

PROCEDURE
FOR THE PROTECTION OF CHILDREN
IN THE HOTEL GOŁĘBIEWSKI CHAIN



Preamble

Being fully aware of the importance of the welfare of the children, this procedure is an expression of the commitment to promote and protect the rights and interests of children at Gołębiowski Holding Sp. z o.o. Ciemne, ul. Wołomińska 125, 05-250 Radzymin, NIP [Tax Identification Number]: 125-173-93-35, branch: Hotel Gołębiowski w Mikołajkach, ul. Mrągowska 34, 11-730 Mikołajki, mikolajki@golebiowski.pl

§1

1. Company – Gołębiowski Holding sp. z o.o. with its registered office in Ciemne at ul. Wołomińska 125, registered in the Register of Entrepreneurs maintained by the District Court for the Capital City of Warsaw in Warsaw, 14th Commercial Division of the National Court Register under the number 0000996308, NIP [Tax Identification Number]: 1251739335, REGON [National Business Register Number]: 523380176,
2. Hotel / Facility – a hotel facility belonging to Gołębiowski Holding Sp. z o.o.: Hotel Gołębiowski in Mikołajki, Hotel Gołębiowski in Wiśla, Hotel Gołębiowski in Karpacz, Hotel Gołębiowski in Białystok;
3. Minor – a person who is under 18 years of age or has not otherwise attained the age of majority (including through marriage);
4. Guest or Hotel Guest – an adult using the services of the Facility;
5. Adult stranger – is any person over the age of 18 who is not the child's parent or legal guardian.
6. DPO – Data Protection Officer of the Company;
7. Procedure – this document;
8. Regulation or GDPR – Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation);
9. Act – the Act of 13 May 2016 on counteracting the threat of sexual offences and the protection of minors (Journal of Laws 2023, 1304, as amended).
10. Harming a child for the purposes of this document means committing an offence against a child.
11. Offence against a child – all offences that can be committed against adults can be committed against children, plus offences that can only be committed against children (e.g. Sexual Exploitation under Article 200 of the Penal Code). Given the nature of hotels, where seclusion can easily be obtained, the offences most likely to occur on their premises will be offences against sexual freedom and morality, in particular rape (art. 197 of the Penal Code), sexual exploitation of insanity and helplessness (art. 198 of the Penal Code), sexual exploitation of dependence or critical position (art. 199 of the Penal Code), sexual exploitation of a person under 15 years of age (art. 200 of the Penal Code), grooming (seduction of a minor by means of remote communication – art. 200a of the Penal Code).
12. An employee hired to work with children that must be checked against the Sex Offender Register is any person hired to perform such duties, including a person

hired under a civil contract, an apprentice, an intern and a volunteer, regardless of the nationality and age of the person.

§2

1. This Procedure sets out:
 - a. principles ensuring a safe relationship between the staff of the facility and the minor, in particular the behaviour not allowed towards minors;
 - b. rules and procedures for the identification of the minor staying at the facility and their relationship to the adult with whom they are staying at that facility;
 - c. rules and procedures for reacting when there is a reasonable suspicion that the welfare of a minor staying at the tourist facility or enjoying tourist services is at risk;
 - d. procedures and persons responsible for reporting a suspected offence against a minor and notifying the guardianship court;
 - e. scope of competence of the person in charge of preparing the staff of the facility to apply the standards, the rules for preparing the staff to apply them and the way of documenting this activity.
2. All rules expressed in this document have been established in accordance with applicable law, including in particular the Act.
3. The procedure implements the standards referred to in Article 22c section 3 point 2 of the Act.
4. The procedure must be applied by all employees of Gołębiewski Hotels belonging to the Company, with particular consideration given to the employees who provide services to Guests.

§3

Information policy

1. Any staff member checking in or serving a Guest at the Facility is required to inform the Guest of the rationale for collecting information on Minors and the importance, in the context of global child safety, of taking measures to protect Minors.
2. With the above in mind, it is pointed out that:
 - a. legislation makes it compulsory to lay down rules and prepare procedures for the identification of Minors staying in hotel facilities. Thus they introduce as a standard of operation of hotel facilities – verification of personal data of a Minor and their relationship to the Hotel Guest,
 - b. from 15 February 2024, every hotel facility owned by the Company will identify Minors,
 - c. introducing rules for the identification of Minors serves to prevent child abuse
3. At Hotel Gołębiewski, a clearly visible plate is placed in a prominent spot – preferably by the reception desk or in close proximity to it – informing that the Hotel cares about the safety of children and has procedures in place to protect Minors from harm. The template of the plate is enclosed as Annex No. 1 to the Procedure.

