

# STANDARDS FOR THE PROTECTION OF MINORS

## AT KLICKÓW CASTLE, PRINCE'S FARMSTEAD

### PREAMBLE

Considering:

1. The obligation arising from the Act of May 13, 2016, on the Prevention of Sexual Crime and Protection of Minors (Journal of Laws 2024, item 560).
2. The content of the United Nations guidelines on business and human rights, recognizing the significant role of business in ensuring respect for the rights of minors.

Kliczków Castle and Prince's Farmstead adopt the Standards for the Protection of Minors for application.

The Standards for the Protection of Minors at the Kliczków Castle and Prince's Farmstead are implemented based on the following principles:

1. The management of the aforementioned facilities conducts its operational activities with respect for the rights of minors, who, due to their age, emotional, and mental state, are particularly vulnerable to harm.
2. The management of the aforementioned facilities acknowledges its role in conducting socially responsible business and promoting desirable social attitudes.
3. The management of the aforementioned facilities recognizes the legal and social obligation to notify law enforcement agencies of any case of harm, suspicion of a crime against a minor, and commits to training its employees to possess the competencies to fulfill this obligation.

### I. Glossary

For the purposes of this document, the following terms are defined as:

1. *Kliczków Castle, Prince's Farmstead* – refers to the company Zamek Kliczków Sp. z o.o., with its registered office in Kliczków, registered in the business register of the National Court Register under number 0000161303; Zamek Kliczków Sp. z o.o., Kliczków 8, 59-724 Osiecznica.
2. *Hotel* – refers to the properties: Kliczków Castle, Prince's Farmstead in Kliczków.
3. *Hotel Director* – the person managing the Hotel on behalf of Zamek Kliczków Sp. z o.o. and Prince's Farmstead.
4. *Hotel Employee* – any person who is part of the Hotel staff, regardless of the legal basis for their work.
5. *Minor* – any person under 18 years of age.
6. *Child's Guardian* – the legal representative of the child: parent, guardian, foster parent, temporary guardian.
7. *Stranger Adult* – any person over 18 years old who is not the minor's guardian as understood by point 6.
8. *Child Abuse* – any behavior towards a child that constitutes a prohibited act against them. Additionally, child abuse includes neglect, omission, as well as its result in

violating the rights, freedoms, personal goods of the minor, and disrupting their development. The basic forms of abuse include:

a) Physical violence against the child b) Psychological violence against the child c) Sexual violence against the child d) Child neglect e) Peer violence (verbal violence, relational violence, physical violence, material violence, cyber violence, sexual exploitation)

## **II. Preliminary Provisions**

1. At every stage of applying the procedures resulting from the Standards, it must be remembered that they may be an inconvenience for hotel guests. Therefore, understanding for the reactions of Guests to the above should be shown, and the actual and legal necessity of conducting these procedures in the Hotel should be explained to them. However, a Guest's reaction cannot be a reason to deviate from the procedures.
2. All procedures provided by the Standards should be applied with proportionality to the situation and in a reasonable manner.
3. Hotel Employees should consider the emotional and intellectual development of minors in their interactions, and if the minor is disabled or has special educational needs, this circumstance should also be considered.

## **III. Rules ensuring safe relationships between Hotel Employees and minors, especially prohibited behaviors towards minors**

1. The Hotel will strive to ensure that its employees who may come into contact with minors staying at the Hotel are aware of their obligations in this regard, and are able to ensure safe relationships between them and the minors.
2. A Hotel Employee should not allow a situation where they remain alone with a minor in a room at the Hotel, except when leaving the minor alone in the room could significantly endanger their well-being, particularly their health or life. Where possible, the presence of another adult, monitoring cameras, or planning duties in such a way that the situation can be revisited after it has passed should be ensured.
3. Any contact between a Hotel Employee and minors staying at the Hotel should not go beyond interactions justified by the Hotel Employee's duties.

