

## CHILD PROTECTION STANDARDS Orbis S.A. hotels.

In relation to the obligation imposed under the Act of 13 May 2016 on the Prevention of the Threats of Sexual Offences and the Protection of Minors, these Child Protection Standards (also referred to as the "CPS", the "**Standards**") have been adopted at Orbis S.A. hotels. This document constitutes a set of rules and procedures to apply in the event of suspected abuse of a child staying at a Hotel and to prevent such threats. These Child Protection Standards are implemented at the Hotel on the basis of applicable legislation.

### Glossary:

For the purposes of this document, the following terms shall mean:

1. **Hotel** - hotel Mercure Warszawa Grand
2. **Child/minor** - a minor is a person who has not come of age, i.e. a person under the age of 18.
3. **Guardian of a child** - the child's statutory representative: *a parent or guardian*, as well as *a foster parent or temporary legal guardian* (i.e. person authorised to represent an unaccompanied minor Ukrainian citizen residing in the Republic of Poland); *parents* - Article 98 of the Family and Guardianship Code; *guardian* - Article 155 of the Family and Guardianship Code; *foster parent* - Article 1121 of the Family and Guardianship Code; *temporary legal guardian*: Article 25 of the Act on Assistance to Citizens of Ukraine in Connection with the Armed Conflict in Ukraine.
4. **Unrelated adult** - any person over the age of 18 who is not the child's Guardian.
5. **Child abuse** - behaviour that may constitute an offence against a child by any person, including a Hotel Employee, or which poses a threat to the best interests of a child, including neglect of a child, in particular, any form of violence against a child as well as any intentional or unintentional act/omission of an individual, institution or society as a whole as well as any result of such act or failure to act which violates the rights, freedoms and personal rights of children.
6. **Forms of violence against a child:**
  - 1) **Physical violence** against a child is violence following which the child suffers actual physical harm or is potentially at risk of physical harm. Physical violence against a child can be a recurrent or a single act.
  - 2) **Psychological** child abuse is a chronic, non-physical, harmful interaction with a child involving both actions and omissions. It includes, but is not limited to emotional unavailability, emotional neglect, a relationship with the child based on hostility, blame, slander, rejection.
  - 3) **Sexual abuse of a child** involves a child in sexual activity that the child is unable to fully understand or to which give informed consent, and/or for which the child has not reached developmental maturity and cannot give its consent in a legally valid manner, and/or which

breaches the legal or moral standards of a given society. Sexual abuse occurs when such act takes place between a child and an adult or a child and another child if these individuals, because of their age or development stage, remain in a relationship of care, dependence, or power. Sexual abuse can also take the form of **sexual exploitation**, or any actual or attempted abuse of a position of vulnerability, a power advantage or trust for sexual purposes, including, but not limited to, financial or social gains from the sexual exploitation of another person.

- 4) **Child neglect** is the chronic or incidental failure to satisfy a **child's** basic physical and psychological needs and/or to respect its basic rights, resulting in health disorders and/or developmental difficulties. Neglect occurs in a child's relationship with a person who is committed to care for, nurture, mind and safeguard the child.
- 5) **Offence against a child** - all offences that can be committed against adults and, in addition, offences that can only be committed against children (e.g. *sexual abuse* under Article 200 of the Criminal Code). Considering the specific nature of hospitality facilities where privacy is easily obtained, offences most likely to occur within their premises will be offences against sexual freedom and morality, in particular *rape* (Article 197 of the Criminal Code), *sexual abuse of a state of insanity and helplessness* (Article 198 of the Criminal Code), *sexual abuse of a state of dependence or critical situation* (Article 199 of the Criminal Code), *sexual abuse of a person under 15 years of age* (Article 200 of the Criminal Code), or *grooming* (minor seduction by means of distance communication - Article 200a of the Criminal Code).
- 6) **Other forms of child abuse** than committing a criminal offence against a child - all forms of violence directed against a child that do not meet the criteria of a prohibited act and are prosecuted *ex officio* (e.g. shouting, humiliation, pulling, name-calling, neglect of needs, etc.).
- 7) **Employee** is a person employed under a contract of employment or working under a similar contract (e.g. contract of mandate, B2B, contract for specific work), as well as an intern, trainee, volunteer, etc.
- 8) **Delegation** is the entrustment to an existing Employee of new duties/tasks directly related to education, leisure, sports or minding of children at the Hotel.
- 9) **Employee working with children** is any person who directly performs tasks or is delegated to perform tasks related to education or leisure or to the minding of children at the Hotel (children of Hotel customers, as well as minor apprentices, trainees, persons employed under an employment contract as part of their vocational training).
- 10) **Entrepreneur** - Orbis S.A. with its registered seat in Warsaw.
- 11) **Act** - Act of 13 May 2016 (Journal of Laws 2016, item 862, as amended) on the Prevention of the Threats of Sexual Offences and the Protection of Minors.

