

STANDARDS FOR THE PROTECTION OF MINORS

1) PREAMBLE

- I. Taking into account the provisions of the Act of 28 July 2023 amending the Family and Guardianship Code and certain other acts, including amendments to the Act of 13 May 2016 on counteracting threats of sexual offences and protecting minors, as amended from time to time, and Regulation (EU) 2016/679 (GDPR) with respect to personal data processed under these Standards, and acting to ensure respect for the rights of minors, particularly their dignity and freedom from all forms of harm, Radisson Hotels Poland sp. z o.o., based in Warsaw (00-675), ul. Koszykowa 54, registered under Company Number 0001221896, operating the hotel Prize by Radisson, Wrocław Sky Tower, located at ul. Szczęśliwa 33, 53-445 Wrocław, Poland (hereinafter referred to as the "Hotel"), adopts this document as a set of rules, standards, and procedures adapted to the nature and type of services provided by the Hotel in cases where there is suspicion that a minor staying at the Hotel is being harmed, as well as to prevent such risks, hereinafter referred to as the "Standards".
- II. The complete version of the Standards shall be made available on the Hotel's website and displayed in a visible location at the Hotel, including at or near reception. A separate shortened version, prepared in language understandable to minors, shall be made available in a visible and accessible location at the Hotel and through the Hotel's website.

2) PRELIMINARY INFORMATION:

- I. These standards specify:
 - a) rules ensuring safe relationships between staff and minors, including prohibited behaviour toward minors;
 - b) procedures for identifying minors staying in the hotel and verifying their relationship with accompanying adults;
 - c) procedures for responding when there is a justified suspicion that a minor's welfare is at risk;
 - d) procedures and responsible persons for reporting suspected crimes and notifying the guardianship court or other competent authorities where appropriate;
 - e) the scope of responsibilities of the person responsible for training staff and documenting such training;
 - f) rules for processing personal data collected under these Standards; and
 - g) procedures for making the Standards available to staff, cooperating persons, minors, and their parents or legal guardians.
- II. A minor is any person under 18 years of age.
- III. Harm to a minor means any intentional or unintentional act or omission by an adult or another minor that may negatively affect the minor's physical, psychological, emotional, or sexual development or welfare, including exposing the minor to such acts.
- IV. A hotel employee is any person working at the Hotel, regardless of the legal basis of employment or cooperation (employment contract, contract of mandate, contract for specific work, internship, or temporary staffing agency). For the purposes of these Standards, "staff" also includes cooperating persons and contractors whose duties may bring them into contact with minors.
- V. The Hotel shall designate a Minor Safeguarding Coordinator responsible for day-to-day oversight of these Standards. The Coordinator's name or role and the applicable contact details shall be communicated to staff. In the Coordinator's absence, responsibilities shall pass to the most senior level employee on duty at the time.
- VI. The Hotel shall designate a person responsible for ensuring that the Standards are applied, reviewed, updated, and made available. This may be the Child Safeguarding Coordinator or another person designated by the Hotel Director. The Hotel may obtain administrative, legal, or compliance support from the Hotel's area support office or another group function.

3) PRINCIPLES FOR ENSURING SAFE RELATIONSHIPS

- I. The Hotel ensures that staff interacting with minors understand their responsibilities and maintain safe relations.
- II. Every guest, including minors, must be treated with respect and dignity.
- III. Contact between staff and minors must not exceed professional duties.
- IV. All forms of violence are prohibited, including physical, psychological, verbal abuse, and violation of bodily integrity.
- V. Types of prohibited harm include:
 - a) Physical violence (e.g. pushing, hitting, kicking)
 - b) Psychological violence (e.g. humiliation, insults, ridicule)
 - c) Sexual exploitation (e.g. violating intimacy, involving the minor in explicit materials)
 - d) Neglect (e.g. failure to meet basic physical or emotional needs)
 - e) Discrimination, harassment, bullying, or other conduct that threatens the minor's safety or dignity
- VI. Staff must not be alone with minors in Hotel rooms or bathrooms except where this is reasonably necessary to protect the minor's safety, provide emergency assistance, administer first aid, respond to a security incident, or perform another legitimate professional duty. Where practicable, a second staff member or supervisor should be informed before or as soon as possible after the contact. The reason and circumstances shall be recorded where the contact is connected with a safeguarding incident or concern.
- VII. If temporary supervision is needed, it should occur in public areas and, where possible, be performed by two staff members rather than one. This requirement does not prevent staff from entering a private area where necessary to protect a minor or respond to an emergency.
- VIII. Inappropriate, overly familiar, or ambiguous behaviour is prohibited. Staff must not take personal photographs or recordings of minors or use photographs or recordings of minors for personal purposes. Official Hotel photography or filming may take place only in accordance with the Hotel's privacy, image-rights, and consent procedures.
- IX. As a general rule, contact with minors must occur only during working hours and in public spaces. Exceptions may apply where contact is necessary in an emergency or to protect the minor, provided that the contact is limited to what is necessary and is reported in accordance with these Standards.
- X. The Hotel commits to training staff to recognize signs of harm and respond appropriately.
- XI. Every Hotel employee and relevant cooperating person shall be provided with access to these Standards before undertaking duties that may bring them into contact with minors
- XII. Staff must not threaten, intimidate, bully, assault, sexually harass, exploit, or otherwise harm another minor on the Hotel's premises. Where such conduct may threaten a minor's welfare, staff must inform a supervisor or the Minor Safeguarding Coordinator and take proportionate steps to ensure safety.

