At the start of the conversation, inform the adult that the [facility/hotel/hotel chain] has child protection procedures in place, and that staff may need to ask additional questions to verify the child’s details or the adult’s relationship with the child.

There may be situations where the adult feels uncomfortable, expresses opposition, or dissatisfaction. This does NOT necessarily mean they are a potential perpetrator.

Example Conversation with a Guest:

"Our facility/hotel has child protection procedures in place. Therefore, at check-in, we require identification documents for all registered guests. Does the child have identification?" (e.g., ID card, passport, or other documents).

If the child does not have identification, or after reviewing it there is uncertainty about the adult’s status as the legal guardian, consider asking the following questions to clarify the situation:

- What is the child’s name, and how old are they?
- Are you the legal guardian of the child? Or, are you related to the child? Do you have documentation authorizing you to care for the child?
- Do you have a statement from the child’s guardians confirming the child is under your care?
- Can you provide a contact number for the child’s guardians so we can verify?

- What is the purpose of your trip with the child?

Example Conversation with the Child:

- 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 person well?
- Where are your parents? We would like to contact them—do you have their phone number?

If the adult is responsible for the child, explain that you wish to speak with the child. If the adult hinders contact with the child, emphasize that if the child’s identity cannot be verified, you will need to notify the police.

Attachment No. 3: Template for Guest Declaration on Relationship with a Child

DECLARATION REGARDING MINORS

Guest's Full Name:

Date of Check-in:

In accordance with the child protection procedure applicable under Article 22c(3)(2) of the Act of May 13, 2016, on counteracting sexual crime threats and protecting minors, I hereby provide the names of the minors accompanying me and specify the nature of my relationship with them:

Name and surname of a child		A relationship between the guest and the child

Guest's Signature:

Providing this information is necessary for check-in at the hotel. Failure to provide the information may require the hotel staff to identify the child and their relationship with the adult they are staying with at the hotel and/or refusal of check-in at the hotel. If identification of this information is obstructed, hotel staff is authorized to notify the police. These actions aim to protect children from harm, and we ask you to respect the applicable rules.

INFORMATION CLAUSE

I. Data Controller

The data controller is EPOL HOLDING limited liability company, based in Łódź at the following address: 90 - 042 Łódź, Targowa 9a, registered in the National Court Register under KRS number 0000357354 (filed by the District Court for Łódź-Śródmieście in Kraków, XX Commercial Department of the National Court Register), with a share capital of 20,800.00 PLN, NIP: 7272800310, REGON: 364088429, phone: (hereinafter: "Controller" or "Company").

II. Contact for Data Protection Matters

You can contact the data protection department via email at office@epolholding.com or by mail at the address provided in Section I.

III. Purpose and Legal Basis for Processing

Your personal data will be processed for the following purposes:

- To implement the procedure for the protection of minors from harm, established based on Article 22c (3) point 2 of the Act of May 13, 2016, on preventing threats related to sexual offenses and protecting minors (Article 6(1) (c) of the GDPR).
- To pursue the legitimate interest of the Controller, which involves demonstrating compliance with the principles of child protection mentioned above (Article 6(1) (f) of the GDPR).

IV. Categories of Data We Process

We process the following personal data: your first and last name, the first and last names of the children, and the nature of the relationship between you and the children accompanying you.

V. Information about the Requirement/Voluntariness of Providing Data

Providing personal data is necessary to use hotel services. The consequences of not providing data are indicated above.

VI. Data Retention Period

Personal data will be processed for a period equal to the duration of processing the data contained in the registration card (see the information clause on the back of the registration card).

VIII. Data Recipients

Data will not be transferred to third parties, except for authorities authorized to intervene in matters related to child protection.

IX. Rights of Data Subjects

You have the right to access your data and request their correction (if they are incorrect), deletion, or limitation of processing (in cases provided for by applicable law). To the extent that the basis for processing your personal data is the legitimate interest of the Administrator, you have the right to object to the processing of your personal data. To the extent that the basis for processing your personal data is consent, you have the right to withdraw your consent. Withdrawing consent does not affect the lawfulness of processing before the consent was withdrawn. You also have the right to data portability, i.e., to receive from the Administrator your personal data in a structured, commonly used, machine-readable format. The right to data portability does not apply to data that constitute business secrets and must not adversely affect the rights and freedoms of other individuals, including trade secrets or intellectual property. This right will be exercised to the extent technically possible. The first copy of the data is free of charge. Additionally, you have the right to receive copies of the safeguards mentioned in point XII.

To exercise the above-mentioned rights, please contact the Administrator at the correspondence address specified in point I or the email address provided in point II.

X. Right to Lodge a Complaint with the Supervisory Authority

You also have the right to lodge a complaint with the supervisory authority, which is the President of the Personal Data Protection Office (00-193 Warsaw, ul. Stawki, email: kancelaria@uodo.gov.pl).

XI. Automated Decision-Making

The data you provide will not be used in processes of automated decision-making (including profiling).

XII. Data Transfer to Third Countries or International Organizations

Data will not be transferred outside the EEA (European Economic Area).