## CHAPTER 1. HOTEL STAFF

## General principles

1. Orbis S.A. (Hotel) will educate its Employees on circumstances indicating that a child staying at the Hotel may be abused and on how to react quickly and appropriately to such situations. Such education will be provided through various forms of training e.g.: external training at the Hotel, in-house training, e-learning, educational materials developed by the Entrepreneur or other organisations.
2. Each Hotel Employee, prior to being allowed to work, will be introduced to the CPS, which will be confirmed by his/her statement and commitment to comply with the rules and procedures set forth in this document. A sample statement has been attached as **Annex 1**.
3. Hotel Employees, especially those employed to work with children, are subject to periodic training, including CSP training.
4. The Hotel commits itself to take account of the situation of children with disabilities and special educational needs by adapting the guidelines in **Annex 12** to the specific profile and the scope of operations of a facility.

## Recruitment of staff members working directly with children

1. An inquiry will be sent to the Sex Offenders Register in relation to any Employee hired to work with children before he or she is allowed to work. This also applies to Employees who are minors, i.e. under 18 years of age. A check of a person in the Register takes place by printing out search results of the subject person in the Register with restricted access, which are later attached to the personal file of the checked person or enclosed to the civil law contract on the basis of which the person works, provides services or undergoes an internship. The scope of personal data necessary to have a person checked in the Register is provided in **Annex 3**.
2. In addition, each Employee hired to work with children shall, before being allowed to work, provide information from the National Criminal Register (alternatively, such a certificate may be requested by the employer) with respect to the offences specified in Chapters XIX and XXV of the Criminal Code, Art. 189a and Article 207 of the Criminal Code and the Act on Preventing Drug Addiction of 29 July 2005 (Journal of Laws of 2023, item 172 and of 2022, item 2600), or to corresponding offences specified by foreign law.
3. If the Employee hired to work with children has a nationality other than Polish, he/she should also submit information (an affidavit) from the criminal registry of the country of citizenship obtained for the purposes of professional or voluntary activities involving interactions with children, or criminal record information if the law of that country does not provide for the provision of information for the above purposes.
4. An Employee hired to work with children shall also be required to submit a statement on the country(ies) of residence in the last 20 years other than the Republic of Poland and the state of citizenship. If the Employee has resided in countries other than the Republic of Poland or the state of citizenship in the last 20 years, he/she should also submit to the employer information

(an affidavit) from the criminal records of those countries obtained for the purposes of professional or voluntary activities related to interactions with children as well as information from the criminal record. The statement specified in the first sentence of this paragraph shall be made under penalty of perjury. A sample statement has been attached as **Annex 4**.

5. If the law of the country from which the criminal record information is to be submitted does not provide for the provision of such information or does not operate a criminal record registry, the Employee hired to work with children shall then make such declaration under penalty of perjury. A sample declaration has been attached as **Annex 5**.
6. Under the declarations specified in points 4 and 5 above, the declarant shall additionally make the following declaration: "I am aware of criminal liability for making a false declaration." This statement replaces information of the authority on criminal liability for making a false declaration.
7. If, in cases specified in points 3 or 4, there is no certificate from a relevant register, an affidavit with different content has been provided or if there is no relevant register in the country concerned (especially if the person states that he/she lived more than 3 months in another country in the past 20 years or worked in another country), the Hotel shall send an inquiry to the Entrepreneur's HR department or legal department.
8. In the event of outsourcing, the Hotel should include an appropriate clause in its contract with that entity regarding the entity's compliance with provisions of the Act, including its obligations to screen Employees who will engage in any of the activities covered by the Act with respect to children, particularly those related to education, recreation or sports. The clause should enable the Hotel to monitor compliance with its obligations provided under the Act and, in the event of a violation, give it the right to terminate the contract immediately.
9. A table listing typical positions of Employees hired to work with children has been presented in **Annex 8** but is not exhaustive. It is recommended that the records specified in points 1 and 2 above be consulted or that the statements referred to in points 4 and 5 be requested from all Hotel Employees in relation to whom there are reasonable grounds to assume that they may be defined as an Employee hired to work with children as a result of their position or activities.
10. The hotel is committed to check Employees hired to work with children in the Sex Offenders Register every five years.

