



NAJLEPSZY WYPOCZYNEK
W POLSCE

Hotele i Ośrodki Wypoczynkowe w Polsce

CHILD PROTECTION PROCEDURES

AT NADWIŚLAŃSKA AGENCJA TURYSTYCZNA SP. Z O.O.

BASED IN TYCHY

Preamble

Bearing in mind the content of the United Nations Guiding Principles on Business and Human Rights, recognising the important role of business in ensuring respect for children's rights, in particular the right to protection of their dignity and freedom from all forms of harm, Nadwiślańska Agencja Turystyczna Sp. z o.o., with its registered office in Tychy, adopts this document as a set of rules and procedures in the event of suspicion of harm to a child who is on the premises of Nadwiślańska Agencja Turystyczna Sp. z o.o. and the prevention of such risks.

We will implement the child protection policy on our network through, among other things, the following policies:

1. Nadwiślańska Agencja Turystyczna Sp. z o.o., based in Tychy, conducts its operational activities with the utmost respect for human rights, in particular the rights of children as vulnerable persons.
2. Nadwiślańska Agencja Turystyczna Sp. z o.o., based in Tychy, recognises its role in conducting socially responsible business and promoting desirable social attitudes.
3. Nadwiślańska Agencja Turystyczna Sp. z o.o., based in Tychy, in particular stresses the importance of the legal and social obligation to notify the law enforcement authorities of any suspected offence committed against children and undertakes to train its staff in this regard.
4. Nadwiślańska Agencja Turystyczna Sp. z o.o., based in Tychy, undertakes to educate staff on circumstances indicating that a child in network facilities may be harmed and on how to respond quickly and appropriately to such situations.
5. One form of effective child abuse prevention is the identification of the child in the facility and his/her relationship to the adult with whom he/she is in the facility. Staff take all possible steps to carry out the identification of the child and his/her relationship to the adult with whom he/she is in the facility.
6. With the above in mind, it is pointed out that:
 - a. from 15 August 2024, each facility of Nadwiślańska Agencja Turystyczna Sp. z o.o., based in Tychy, will identify Minors staying at our facility,
 - b. facilities display a prominent notice in - a space accessible to the public - that the facility cares about the safety of children and applies the Standards for the Protection of Minors,
 - c. Nadwiślańska Agencja Turystyczna Sp. z o.o. shall make the Standards available on its website and include relevant information on their implementation and related

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requirements in all sales channels, contracts, terms and conditions of participation and facility regulations.

- d. Coordinators at each facility and a Central Coordinator are established.

I. Procedure for identifying a child and dealing with suspected child abuse

1. Whenever possible, identification of the child and his/her relationship with the adult with whom he/she is in the facility should be made.
2. In unusual and/or suspicious situations, indicating a possible risk of child abuse, identification is compulsorily carried out by a member of the reception staff. Examples of situations that may raise suspicion are included in Appendix 1.
3. In order to identify the child and his/her relationship to the person with whom he/she is staying in the hotel, it is necessary to:
 - a. Ask for the child's document (identity card, passport, school card] and record the child's details in the hotel guest register.
 - b. Ask about the child's relationship to the person with whom they have come to or are staying at the facility.
 - c. In the absence of documents indicating the relationship between the child and the adult, the adult and the child should be asked about this relationship. An example of an adult and child interview scheme can be found in Appendix 2.
 - d. If the adult is not the child's parent or legal guardian, ask if they have a document showing parental consent for the adult to travel with the child (e.g. a written statement].
 - e. If the adult does not have a parental consent document, ask for the phone number or email address of the above to call and confirm that the child is staying at the facility with a strange adult with the knowledge and consent of the parents/legal guardians.
 - f. If the above measures are not effective, ask an adult to complete a statement [Appendix 4].
4. In the event of resistance on the part of the adult to show the child's document and/or indicate the relationship, it should be explained that the procedure is designed to ensure the safety of children using the Facility and has been developed in consultation with NGOs working on the subject.
5. Once the matter has been cleared up in a positive way, you should thank them for taking the time to make sure the child is well looked after, apologise for any inconvenience caused by the explanations and emphasise once again that the procedure is designed to keep children safe.
6. If the conversation does not allay any doubts about the suspicion towards the adult and their intentions to harm the child, the supervisor and security staff (if they are on the premises at the time] should be discreetly informed. In order not to arouse suspicion, you could, for example, invoke the need to use the equipment at the back of reception by asking the adult to wait with the child in the lobby, restaurant or other area.