4. Gołębiewski Hotels also place information about the introduction of standards on their websites and on the websites for booking rooms in Hotel Gołębiewski.

§4

Principles concerning safe relations of the Hotel Gołębiewski staff with children

1. Employees of the Facilities are required to exercise due diligence to ensure the safety of the Minor.
2. The guiding principle of all actions taken by staff is to act for the benefit of the child and in their best interests. Staff treat the child with respect and consider their dignity and needs. It is unacceptable to use violence against a child in any form.
3. In pursuing these objectives, staff act within the framework of the applicable law, the institutions' internal rules and their own competences. The principles of safe staff-child relationships apply to all employees, trainees and volunteers.
 - I. Relationship of staff with children
 - a. You are required to maintain a professional relationship with children and each time consider whether your response, message or action towards a child is appropriate to the situation, safe, reasonable and fair to other children.
 - b. Act in a way that is open and transparent to others to minimise the risk of your behaviour being misinterpreted.
 - II. Communication with children
 - a. Be patient and respectful when communicating with children.
 - b. Listen carefully to children and give them answers appropriate to their age and the situation at hand.
 - c. You must not embarrass, humiliate, disrespect or insult a child. You must not shout at a child in any situation other than those based on the safety of the child or other children.
 - d. You must not disclose sensitive information about the child to unauthorised persons, including other children. This includes the child's image, information about their family, economic, medical, guardianship and legal situation.
 - e. When making decisions about the child, let them know and try to take their expectations into account.
 - f. Respect the child's right to privacy. If it is necessary to waive confidentiality to protect the child, explain this to them as soon as possible.
 - g. If the need arises to speak to the child in private, leave the door to the room ajar and ensure that you are within sight of others. You can also ask another employee to be present during such a conversation.
 - h. You must not behave in an inappropriate manner in the presence of children. This includes using vulgar words, gestures and jokes, making offensive remarks, making references to sexual activity or attraction, and using a relationship of power or physical superiority (intimidation, coercion, threats) towards the child.

- i. Assure children that if they feel uncomfortable about a situation, a particular behaviour or words, they can tell you or the designated person (depending on the intervention procedures the institution has adopted) and can expect an appropriate response and/or assistance.
- III. Activities with children
 - a. Value and respect children's contributions to activities, actively involve them and treat them equally regardless of their gender, sexual orientation, ability/disability, social, ethnic, cultural, religious background and worldview.
 - b. Avoid favouritism towards children.
 - c. You must not enter into any romantic or sexual relationship with a child or make propositions of an inappropriate nature. This includes sexual comments, jokes, gestures and the sharing of erotic and pornographic content with children in whatever form.
 - d. You are not allowed to record a child's image (filming, voice recording, photographing) for private use. This also applies to allowing third parties to record images of children unless the management has been informed of, consented to and obtained the consent of the parents/legal guardians and the children themselves.
 - e. You must not offer alcohol, tobacco products or illegal substances to children or use them in the presence of children.
 - f. You must not accept money or gifts from the child or the child's parents/guardians. You must not enter into a relationship of any dependency with the child or the child's parents/guardians. You must not behave in a way that could suggest to others the existence of such a relationship and lead to accusations of unequal treatment or financial or other advantage.
- IV. Physical contact with children
 - a. Any violent action against a child is unacceptable.
 - b. You must not hit, poke, push or in any way violate the child's physical integrity.
 - c. Never touch a child in a way that could be considered indecent or inappropriate.
 - d. Always be prepared to explain your actions.
 - e. Physical contact with a child must never be covert or hidden, involve any kind of gratification or result from a power relationship. If you witness any of the behaviours and/or situations described above from other adults or children, always inform the person in charge and/or follow the procedure in place.
 - f. In situations involving caring for and hygiene activities with the child, avoid other than necessary physical contact with the child. This particularly applies to helping the child with dressing and undressing, eating, washing, changing and using the toilet. Ensure that you are assisted in each of the care and hygiene activities by another person from the institution.

§5

Responsibilities regarding identification

1. Hotel Gołębiewski employees shall take all possible steps to identify the Minor and their relationship with the Guest with whom they are staying at the Hotel.