#### **The scope of competence and responsibilities of persons designated to implement the Child Protection Standards at the Hotel**

1. Application of the CPS is supervised by Orbis S.A. The Hotel appoints an CPS Coordinator (hereinafter referred to as the "**Coordinator**") to supervise the application of CPS at the Hotel.
2. The Coordinator is responsible for familiarising Hotel Employees with the content of the CPS and monitoring application of the CPS at the Hotel. The Coordinator organises and documents training of Hotel Employees in line with guidelines set by the Entrepreneur.

3. In the event of child abuse at the Hotel, the Coordinator must follow necessary procedures as outlined in the CPS. At the same time, the Hotel must report such an incident as a crisis situation in line with the Accor network's crisis communication guidelines (ALERT or any other) and notify the Management Office and Accor at designated addresses.
4. The Coordinator describes each intervention or reported incident at the Hotel related to child abuse within Hotel premises in an appropriate document (Crisis Communication incident Alert log).
5. In the event of a reasonable suspicion that a crime has been committed, the Coordinator is responsible for securing evidence, including footage from CCTV cameras, and its handover, after prior consultations with Orbis' legal department, to the public prosecutor/court or police.
6. The Coordinator is responsible for monitoring and updating the Hotel's CPS and their availability to Employees, guests as well as other entities associated with the Hotel.

#### **Rules of a safe Employee-child relationship**

1. All Hotel Employees are required to comply with the following principles.
2. The guiding principle of all actions taken by Employees interacting with children within Hotel premises is to treat a child with respect and to take into account its dignity and needs.
3. It is unacceptable to use any form of violence against children.
4. Behaviour and practices expected from Hotel Employees:
  - a) be patient and respectful in your communication with a child,
  - b) listen attentively to the child and give answers appropriate to its age and the situation; while communicating with a child, try to make sure that your face and the face of the child are at the same physical level,
  - c) if a child feels uncomfortable about a situation, reassure it that it can speak about it with you or another designated person and get help,
  - d) inform the child where the CPS may be found at the hotel in a version it understands; reassure the child that if it has any questions, it can approach you or another designated person,
  - e) treat children equally irrespective of their gender, sexual orientation, ability/disability, social status, ethnicity, culture, religion and beliefs=,
  - f) provide a safe space; if there are children in the area where you work, make sure that equipment and furnishings are used as intended and that the environment is safe (pay attention to safeguarding measures in windows and in staircases, restricted access to busy roads, open water, etc.).

- g) 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.

### **Unacceptable behaviour and practices of Employees in relation to children at the Hotel**

1. Do not shout, shame, humiliate, disrespect or insult a child.
2. Do 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.
3. Do not engage into any erotic or sexual relationship with a child or make inappropriate proposals to it. This includes sexually explicit comments, jokes, gestures as well as sharing of erotic and pornographic content in any form with a child.
4. You are not allowed to record the image of a child for private or business purposes (recording, photographing) without consent of the child's parents/guardians and consent of the child. This also applies to allowing third parties to record images of children. An exception to this rule is when a child's image is only a detail of a whole such as a gathering, landscape, public event, in which case consent of the child's parent/guardian is not required.
5. Do not make contact with a child via private communication channels (private phone, email, instant messaging, social media profiles); the exception is communication with a minor apprentice, student, trainee, adolescent worker related to professional matters. Do not meet a child outside the workplace.
6. Do not offer alcohol, tobacco products or illegal substances to a child.
7. Never touch a child if it does not want you to or in a way that could be considered indecent or inappropriate.

**If you are a witness to any of the above behaviour and/or situations involving other adults or children, always notify your Coordinator or line manager or the Manager on Duty.**

### **CHAPTER 2. PROCEDURE FOR ESTABLISHING THE IDENTITY OF A CHILD DURING CHECK-IN AT THE RECEPTION**

1. Identification of a child staying at the Hotel and its relationship to the adult with whom it stays with is an effective way to prevent child abuse.