7. From the moment the first concerns arise, both the child and the adult should be under constant observation by staff and not left alone.
8. The Supervisor or Coordinator who has been alerted to the situation will decide whether to notify the police or, if in doubt, take over the conversation with the suspect adult for further clarification.
9. If the conversation confirms the belief that a child has been attempted or committed, the supervisor shall notify the police. Further procedure is followed in case of circumstances indicating harm to the child.
10. If unusual and/or suspicious situations are witnessed by employees of other departments of the Facility, e.g. cleaning service, room service, bar and restaurant staff, relaxation area, facility security, etc., they should notify their supervisor immediately, who will decide on appropriate action to be taken.
11. Depending on the situation and location, the supervisor verifies to what extent the suspicion of child abuse is justified. To this end, he or she selects appropriate measures leading to clarification of the situation or decides to intervene and notifies the police.
12. Ultimately, in the case of grounds under the Act, the NAT Board makes the final decision to refer a report to the competent authority on the possibility of a criminal offence at the request of the Coordinator or the Central Coordinator.

II. Procedure in case of circumstances indicating harm to a child

1. If you have a reasonable suspicion that a child staying in a hotel is being abused, you should immediately notify the police by calling 112 and describing the circumstances of the incident. Depending on the dynamics of the situation and the circumstances, the call is made by the person who directly witnesses the incident (employee/supervisor). If the notifier is an employee, he/she shall simultaneously inform his/her supervisor of the incident.
2. Reasonable suspicion of child abuse occurs when:
 - a. the child has disclosed the abuse to the worker,
 - b. employee observed harm,
 - c. the child shows signs of abuse (e.g. scratches, bruises) and when asked responds incoherently and/or chaotically and/or becomes confused or there are other circumstances that may indicate abuse, e.g. finding child pornography in an adult's room,
3. In this situation, the child and the person suspected of harming the child should be prevented from leaving the premises.
4. In justified cases, a civil detention of a suspected person may be made. In such a situation, until the police arrive, the person should be kept in a separate room away from the view of other visitors, under the supervision of two staff members.
5. In all cases, the child's safety must be ensured. The child should be in the care of a member of staff until the police arrive.



6. If there is a reasonable suspicion that a crime has been committed involving contact of the child with the perpetrator's biological material (sperm, saliva, epidermis), the child should be prevented, if possible, from washing and eating/drinking until the police arrive.
7. Once the child has been collected by the police, the CCTV footage and other relevant evidence (e.g. documents) relating to the incident should be secured and, if requested by the service, a copy should be forwarded to the public prosecutor or the police by registered mail or in person.
8. After the intervention, the event should be described in an event log or other document intended for this purpose.
9. In the event of suspected child abuse by a member of staff or other adult who is not directly employed by [Facility/Hotel/Network] but by a third party, the person who becomes aware of this information should immediately inform the Coordinator or, in the absence of the Coordinator, another person designated for this purpose.

