



STANDARDS FOR THE PROTECTION OF MINORS
AT CENTRUM ZDROWIA I WYPOCZYNKU IKAR SP. Z O. O.
THE IKAR FACILITY

1. DEFINITIONS

For the purposes of this document, the following terms shall have the following meaning:

- a) A child is any person under 18, including children with disabilities and children with special educational needs.
- b) An adult stranger is any person over 18 who is not a parent or legal guardian of the child.
- c) Harming a child means committing an offence to the detriment of a child.
- d) Offence to the detriment of a child – all offences that may be committed against adults that may be committed to the detriment of children and additionally offences that may only be committed against children (e.g. sexual abuse under Article 200 of the Polish Criminal Code). Due to the specific nature of tourist facilities allowing for an easy opportunity of isolation, the most likely offences committed on their premises will be the following offences: against freedom (Article 189, Article 189(a) and Article 191(a) of the Polish Criminal Code), against sexual freedom and morality, in particular rape (Article 197 of the Polish Criminal Code), sexual exploitation of insanity and helplessness (Article 198 of the Polish Criminal Code), sexual exploitation of dependency or critical situation (Article 199 of the Polish Criminal Code), sexual exploitation of a person under 15 (Article 200 of the Polish Criminal Code), grooming (seducing a minor using distance communication measures – Article 200(a) of the Polish Criminal Code) as well as offences concerning violation of bodily integrity (Article 217 of the Polish Criminal Code).

2. PREAMBLE

Having due regard to the regulations included in the Polish Act on Counteracting Threats of Sexual Offences of 13 May 2016 (Polish Journal of Laws of 2023, item 1304, as amended) and the substance of the United Nations guidelines on business and human rights, recognising the important role of business in ensuring respect for children's rights, in particular the right to protect their dignity and freedom from all forms of harm, Centrum Zdrowia i Wypoczynku IKAR, 78-100 Kołobrzeg, ul. Rodziewiczówny 24, hereinafter referred to as the IKAR has developed this document consisting of rules and procedures to be applied when a child staying at IKAR is suspected of being harmed. This document is also aimed at preventing any threats to children. Child protection policy in our facility shall be implemented through the following principles:

- a) IKAR conducts its operations with the utmost respect for human rights, in particular the rights of children as persons particularly exposed to being harmed.
- b) IKAR, owned by Centrum Zdrowia i Wypoczynku Sp. z o. o., 78-100 Kołobrzeg, ul. Rodziewiczówny 24, NIP (Polish Tax Identification Number) 671-15-62-089, REGON (Polish Business Identification Number) 330921693 recognises its role in conducting socially responsible business and promoting desirable social attitudes.





- c) IKAR puts a particular emphasis on the importance of legal and social obligation to notify law enforcement agencies of any suspected offence committed to the detriment of children and undertakes to train its personnel in this respect.
- d) IKAR undertakes to educate its personnel on circumstances indicating that a child staying in the facility may be harmed and on manners of quick and appropriate response to such situations.
- e) One of the forms of effectively preventing child abuse is the identification of a child staying in the facility and their relationship with the adult they are staying in the facility. Personnel shall take all necessary steps to identify the child and their relationship with the adult they are staying in the facility, based on procedures, clearly defined rules and good practices.

3. RULES ENSURING SAFE RELATIONSHIP BETWEEN THE IKAR PERSONNEL AND MINORS, IN PARTICULAR UNLAWFUL BEHAVIOUR TOWARDS MINORS

- a) All persons working with children shall be safe for them, which means, among other things, that their employment background indicates harming no children in the past.
- b) Each person employed by Centrum Zdrowia i Wypoczynku IKAR Sp. z o. o. for work related to education, recreation and child care, including persons employed under a contract of employment, civil law contract, as an apprentice, a trainee or volunteer, regardless of citizenship and age shall be verified in the Sex Offenders Register (<https://rps.ms.gov.pl/>). Each time, prior to signing the contract by the employee delegated to the above activities, the Human Resources Department shall verify their data in the register. The verification printout shall be attached to the files of the person concerned.
- c) All employees employed to work with children shall submit a statement of no criminal record and no proceedings pending against them for acts committed against children.
- d) For services provided by external entities, the contracts with such entities shall be supplemented with an annex including a statement to obtain the consent of their employees, which will allow IKAR to enforce the appropriate standard requiring such entities to check their employees for their safety for children. Such a provision should assume controlling the fulfilment of the obligation, e.g. under the penalty of immediate termination of the contract and imposing a contractual penalty. Each person employed by the subcontractor and working with children shall produce a printout from the Sex Offenders Register.



4. RULES AND PROCEDURES FOR IDENTIFYING MINORS STAYING IN THE IKAR FACILITY AND THEIR RELATIONSHIP WITH ADULTS THEY STAY IN THE FACILITY

If the reservation indicates a child's stay, the receptionist shall check in all the persons staying in the room with the child by filling in individual registration cards. The person who is the child's guardian shall complete the child's data and specify the degree of relationship on the registration card. If the child's guardian is not the legal guardian, the receptionist shall not check in the guests until they have had the degree of relationship clarified or have received consent for the child's stay from the child's legal guardian. The receptionist shall promptly notify their immediate superior of the situation. It should be noted that grandparents, with parents vested with full parental rights, are not legal guardians under the Polish Family and Guardianship Code and they are required to have written consent of the child's parents concerning the above situation, unless the relationship is obvious and the child's behaviour raises no doubts.