The receptionist shall take all possible steps to establish the identity of a child and its relationship to the adult with whom the child stays. If there is any doubt as to the child's relationship to the adult, in order to establish the identity of the child and its relationship to the person with whom it stays at the Hotel, it is necessary to: ask for the child's identity document (any document, ID, passport, student card, monthly travel pass), and also ask for a document confirming that the adult has custody rights to the child (ID, passport, driving licence, mObywatel app, Online Patient Account, court decision, parental authorisation/consent, etc.). If there is no identity document of the child or in the event of refusal to produce it, the child's details (name, address, age) should

be requested. These details are used for one-time identification only and may not be copied and stored unless there is suspicion of at least child abuse.

In the absence of documents indicating the relationship between a child and an adult or refusal to produce them, the adult and child should be asked about their relationship. A sample script of the adult and child interview has been attached as **Annex 2**.

If the adult is not the child's parent or legal guardian, he or she should be asked to produce a document, e.g. a parental consent/an affidavit with consent for that person to travel with the child or consent signed by the child's parent, indicating the child's details, age, address of residence, telephone number of a parent and identity document number of the person to whom the parent has entrusted care of the child. Such a statement/consent from a parent is for one-time identification only and may not be copied and stored unless there is a suspicion of at least child abuse.

**If the adult does not have any of the above documents, he/she should be asked to complete an appropriate declaration in line with the template attached as Annex 13. The declaration contains details of the child and the adult with whom the child stays and specifies the relationship between the child and the adult. If the adult is not the child's parent or legal guardian, he/she should declare that the parents/legal guardians have agreed to him/her taking care of the child. The declaration is attached to the registration form.**

2. If the adult refuses to produce the child's document and/or specify the relationship, he/she should be informed that the procedure is meant to ensure the safety of children staying at the Hotel and that Hotel employees, in line with provisions of the Act, must comply with obligations regarding the protection of minors. Once the matter has been clarified, please thank for the time taken to ensure that the child is well looked after.
3. If the conversation does not allay suspicions concerning the adult and his/her intentions to abuse the child, especially if the adult refuses to show an ID or the child does not have an ID and refuses to make a written statement, this should be discreetly reported to the supervisor and security personnel (if present within the premises at the time) in such a way as not to arouse suspicion (for example, employees may claim they need to use equipment in the reception back office or ask the adult to wait with the child in the lobby, restaurant or elsewhere).
4. From the time when initial doubts arise, both the child and the adult should be monitored at the Hotel whenever possible.
5. The supervisor who has been notified of the situation takes over the conversation with the adult to obtain further clarification.
6. If the conversation confirms suspicion of an attempt to commit an offence or that an offence against a child has been committed, the supervisor shall notify his/her supervisor of such fact and, in an obvious case, the matter should be immediately reported to the police. In such an event, the procedure applicable to circumstances indicating child abuse (see Chapter 3) applies.

7. If out of ordinary and/or suspicious situations are witnessed by employees of other departments, e.g. cleaning staff, room service, bar and restaurant staff, leisure area, security staff and others, they should immediately notify the supervisor or, in their absence, the decision maker who will take appropriate action (see Chapter 3 below).
8. Depending on the situation and location, the supervisor of the Employee reporting a questionable situation involving a child verifies the extent to which the suspicion of child abuse is justified. To this end, appropriate measures are taken to clarify the situation or to make an intervention and notify the police.