III. Procedure for violence against children with disabilities or special educational needs

1. Nadwiślańska Agencja Turystyczna Sp. z o.o. in Tychy undertakes to regularly educate staff on how to handle children with disabilities or special educational needs.
2. As part of their training, staff should familiarise themselves with how to deal with a child with a disability whose behaviour on the premises may indicate that they are experiencing violence from a carer.
3. Recognising the symptoms of abuse of underage disabled visitors to facilities is an extremely difficult task. Facility staff usually do not have knowledge of the type of disability of the minor visitor, the pattern of behaviour that characterises a person with a particular disability and the specifics of his or her individual relationship with the caregiver. An important factor that makes it difficult to identify symptoms that may indicate that a child is being abused is the timing of the employee's contact with the minor during the course of their work activities.
4. As part of their tasks, facility staff should pay particular attention, as they do with minor visitors with disabilities, to:
 - a. visible injuries,
 - b. inconclusive or contradictory information or refusal by the carer to explain the reasons for the child's injury,
 - c. unreliability, inconsistency of the child's stated explanations of injuries,
 - d. anxiety evident when the child interacts with a carer or other adult,
 - e. humiliation, insulting the child by the carer, using pejorative terms, vulgarities towards the child,
 - f. overstepping of acceptable boundaries by the carer in physical contact with the child,
 - g. somatic complaints, i.e. abdominal pain, headaches, vomiting, nausea,
 - h. disturbed contact of the carer with reality, e.g. reacts inappropriately to the situation, expresses himself incoherently and displays other worrying, unusual behaviour,
 - i. isolation of the child from other people,



- j. depressive symptoms, self-harm, suicidal thoughts.
5. A member of the facility staff who, in the course of their duties, observes behaviour of concern in relation to a child and/or their carer, should immediately pass this on to their line manager.

IV. Preparing facilities staff to apply the procedure

1. The persons responsible for the implementation of and compliance with these standards at the facilities of Nadwiślańska Agencja Turystyczna Sp. z o.o. are the directors/managers of the facilities who are also Coordinators of the Standards for the Protection of Minors in the facilities, in accordance with the provisions of Article 22c, paragraph 3, item. 5 of the Act.
2. Facility Directors/Managers or the Central Coordinator are required to train facility staff in the use of the Procedure, including in particular the principles described in Appendix 3. Training is carried out periodically, on a quarterly basis.
3. At least once every two years, Nadwiślańska Agencja Turystyczna Sp. z o.o. will evaluate the standards to ensure that they are adapted to current needs and comply with current legislation. The conclusions of the assessment will be documented in writing.
4. The Central Coordinator monitors and evaluates the SOM at least once every two years. In particular, a continuously updated response plan is created for all incidents that have occurred at the facilities.
5. Monitoring and evaluation involves verifying the implementation of the Standards, responding to signals of breaches of rules and procedures and proposing changes to the document, particularly with a view to adapting it to current needs and complying with current legislation.
6. The Coordinator shall conduct a survey among [Facility/Hotel/Network] employees, once every 2 years, to monitor the level of implementation of the SOM. A model of the survey is attached as Appendix 6.
7. In the survey, employees can suggest changes and indicate violations of SOM policies and procedures at the facility.
8. The coordinator compiles the questionnaires filled in by the workers, draws up a monitoring report on this basis and forwards it to the entrepreneur. The entrepreneur makes the necessary changes to the document and announces the new wording of the Standards for the Protection of Minors to the employees.

V. Final provisions

1. The Procedure for the Protection of Minors at Nadwiślańska Agencja Turystyczna Sp. z o.o., based in Tychy, enters into force on 15 August 2024.



Appendix 1: Examples of situations that may give rise to suspicion or indicate child abuse

NOTE: The occurrence of certain indicators does not automatically mean that abuse of a minor is taking place. It is important to be vigilant and pay attention to situations that may cause concern. Situations of concern will also be those in which the relationship between the adult and the child does not seem relaxed and caring.