5. RULES AND PROCEDURES OF RESPONDING TO REASONABLE SUSPICION OF MINORS' WELL-BEING AT RISK IN THE IKAR FACILITY

Each employee having a reasonable suspicion that a child staying at IKAR is being harmed shall notify their immediate superior, who decides on the personal response and contact with the police depending on the nature and circumstances of the situation concerned. A reasonable suspicion of child abuse occurs when:

- a) The child has disclosed the abuse to the facility employee.
 - b) The employee has observed the abuse.
 - c) The child has visible signs of abuse (e.g. scratches, bruises), and when approached, the child responds incoherently and/or chaotically and/or becomes embarrassed or there are other circumstances that may indicate abuse, e.g. revealing pornographic materials involving children in an adult's room.
 - d) There are disturbing sounds of abuse/possible abuse or child abuse coming from the hotel room.
 - e) Disturbing behaviour of an adult towards the child has been observed (also using CCTV).
- In the event of tension escalation between an adult suspected of harming a child or having unclear relationship with a child, the overriding concern shall be:

- a) To ensure your safety.
- b) To ensure the child's safety.
- c) To notify the appropriate patrol.
- d) To reduce tension and conduct a calm conversation.





6. CODE OF CONDUCT FOR THE IKAR PERSONNEL TO ADDRESS VIOLENCE TOWARDS CHILDREN WITH DISABILITIES OR CHILDREN WITH SPECIAL EDUCATIONAL NEEDS

- a) IKAR undertakes to regularly educate its personnel on the conduct involving children with disabilities or children with special educational needs.
- b) As part of training, personnel shall learn the code of conduct involving children with disabilities whose behaviour may indicate experiencing violence from their parent/guardian.
- c) Recognising symptoms of abuse of minor hotel guests with disabilities is an extremely difficult task. Personnel usually do not have knowledge of the nature of disability of a minor guest, the behaviour pattern characteristic for a person with a given disability and the nature of their relationship with their parent/guardian. A significant factor preventing the identification of symptoms that may indicate that a child is being harmed is the time the employee approaches the minor while performing their tasks.
- d) However, as part of the tasks performed, also involving minors with no disabilities, the IKAR personnel shall pay special attention to:
- visible bodily injuries (bruises, burns, bites, etc.), the origin of which is difficult to explain, the injuries being healed at different rates,
 - unreliable, inconsistent explanations given by the child related to injuries,
 - anxiety visible during the child's contacts with the parent/guardian or another adult, phobias,
 - somatic disorders (stomach-aches, headaches, vomiting, nausea),
 - isolating from other people, especially parents/guardians,
 - symptoms of depression, self-harm, suicidal thoughts,
 - unconvincing or contradictory information or refusal to explain the cause of child's injuries by the parent/guardian,
 - constant humiliation, insulting the child by the parent/guardian, verbal abuse of the child,
 - exceeding normal parent/guardian-child boundaries in physical contact with the child,
 - parent/guardian distorted perception of reality, e.g. incorrect reaction to the situation, incoherent communication and other disturbing, unusual behaviours.
- e) The IKAR employee who, while performing their duties, observes disturbing behaviours in relation to the child and/or their parent/guardian, shall promptly report such behaviours to their immediate superior.



7. PROCEDURES AND PERSONS RESPONSIBLE FOR NOTIFYING OF SUSPECTED OFFENCE INVOLVING MINORS AND NOTIFYING THE GUARDIANSHIP COURT

In each case there is a suspicion of an offence or when an offence has been committed, the IKAR Management shall cooperate with law enforcement agencies and provide appropriate notifications.

For situations not described in this document, each employee shall consider their safety, child's well-being and other good practices.

8. SCOPE OF COMPETENCE OF THE PERSON RESPONSIBLE FOR THE IKAR PERSONNEL PREPARATION TO APPLY STANDARDS. RULES FOR PERSONNEL PREPARATION AND METHOD OF DOCUMENTING THIS ACTIVITY

The procedures have been approved by the Standards for the Protection of Minors Coordinator. The name, surname and data of the Coordinator are available to entities controlling IKAR.

The persons responsible for implementing and complying with this procedure are: Director of Centrum Zdrowia i Wypoczynku IKAR Sp. z o. o. and Department Managers at IKAR.

- Employees employed under a contract of employment, civil law contract sign an acknowledgement of the Standards for the Protection of Minors applicable at IKAR.
- Persons supervising subcontractors' employees shall further provide information on the scope of this procedure.

9. CYCLICAL AUDIT OF SAFETY STANDARDS IN PLACE

Assessment of safety standards in place and their revision to applicable legal regulations will be carried out on a cyclical basis at least once every two years by the Centrum Zdrowia i Wypoczynku IKAR Sp. z o. o. Management.

10. HOTEL MARKING

Information on the standards applicable at IKAR regarding child protection is available at the IKAR reception and on website: www.ikar-centrum.pl.





II. SAMPLE TEMPLATE OF CONSENT FOR A CHILD STAY WITH A PERSON NOT BEING A PARENT OR LEGAL GUARDIAN

(place), (date)

CHILD CARE AUTHORISATION

I

(name and surname of parent/legal guardian)

residing in.....

(address of parent/legal guardian)

holder of identity card

(number)

being a parent/legal guardian, having the right to take care of:

.....

(name and surname of child)

.....

(the child's document number)

residing in

(child's address)

hereby grant hereby grant Mrs./Ms./.....

(name, surname and address of the authorised person)

holder of identity card

(number)

the authority to take care of and handle current and emergency matters related to the care of the above-described child during their stay at Centrum Zdrowia i Wypoczynku IKAR,

78-100 Kołobrzeg, ul. Rodziewiczówny 24, in the following period

I am aware of criminal liability for making any false statement under Article 233(6) of the Polish Criminal Code Act of 6 June 1997 (Article 233 of the Polish Criminal Code).

.....

(signature of parent/legal guardian)