### **CHAPTER 3. PROCEDURE IN THE EVENT OF CIRCUMSTANCES INDICATING CHILD ABUSE BY AN ADULT - GENERAL PRINCIPLES**

1. Reasonable suspicion of child abuse occurs when: the child has revealed to a Hotel Employee of having been abused, the Hotel Employee has witnessed the abuse, the child bears signs of abuse (e.g. scratches, bruises) and when asked, the child responds incoherently and/or erratically and/or becomes embarrassed or there are other circumstances that may indicate abuse e.g. discovery of child pornography in an adult's room.
2. In the event of an existing threat to the safety of a child, an Employee who has reasonable suspicion of the above circumstances should immediately notify the Hotel Manager, the Manager on Duty or another decision maker as well as the Coordinator to decide whether the police should be notified. In the event of an imminent threat to a child's life and health, or if it is not possible to get in touch with supervisors, the Employee should notify the police directly by providing his/her own details, the child's details (if possible), the child's whereabouts and an overview of case circumstances. When notifying the police, it is necessary to describe the incident, describe the appearance of the persons involved, specify the direction in which they headed, possibly make a note and provide information about the make and registration number of the vehicle and/or taxicab in which the persons have left the hotel. The person who becomes aware of an incident shall also notify the Coordinator of that fact, at least by e-mail/written note.
3. Every effort must be made to make it difficult or even impossible for a child and a suspected child abuser to leave the Hotel and, if not risky (or such actions may be undertaken without risking one's health or life), a citizen's arrests of the suspected person can be considered with notification of hotel security.
4. In all cases, a child's safety should be ensured. Whenever possible, the child should remain in the care of the Employee until police/security arrive and, if possible, to support the child in line with the principles outlined in **Annex 10**.
5. If there is a reasonable suspicion that a crime has been committed entailing a child's contact with the offender's biological material (sperm, saliva, epidermis), the child should be prevented, if possible, from washing and eating/drinking until the police arrive. It should be explained to the child why such restrictions have been imposed on it.



6. Once the child has been taken into care by the Police, the CCTV footage and other relevant evidence (e.g. documents) relating to the incident should be secured and handed over to the Coordinator, who will forward a copy by registered mail or hand it over in person to the prosecutor or the Police, if requested by the law enforcement. After the intervention, the incident should be reported to the Coordinator, who will describe it in the incident log or other document intended for this purpose.

#### **CHAPTER 4. PROCEDURE IN THE EVENT OF SUSPECTED OR ESTABLISHED CHILD ABUSE BY A MEMBER OF STAFF OR OTHER ADULT WORKING FOR THE HOTEL**

1. In the event of suspected child abuse by an Employee or other adult who is not directly employed by the Hotel but by a third party, the person who becomes aware of this fact should immediately notify the Coordinator or, in the absence of the Coordinator, another person designated for this purpose.
2. In the event of an immediate threat to a child's life and health, the person who becomes aware of this fact should notify the police directly, giving his/her own details, the child's details (if possible), the child's whereabouts and an overview of case circumstances, as well as notify the Director, Manager on Duty or supervisor/decision maker who notifies the child's guardian/parents. The person who becomes aware of the incident should also notify the Coordinator of that fact, at least by e-mail/written note.
3. If an Employee has abused a child in a form other than a criminal offence against the child, the Coordinator who becomes aware of this should report such information to their supervisor for clarification and adequate measures.
4. If the person who has abused a child is not directly employed by the Hotel but by a third party (e.g. outsourcing), then a recommendation should be made to prohibit the abuser from entering the Hotel premises and, if necessary, to terminate the contract with the third party.

#### **CHAPTER V. PROCEDURE IN THE EVENT OF ESTABLISHMENT OF OTHER FORMS OF VIOLENCE AGAINST A CHILD BY A PARENT/LEGAL GUARDIAN OR OTHER ADULT STAYING WITH THE CHILD AT THE HOTEL**

1. If a child is found to be abused by a parent/legal guardian or other adult with whom the child stays at the Hotel, any Employee who witnesses such abuse should respond (draw attention to it).
2. In the event of an immediate threat to a child's life and health, the Employee should notify the police directly, giving his/her own details, the child's details (if possible), the child's whereabouts and an overview of case circumstances, as well as notify the Director, Manager on Duty or

supervisor/decision maker. The person who becomes aware of an incident should also notify the Coordinator of that fact, at least by e-mail/written note.

3. If a Hotel Employee witnesses physical violence against a child (spanking, pulling, shouting, other act listed in the definition of physical violence), he/she should try to stop the abuse and respond (pay attention). Possible forms and ways of responding to abusive behaviour by a parent/guardian/other adult towards a child have been listed in **Annex 11**.
4. If a child under the age of 7 is left unattended, the Employee who becomes aware of such incident should notify his/her supervisor. The supervisor notified of the situation decides on further measures, taking the circumstances into account. On their basis, the supervisor should attempt to locate the parent/legal guardian or other adult who accompanies the child within the hotel premises and explain that he/she cannot leave the child unattended. If it is not possible to locate the parent/legal guardian or other adult who accompanies the child within the Hotel premises, or the parent/legal guardian/other adult is not willing and/or is unable to take the child into own care, the supervisor shall notify the police. In all cases, the child's safety should be ensured.