## **IV. Rules and procedures for identifying a minor staying at the Hotel and their relationship with the adult accompanying them**

1. Identification of the minor and their relationship with the adult staying at the Hotel is carried out by hotel reception staff. Such identification is based on the documents of the minor and the accompanying adult, and in their absence, based on a conversation with the adult and the minor. If the adult is not the minor's parent or legal guardian, the adult should be asked for consent from the parent or legal guardian for the minor to stay under their care. In the absence of such a document, the adult must complete a relevant declaration.
2. The parent/guardian of the child/stranger fills out a statement during check-in at the Hotel, containing the child's and the adult's details, and indicating the relationship between the minor and the adult. The receptionist is obliged to register all persons staying in the room(s) – adults and minors.
3. If during the procedure described in section 1, the reception staff have any doubts about the relationship between the minor and the adult, they should discreetly inform the Hotel

Director or the Hotel Operations Director. The minor and the adult should remain under the observation of Hotel Employees during this time.

4. During a conversation with the minor, special attention should be paid to ensure the minor can express themselves freely and without restraint, particularly that the adult accompanying the minor in the Hotel does not answer questions directed at the minor. If the adult in any way hinders contact with the minor or exerts pressure on them, even just by their presence, the adult should be asked to leave the room during the conversation with the minor, and a second Hotel Employee should be asked to be present during the conversation.

## **V. Rules and procedures for responding in case of a justified suspicion that the well-being of a minor staying at the Hotel is at risk**

1. If there is a justified suspicion that the well-being of a minor staying at the Hotel is at risk, every Hotel Employee is obliged to respond to the situation by taking appropriate actions.
2. A justified suspicion of child abuse occurs especially when a Hotel Employee observes circumstances that may indicate child abuse, when the minor bears marks that may suggest abuse, or when the minor themselves reports abuse.
3. The actions mentioned in section 1 should involve immediately notifying the Hotel Director, Hotel Operations Director, or if this is not possible or could cause unnecessary delay, informing the supervisor or the police.
4. If a Hotel Employee can be expected to do so in a given situation, they may also take direct actions to stop the abuse, considering, however, that such an attempt should not endanger the safety of themselves, the minor, or bystanders. A bystander in this provision does not include the perpetrator or accomplice of the abuse. The actions of the Hotel Employee should remain within the bounds of the law, particularly adhering to the principles regulating the issue of necessary defense or the so-called citizen's arrest.

## **VI. Procedures and persons responsible for notifying the suspicion of a crime against a minor and informing the guardianship court**

1. After being notified by Hotel Employees in situations provided for in these Standards, the Hotel Director or Hotel Operations Director is obliged to determine the state of affairs and, if the established circumstances justify such a step, to notify the police.
2. In urgent situations, any Hotel Employee is authorized and obliged to notify the police.
3. After notifying the police, Hotel Employees should ensure that the minor and the adult who may have committed a crime do not leave the Hotel before the arrival of police officers and that potential evidence of the crime is not destroyed (e.g., securing footage from monitoring cameras).
4. In justified cases, the Hotel Director is also obliged to consider the possibility of notifying the guardianship court (the so-called notification within the framework of the civic duty).

## **VII. The scope of competence of the person responsible for preparing Hotel Employees to apply the Standards for the Protection of Minors, the rules for preparing these Employees to apply them, and the method of documenting this activity**

1. The persons responsible for preparing Hotel Employees to apply the Standards are the Hotel Director and the Hotel Operations Director.
2. Hotel Employees will have the opportunity to increase their competencies related to the tasks resulting from the Standards for the Protection of Minors through training organized by the Hotel Management. Increasing competencies will be documented with tests concluding the training.

## **VIII. Final Provisions**

1. At least once every two years, the Standards for the Protection of Minors will be evaluated to ensure their adaptation to current needs and compliance with applicable regulations, and the conclusions from the evaluation will be documented in writing.
2. The Standards will be made available on the website [www.kliczkow.com.pl](http://www.kliczkow.com.pl) and will also be posted in a visible place in the hotel reception, in both a full version and an abridged version intended for minors.
3. The Standards come into force on August 15, 2024.