RECEPTION

The guest does not want to give his personal data or that of his child.	A guest takes the child directly to the room, giving the impression that he or she does not want the child to make contact with the person working at reception.
A guest states that he does not have his and/or his child's documents; he does not want to give an explanation.	A guest who checks in with a child invites other people who are not guests of the facility, (such people may appear for a short time).
The guest pays in cash or with a prepaid card. He pays every day (he doesn't know how much he'll stay for), or he asks someone else to pay for the night.	A guest rents a room by the hour or not for the whole day; or rents a room for a very long period.
A guest brings with them goodies or items that can be given to the children as gifts.	A guest who arrives with a child has no luggage or arrives with very little luggage (a handy bag/activity bag).
A guest shows up at the facility with a child with whom they have not previously checked in at reception.	A guest behaves towards the child in a sexually charged manner and the relationship between the adult and the child does not appear natural and caring.
A guest with a child rents a room in which there are fewer beds than there are registered persons - e.g. a double bed for an adult.	The child is dressed in a manner inappropriate for the weather or inappropriate in relation to the adult with whom they have come to the facility.
During registration, the child appears anxious, stressed or forced to be in the facility with an adult.	Children selling small items or begging outside the facility.
The child comes to the facility late at night or at a time when they should be at school.	The child does not know where he or she is or, when asked about the destination, gives inconsistent answers.



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A guest comes to the bar or restaurant with a child with whom he or she was not registered in the establishment.	Outsiders, not registered at the facility, seem to be looking for clients and offering them something (possibly wanting to mediate contacts to the children).
A visitor inquires about adult sexual services, including with young people (e.g. overheard conversation in a bar or restaurant).	The teenagers are waiting at a table or in a bar, for an adult to pick them up who does not appear to be their parent or guardian (possibly a customer or trafficker).
Children who appear to be unaccompanied are asking for food, drinks or money.	Exchange of cash between an adult and a child (exchange may raise suspicion of transfer of remuneration for services).
Children appear anxious, nervous and avoid eye contact.	The child does not have an identity document and appears to be under the control of an adult.
The adult behaves in a sexually charged manner towards the child - this is not a natural and caring relationship.	An adult gives a child alcohol.
During the stay, the adult and child do not come to the room for breakfast.	

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FURNITURE SERVICE

'Do not disturb' sign constantly visible on the door of the room where the children are staying.	No agreement to clean the room throughout the guest's stay.
Lots of notes/cash spotted in the room (may indicate illegal payments).	Children left unattended for long periods of time in the room or not leaving the room at all (e.g. food is brought to them).
Spotted in the room in large numbers were computers, mobile phones, card readers and other items.	An adult and children do not often leave the room, hardly at all, or only at times when few guests move around the hotel.
There are children's clothes or toys in the room, even though the child has not been registered at the facility.	Adults who are not guests of the facility stay in the lobby, seem to observe the area and interact with a guest of the facility who has arrived with a child.
Noticed large amounts of alcohol or drugs in a room where an adult has registered with a child.	In a room where an adult has registered with a child/children, there are condoms etc. left in the room or in the bathroom.

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Appendix 2: Example of an adult and child interview scheme during identification

When speaking to an adult, it is important to remain calm, polite and patient. At the start of the conversation, it is helpful to inform the adult that the NAT facility has child protection procedures in place and therefore a member of staff may ask additional questions to verify the child's details. There may be occasions when the adult feels uncomfortable, expresses opposition or displeasure. This does NOT necessarily mean that she is a potential offender.

Example of a conversation with a visitor:

"Our facility has child protection procedures in place, therefore, we ask that you present identification documents of all persons who are guests of the facility at the time of registration. Does the child have identification with them?" (ID card, passport, other).

If the child does not have the document or, after checking it, is not sure that the adult is the child's legal guardian, we can ask the following questions to help determine the situations:

- > What is the child's name, how old is he or she?
- > Are you the child's legal guardian? or Is the child related to you?
- > Do you have a certificate from the child's guardians that the child is in your care?
- > Do you have a telephone number for the child's carers so that we can confirm this?
- > For what purpose do you travel with your child?

Example of a conversation with a child:

- > What is your name, how old are you? Where do you live?
- > Who is the person you came/are staying/traveling with?
- > Do you know this gentleman/ lady well?
- > Where are your parents? We would like to contact them - do you have a phone number for them?