## **CHAPTER 5: MONITORING AND EVALUATION OF THE CHILD PROTECTION STANDARDS**

1. The Coordinator monitors and evaluates the CPS once every two years in line with guidelines provided by Orbis S.A. (Management Office). Monitoring and evaluation include verification of CPS implementation, response to feedback on a violation of rules and procedures and proposed amendments to this document and, if necessary, their adaptation to current needs and ensured compliance with applicable regulations, as well as the requesting of amendments to the document. The Coordinator submits all and any conclusions and feedback obtained in relation to this procedure to the Orbis Management Office.
2. The Coordinator conducts a survey among Hotel Employees once every two years, on the basis of guidelines provided by the Management Office, to monitor the implementation level of the CPS. A template survey has been attached as **Annex 6**. In the survey, employees can suggest amendments and pinpoint violations of CPS policies and procedures at the Hotel.
3. The Coordinator processes surveys completed by Employees and compiles a monitoring report on this basis, which is then submitted to the Management Office of Orbis S.A. The Entrepreneur introduces essential amendments to the document and communicates the Child Protection Standards in the new wording to Employees.

### **Miscellaneous**

1. These Child Protection Standards enter into force on 15 August 2024.
2. The Child Protection Standards are communicated to all Employees by posting them on the Orbis S.A. website and on .....

3. The Child Protection Standards are communicated to guests by posting them on the Orbis S.A. website, their placement at the Reception and on the hotel's website.
4. The Child Protection Standards are available in a comprehensible and abbreviated version for children staying at the Hote, at a location accessible to them.

## **Annex 12 . Child Protection Standards with regard to the status of children with special educational needs, including disabilities**

### **I. General principles**

- 1) It is recommended to ensure the presence of a person with pre-medical first aid training and skills at the Hotel.
- 2) Any assistance provided to a child with special educational needs, including disabilities, must comply with applicable regulations and consider the best interests of the child.

### **II. II. Relationship between employees and children**

#### **1) Identification of a child's situation**

It is the responsibility of Hotel employees to identify the situation, including special needs, of a child to enable it to relax. They also must take account of information concerning a child provided by its parents (guardians).

#### **It is imperative to:**

- a) Identify individual needs of a child (to a reasonable extent) and the specific profile of its functioning, especially:
  - cognitive, emotional and social functioning with special stress on the specific disability of the child,
  - conditions and means necessary to satisfy the child's basic needs (physiological, including sensory, psychophysical, including the need to feel safe etc.) and the consequences of their deprivation,
  - how the child regulates its emotions,
  - how the child reacts to the physical proximity of others,
  - how the child communicates (language, specific tools and their type),
  - other factors relevant to the child.
- b) If the possibility of high-risk challenging behaviour, including aggressive, self-injurious behaviour, is identified, it is imperative to:
  - develop an understandable form of mutual communication - based on language/speech used by the child - adapted to the child's psycho-physical capabilities and allowing the child to express its will, including approval or objection to certain acts/behaviours as far as this is reasonable using alternative or assistive communication methods,
  - communicate to the child in an understandable way its rights and responsibilities and prospects for obtaining assistance, making sure that the message is clear and transparent to it,
  - introduce the child in an understandable manner to the standards and rules in force at the Hotel and the consequences of their violation for all parties,
  - communicate to the child in an understandable way how it should behave in situations that pose a risk to its own safety and the safety of others,
  - explain to the child in an understandable way which behaviour constitutes an invasion of privacy/intimacy of others, which behaviour hurts others, or cause them pain and suffering,

- make sure that the adult's response does not lead to a negative attitude of other children to the child to whom the intervention was addressed - all children involved in the incident, including witnesses, should be safeguarded.
- c) If abuse is suspected or established, it is always necessary to give a child an opportunity to express itself and present its view/opinion, bearing in mind that this may be the first and the only conversation for the child (it may not make any more attempts to seek support). It is particularly important to:
- express concern by declaring belief of the child,
  - reassure the child that it did the right thing by telling about the harm it experienced,
  - explain to the child that it is not to blame for the situation,
  - assess in an explicit negative way any form of violence to send a clear message that it is unacceptable and that it should be prevented/ stopped,
  - adequately inform the child that the matter will be dealt with by other appropriate persons, inform it that measures will be taken to ensure its safety and that it is not to blame for what occurred.