4) IDENTIFICATION OF MINORS AND THEIR RELATIONSHIPS

- I. Staff must take reasonable and proportionate steps to identify minors and their relationship with accompanying adults. Guests must be informed about the reason for such checks. Proper identification is key to protecting minors from harm.
- II. Staff should:
 - a) Request identity documents (ID card, passport, school ID, birth certificate)
 - b) Ask additional questions if necessary
 - c) request information or documentation reasonably necessary to establish whether the accompanying adult is a parent, legal guardian, or another person authorised to care for the minor.
- III. A difference in surnames may justify additional proportionate questions or a request for supporting documentation, but it shall not, by itself, establish that the adult is unauthorised or that abuse has occurred.
- IV. If the accompanying adult is not the minor's parent or legal guardian, the Hotel may request a document confirming the adult's authority to care for the minor, such as parental consent, a court decision, or another reliable document. The form and scope of verification shall be proportionate to the circumstances.
- V. If the adult refuses reasonable verification, gives inconsistent information, or the circumstances otherwise give rise to a safeguarding concern, the Reception Manager, Hotel Director, Minor Safeguarding Coordinator, or most senior employee on duty must be informed.

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- VI. The minor may be gently asked questions without causing discomfort, in a manner appropriate to the minor's age, and never in a way that suggests the minor is at fault or under suspicion. If doubts persist, and the circumstances indicate a risk to the minor's safety or welfare, then the Police must be notified. Both the minor and adult must remain under observation, discreetly and without alarming the minor, without interrogation or conduct that may alarm or stigmatise the minor.
- VII. All departments, including housekeeping, restaurant, and security, must report suspicious situations immediately to a supervisor, the Child Safeguarding Coordinator, the Hotel Director, or the most senior employee on duty, using the applicable internal reporting or emergency escalation procedure.
- VIII. Staff must not conduct an investigation or repeatedly question the minor. Information should be collected only to the extent necessary to protect the minor and make an appropriate report.
- IX. The Hotel shall record only the personal data necessary to document the verification and respond to a safeguarding concern. Copies of identity documents or authorisation documents shall not be made or retained unless objectively necessary for a specified legal, evidential, or operational purpose and permitted under the Hotel's data-protection framework.
- X. Personal data collected under this Section shall be accessible only to authorised persons, retained only for the period necessary for the relevant purpose or applicable legal obligation, and securely deleted or destroyed when no longer required. The Hotel's privacy notice and records-retention schedule shall apply.