If the adult answers the questions for the child, we inform them that we want to talk to the child. If the adult makes it difficult to contact the child, we can emphasise that in a situation where it is impossible to identify the child, we will have to notify the police.



Appendix 3: Principles for a safe worker-child relationship

1. All employees of the [Facility/Hotel/Network], including other adults who come into contact with children on the premises, if such contact is with the permission of the facility, are required to comply with the following rules.
2. The guiding principle of all actions taken by staff who come into contact with children on the [Facility/Hotel/Network] is to treat the child with respect and take into account their dignity and needs.
3. It is unacceptable for staff and other adults to use violence in any form against a child.
4. Attention should be paid to the routine activities associated with visitor services and the operational activities of the facility:
 - in the event of a malfunction in the room during the guests' stay (the child may be in the room, but there is always a parent/guardian with him/her).
 - in the event of service being performed in the room during the guests' stay (the child may be in the room, but there is always a parent/guardian with him/her).
 - while the meal is being served in the dining room (the minor is accompanied by a parent/guardian).
 - during physiotherapy treatment (the minor is handed over for treatment by a parent/guardian)

Behaviours and practices expected of employees

- Be patient and respectful in your communication with any child.
- Listen carefully to the child and give answers that are appropriate to their age and the situation at hand. When communicating with the child, try to keep your face at the level of the child's face.
- Assure each child that if they feel uncomfortable with a situation, they can tell you or another designated person and get help.
- Inform the child where the SOMs are located in the facility in a version he or she understands. Assure him/her that if he/she has questions, he/she can approach you or another designated person.
- Respect the equal treatment of children regardless of their gender, sexual orientation, ability/disability, social status, ethnicity, culture, religion and belief.
- Ensure a safe space. If there are children in the area where you are working, make sure that equipment and supplies are used as intended and that the environment is safe (pay attention to window and stair protection, limited access to busy roads, open water, etc.).
- If you see a child/children left unattended and the situation may indicate a risk to the child's safety, take action to find the parent/guardian.



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Unacceptable behaviour and practices by staff towards children in the facility

- You must not shout, shame, humiliate, disrespect or insult any child.
- You must not hit, poke, push or in any way violate a child's physical integrity unless there is a threat to the child's health or life.
- You must not enter into any romantic or sexual relationship with any child or make inappropriate proposals to them. This includes sexually explicit comments, jokes, gestures and sharing erotic or pornographic content with any child in whatever form.
- You are not allowed to record the image of a child for private or business purposes (recording, photographing) without the consent of the child's parents/guardians and the consent of the child himself. This also applies to allowing third parties to record images of children. The exception is if the image of the child is only a detail of a whole, such as a gathering, landscape, public event, in which case the consent of the child's parent/guardian is not required.
- You must not make contact with any child through private communication channels (private phone, email, instant messaging, social media profiles) or meet any child outside the workplace.
- You must not offer any child alcohol, tobacco products or illegal substances.
- Never touch a child if he or she does not want you to or in a way that could be considered indecent or inappropriate.

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Appendix 4: Statement on the caregiver-child relationship

name of guardian/parent

residence address

DECLARATION BY THE GUARDIAN/PARENT

I declare that the person named:.....

born.....

is for me.....

for whom I have the consent of a legal guardian/parent to stay in the facility.

I declare that I am aware of the criminal liability for making a false declaration.

....., on.....

Place and date of declaration

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Type of personal data of the minor collected during identification

1. During the identification of the Minor, the processing of the child's personal data takes place with regard to the information contained in the documents presented and provided by the Guest of the facility or the telephone caller.
2. The employee may record and store the following personal data of the Minor:
 - a. Name,
 - b. age or date of birth,
 - c. PESEL number,
 - d. address of residence,
 - e. data of parents/legal guardians,
 - f. relationship to the hotel guest.
3. The processing of the Minor's data should not go beyond the identification data indicated above if the processing occurs solely for the purpose of identifying and ensuring the Minor's safety.

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