2. Employees shall also provide explanations and inform Guests of the rationale for collecting such information.

§6

Identification of the Minor

1. The identification of the Minor and their relationship to the Guest shall be determined by the Reception employee by:
 - a. asking to see the Minor's identity card or other identification document or a document indicating kinship, e.g. Minor's birth certificate, school ID card, passport,
 - b. asking additional questions at the Guest's check-in at the Facility – if indicated and the information provided so far raises doubts of the Facility staff.
2. If the names of the Guest and the Minor do not coincide – the Guest is additionally asked to present a document that proves the relationship between the Guest and the Minor, such as the Minor's birth certificate, a document on the change of the parent's name, etc.
3. In case the Guest is not the parent/legal guardian of the Minor, the Guest is requested to present:
 - a. a court decision on the custody of the Minor,
 - b. consent signed by the child's parents or legal guardians, indicating the child's details, address of residence, telephone contact to the parent/guardian and the identity document number/PESEL of the person to whom the parent/guardian has entrusted custody of the child, or notarised consent of the parent to travel with the child.
4. If the Guest does not provide or refuses to provide the aforementioned data and produce documents, the Reception staff member is entitled to ask the Guest to provide the telephone number of the Minor's parent or legal guardian in order to contact them and confirm the information obtained from the Hotel Guest. At the same time, the caller shall be informed of the processing of their personal data for the purpose of protecting the Minor's interest and shall be provided with information about the data Controller and the place where they can read the full information clause (Annex No. 3).
5. In the event of refusal to cooperate, the Reception employee is obliged to inform the supervisor / Hotel Director of the situation. Before engaging in a dialogue with the Minor, the Director shall engage in a conversation with the adult in order to obtain the necessary documents for identification.
6. The immediate supervisor / Hotel Director may also ask the Minor questions about their relationship to the Guest and their personal details and those of their parents or legal guardians, in such a way as not to cause the Minor any discomfort.
7. The Supervisor / Hotel Director shall notify the Police in case of further doubts and the adult as well as the child should remain under observation of the Hotel staff until the arrival of the Police.

§7

Type of personal data of the Minor collected during identification

1. During the identification of the Minor, the processing of the Minor's personal data occurs with regard to the information contained in the documents presented and provided by the Hotel Guest or the person called on the telephone.
2. The employee may record and store the following personal data of the Minor:
 - a. Name and surname,
 - b. age or date of birth,
 - c. PESEL (National Identification Number),
 - d. document number,
 - e. place of residence,
 - f. data of parents/legal guardians,
 - g. relationship to the Hotel Guest.
3. The Minor's personal data will be recorded in the registration system.
4. Where the Minor shows signs of disability or special needs – the Minor's details may also include this information.
5. The processing of the Minor's data should not go beyond the identification data indicated above, if the processing is carried out for the sole purpose of identifying and ensuring the safety of the Minor.

§8

Procedure in case of circumstances indicating harm to a child

1. If you have a reasonable suspicion that a child staying at the 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 circumstances, the call is made by the person who directly witnesses the incident (employee/supervisor). If the notifier is an employee, they shall simultaneously inform their supervisor of the incident.
2. Reasonable suspicion of child abuse occurs when:
 - a. the child has disclosed the abuse to the worker,
 - b. the employee has observed the abuse,
 - 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 Hotel.
4. In justified cases, a citizen's arrest of a suspect may be made. In such a situation, the person should be kept in a separate room away from the view of other visitors, under the supervision of two members of staff, until the police arrive.
5. In all cases, the safety of the child 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. After the child has been collected by the police, the CCTV footage and other relevant evidence (e.g. documents) concerning the incident should be secured and, if requested by the services, a copy should be forwarded by registered letter or in person to the public prosecutor or the police.
8. After the intervention, the incident should be described in an incident log or other document intended for this purpose.

§9

Providing data to the police

In the event of notification to the Police or other authorised services, the relevant regulations for the provision of personal data to state authorities shall apply with regard to the provision of personal data to them of Guests and Minors.

§10

Preparing the employees of the Facility to apply the Procedure

1. The Hotel Director is required to train the Facility staff in the use of the Procedure, in particular:
 - a. the need to respond to and report without undue delay to a supervisor unusual or suspicious situations in which child abuse is suspected
 - b. the manner of communication with the Minor and prohibited behaviour
2. The training referred to above shall be conducted periodically at least once a year.
3. At least once every two years, Gołębiewski Holding Sp. z o.o. will evaluate the standards to ensure that they are adapted to current needs and comply with applicable regulations. The conclusions of the evaluation will be documented in writing.