5) RESPONSE TO SUSPECTED RISK

- I. Staff must immediately inform a supervisor, the Child Safeguarding Coordinator, or the Hotel Director and/or call 112 where immediate intervention is required. A safeguarding concern exists where:
 - a) The minor reports harm
 - b) Staff observes harm
 - c) Signs of abuse are visible or inconsistent explanations are given
- II. The minor must be protected and supervised until the Police or another competent service arrives. Where practicable, a second staff member should be present. The person supervising the minor should be appropriately trained and selected having regard to the minor's safety, wishes, privacy, accessibility needs, and the circumstances. The minor must never be left alone with a person suspected of causing harm. Staff must not use physical force or otherwise detain a person except where permitted by law. Any intervention must be necessary and proportionate, and the police must be contacted immediately where force is used or a person is detained.
- III. The minor should be supervised by an appropriate trained staff member, taking into account the minor's safety, wishes, privacy, any accessibility needs, and the availability of staff. Where practicable, a second staff member should be present.
- IV. Evidence (e.g. CCTV recordings) must be secured, and access to it restricted to the Director and, where relevant, the Police. The incident must be documented in writing, including date, time, persons involved, actions taken, and by whom, and stored securely and confidentially, separate from general hotel records. Staff should avoid giving instructions that could interfere with evidence preservation and should follow instructions from the Police or medical personnel. The minor's immediate health, safety, comfort, and medical needs take priority.
- V. Throughout this process, staff must avoid discussing the incident with other guests or on social media, to protect the minor's privacy and dignity. Information may be shared internally only on a need-to-know basis and with the police, medical personnel, social services, guardianship court, or other competent authorities where legally permitted or required.
- VI. Where it is safe and appropriate, the Hotel shall support the minor in contacting a parent or legal guardian. Such contact must not be made where it could increase the risk to the minor or where the accompanying adult may be the suspected perpetrator.
- VII. After the incident, the Hotel shall take reasonable steps to ensure the minor's continued safety until responsibility is assumed by the parent, legal guardian, Police, medical personnel, social services, or another competent authority

6) REPORTING PROCEDURES

- I. The Hotel Director or designated responsible person shall ensure that the Police or another competent authority is notified without undue delay where the circumstances indicate a suspected offence or an immediate risk to the minor. In an emergency, any employee may and should call 112 immediately without waiting for the Director's authorisation.
- II. The Director may notify the guardianship court if necessary, particularly in cases not constituting a crime but indicating risk to the minor's welfare (e.g. neglect).
- III. The Director is formally designated as responsible for such reports. This designation does not prevent any employee from making a report directly where immediate action is required or where waiting may endanger the minor.
- IV. No employee who, in good faith, reports a suspicion of harm to a minor will face retaliation, disciplinary action, or adverse employment consequences as a result of that report, even if the suspicion is later found to be unfounded.
- V. Records shall be retained for the period necessary to document compliance, manage legal claims, cooperate with competent authorities, and meet applicable statutory obligations, in accordance with the Hotel's retention schedule and GDPR requirements. Records connected with an investigation or claim shall be retained for as long as legally necessary. Reports and incident records shall be stored with restricted access. Access shall be limited to persons who require the information for safeguarding, legal, compliance, employment, insurance, or law-enforcement purposes.

7) STAFF TRAINING

- I. The Director is responsible for staff training, including:
 - a) Reporting suspicious situations
 - b) Communicating with minors
 - c) Understanding prohibited behaviours
 - d) Protecting the minor's privacy and personal data
 - e) Responding to emergencies and cooperating with the Police and other competent authorities
 - f) The limits of staff authority, including the limits of detention and use of force.
- II. Training occurs on a regular basis, and additionally for all new employees before they begin independent work involving guest contact. Staff can also improve skills via HR-led training programs. Staff shall be informed where the current version of the Standards can be accessed.
- III. Standards are reviewed at least every two years, or sooner if required by changes in applicable law. Conclusions from such reviews shall be documented in writing.

8) EMPLOYMENT OF STAFF WORKING WITH MINORS

- I. Before admitting a person to activities involving care, education, upbringing, leisure, treatment, or other activities falling within the statutory scope of the Act, the Hotel shall carry out the checks required by law. Depending on the person's circumstances, these may include:
 - a) Checking sex offender registers (Rejestr Sprawców Przepęstw na Tle Seksualnym)
 - b) Checking criminal records
 - c) Collecting residency declarations (where required by applicable law)
 - d) Verifying foreign records if applicable
- II. The Hotel may conduct periodic or event-driven re-verification where justified by the role, applicable law, or the Hotel's risk-based compliance policy. Verification shall be carried out before assigning a person to duties falling within the statutory scope of the Act. The Hotel shall separately ensure that all personnel receive appropriate instruction on the Standards where their work may bring them into contact with minors.
- III. Staff whose duties do not fall within the statutory screening requirements shall nevertheless receive appropriate instruction on these Standards where their work may bring them into contact with minors.

9) FINAL PROVISIONS

- I. These Standards enter into force on the date of adoption and apply to all Hotel employees and cooperating persons to the extent relevant to their duties at or for the Hotel.
- II. In matters not regulated herein, applicable Polish law, including the Act of 13 May 2016 and the Family and Guardianship Code, shall apply.
- III. The Hotel shall make the complete and shortened versions of the Standards available in accordance with clause 1.2.