#### **4. The response procedure in cases of challenging, aggressive or violent behaviour of a child.**

The objective of this procedure is to safeguard all minors and adults staying at the Hotel in the event of a situation that poses a threat to their safety, health and life.

##### **Scope of applying the procedure:**

- violation of the physical integrity of others,
- psychological violence, violation of personal dignity,
- brawls, battery,
- creating a risk to one's own health and life and that of others,
- threat of violence,
- use of a dangerous object,
- destruction of property.

##### **Responsibilities:**

- any staff member may notice or be informed of acts of aggression or violence,
- each staff member is committed to react in a situation of aggression, violence (as a witness of an incident or having been notified of an incident), i.e. by trying to make sure the incident ends, by ensuring safety of the following persons: witnesses, the victim, the abuser - through their isolation,
- the response procedure is initiated by notifying a person designated to intervene, who will then deal with the case as a whole, or another decision maker (e.g. a director, expert).

### **IMPLEMENTATION PROCESS OF THE RESPONSE PROCEDURE**

#### **IN THE EVENT OF CHALLENGING, AGGRESSIVE OR VIOLENT BEHAVIOUR OF A CHILD**



- if increased tension, nervousness or difficulties are observed in a child that create the likelihood of challenging behaviour, including aggressive, self-injurious, threatening behaviour, it is necessary to take immediate steps to prevent its escalation, including the start of a calming, comforting conversation with the child, if possible, relating to a neutral subject (method of redirecting attention) or other calming/comforting actions,



- in the event of escalation of challenging, undesirable behaviour, an attempt should be made to have it discontinued or interrupted, adequately to the situation, taking into account the previously identified risk of challenging, aggressive, self-injurious behaviour and the individual proactive or non-aversive reactive strategies established and applied to children,



- if actions taken in a given situation do not produce results and challenging, aggressive or self-injurious behaviour escalates, persons designated to launch the intervention procedure or other staff members in the vicinity should be notified and requested to help; these persons should immediately notify decision makers or experts and provide support in a given situation,



- then, in the event of highly aggressive behaviour that cannot be stopped and which poses a threat to the child's own health and life as well as that of others, it is necessary, if required, to provide immediate pre-medical first aid, the emergency medical services or the police should be called and the child's parents (guardians) informed - in such situation, if necessary, possible and safe for everyone involved in the incident, the least invasive measures possible to stop the act of aggression may be used,
- the safety of everyone involved in the incident, including witnesses, should be ensured,



- if the circumstances of an incident allow, a person designated in the intervention procedure should immediately start talking to the child to give it an opportunity to express itself and present its view/opinion to identify the causes and circumstances of the incident; during the conversation with the child, unless it is disruptive, relevant information should be noted; at the end of the conversation a note should be made of the entire incident and of the information provided by its witnesses, while parents (guardians) should be notified of the situation,



- until it is certain that the incident has been resolved and that the challenging behaviour no longer continues, the child cannot be left unattended, or "lost from sight,"
- the safety of all participants and witnesses of the incident should be ensured, together with support, e.g. psycho-educational counselling.

**Special conditions for the intervention interview:**

- the interview should be conducted without time pressure or rushing of the child and should be adapted to the child's needs and capabilities; the interview venue should take into account, amongst others, specific perception and processing of sensory stimuli by the child;

the child's language and communication methods used by the child should be also taken into account,

- the interviewer should be familiar with how the child regulates its emotions (e.g. stimming/self-stimulating behaviour) and should know whether the child demonstrates challenging behaviour (e.g. aggressive, self-injurious behaviour) ,
- it is necessary during the interview to allow the child to speak freely and share concerns, not to interrupt, criticise, or supplement statements with own conjectures, not to comment on content communicated by the child, and not to undermine the significance of what occurred,
- the interview should be conducted in a calm atmosphere; after the interview, the child should be provided with adequate support until the situation becomes stable and the behaviour calms down - the child should not be left alone, "out of sight", until it is certain that the situation has become stable.

**Guidance for staff members:**

- the above procedure for responding to challenging, aggressive or violent behaviour of a child as well as tasks and the process to be followed when the procedure is launched should be familiarised,
- cooperation should take place with the person designated to launch the intervention procedure at the hotel/institution/business, following its instructions as the incident unfolds,
- the numbers of decision makers, persons responsible for interventions at the hotel/institution/business should be provided,
- competence necessary to take measures specified in the above procedure should be enhanced.