§11

Hiring people to work with children

1. All persons working with children must be safe for them, which means, among other things, that their employment history should indicate that they have not harmed any child in the past.
2. It is mandatory for every person employed by the Hotel for work related to education, leisure and childcare to be checked against the Sex Offender Register. Checking a person against the Register is done by printing out the results of a search of the person against the Register with restricted access, which is then inserted into the personnel file of the person checked. The check should be repeated annually. The range of personal data necessary to check a person against the Register is set out in Annex No. 4.
3. All employees hired to work with children, including those who may have potential contact with children, should submit a declaration of no criminal record and no proceedings for acts against children – Annex No. 5.

§12

Final provisions

1. The procedure can be accessed at the Facility, at: www.golebiewski.pl.
2. Information for the Minor on the rules related to the implementation of the Procedure is attached as Annex No. 2 and is available in a visible, publicly accessible place in the Facility
3. An amendment to Annex No. 2 and Annex No. 3 does not require a change of procedure.

Annexes:

- Annex No. 1 – Template of the information plate
- Annex No. 2 – Information for the minor
- Annex No. 3 – Information clause for parents
- Annex No. 4 – Scope of data for checking a person against the Sex Offender Register
- Annex No. 5 – Template of the employee's declaration

Annex No. 1
Template of the information plate FOR THE RECEPTION DESK

Our facilities are concerned about the safety of children and have procedures in place to protect them.

Therefore, you will be asked to show identification documents and provide personal data of minors staying / intended to stay with you in our Hotel.

Thank you for your cooperation and for looking after the welfare of children together!

Legal basis: Article 22c section 3 of the Act of 13 May 2016 on counteracting the threat of sexual offences and the protection of minors (Journal of Laws 2023, 1304, as amended).



**Annex No. 2
Information for the minor:**

ARE YOU SCARED? WE WILL HELP YOU!



Annex No. 3

Information clause – for contacting the parent / legal guardian of a minor

Pursuant to Article 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter 'GDPR'), in relation to the receipt of your personal data as a parent or legal guardian of a child staying at one of our hotels, we hereby inform you that:

1. In relation to the above, the Controller of your personal data will be Gołębiewski Holding sp. z o.o. with its registered office in Ciemne; 05-250 Ciemne, Radzymin; ul. Wołomińska 125, NIP [Tax Identification Number]: 125-173-93-35, REGON [National Business Register Number]: 523380176), entered into the Register of Entrepreneurs of the National Court Register kept by the District Court for the Capital City of Warsaw in Warsaw, 14th Commercial Division of the National Court Register under KRS No.: 00009996308; branches:
 - Hotel Gołębiewski in Mikołajki, ul. Mrągowska 34, 11-730 Mikołajki, mikolajki@golebiewski.pl, phone No. 87 42 90 700
 - Hotel Gołębiewski in Białystok, ul. Pałacowa 7, 15-064 Białystok, bialystok@golebiewski.pl, phone No. 85 67 82 500
 - Hotel Gołębiewski in Wisła, al. Ks. Bp. Bursche 3, 43-460 Wisła, wisla@golebiewski.pl, phone No. 33 85 54 700
 - Hotel Gołębiewski in Karpacz, ul. Karkonoska 14, 58-540 Karpacz, karpacz@golebiewski.pl, phone No. 75 76 70 740
2. The contact person for all matters concerning the processing of personal data and the exercise of rights related to the processing of personal data at the Controller is the Data Protection Officer, who can be contacted via e-mail at: iod@golebiewski.pl.
3. The processing of your personal data shall be carried out for one or more of the following purposes: on the basis of Article 6(1)(c) of the GDPR, as necessary for the performance of a legal obligation incumbent on the Controller, in particular the exercise of rights under the GDPR and consumer rights; a) on the basis of Article 6(1)(d) of the GDPR, in order to protect the vital interests of a minor child who is a guest of the hotel, for whom you are the parent or legal guardian and about whom there is a doubt as to whether they are on the hotel premises with your consent and knowledge; b) on the basis of Article 6(1)(f) of the GDPR, in order to pursue the legitimate interests pursued by the Controller, including establishing, defending and pursuing claims;
4. The Controller processes the following categories of personal data: first name, last name, PESEL (National Identification Number) or passport number (if the Controller has received documents containing them from a hotel guest staying with a minor child), correspondence address, telephone number, e-mail address.
5. 5. You have the right to exercise the following rights under the terms of Articles 15-22 of the GDPR – full privacy policy available at: www.golebiewski.pl