

STANDARDS FOR THE PROTECTION OF MINORS AT “WEZAJ” RECREATION CENTRE

PREAMBLE

*Taking into consideration the legal obligation arising from the provisions of the Polish Act of 13 May 2016 on counteracting the threat of sexual offences and the protection of minors, as well as the United Nations guiding principles on business and human rights, in acknowledgment of the significant role of business in ensuring respect for children's rights, the WEZAJ RECREATION CENTRE (hereinafter “**the Centre**” or “**RC WEZAJ**”) hereby adopts the Standards for the Protection of Minors (hereinafter “**Standards**”).*

This document constitutes a set of principles and procedures applied in cases of suspected harm to a child staying at RC WEZAJ and aimed at preventing such threats, taking into account the specific circumstances of children with disabilities and children with special educational needs.

Glossary:

For the purposes of these Standards, the following definitions shall apply:

1. **Child/minor** – any person under the age of 18.
2. **Child’s guardian** – the legal representative of the child: a parent or legal guardian; a foster parent; a temporary guardian.
3. **Another adult** – any person over the age of 18 who is not the child’s legal guardian.
4. **Child abuse** – any action which may constitute a prohibited act against a child, or which may threaten a child’s well-being, including neglect; any intentional or unintentional action/omission by a person, institution, or the society as a whole and any results of such action or omission which infringe rights, freedoms and well-beings of children and/or inhibit their optimal development.
5. **Forms of child abuse:**
 - **Physical child abuse** – acts of abuse causing actual physical harm to the child or creating a danger of physical harm to the child. It can be a one-time or repeated act.
 - **Emotional child abuse** – repeated, non-physical, harmful interaction between a child and a guardian, including actions and omissions, e.g. emotional detachment, emotional negligence, a relationship with a child based on animosity, blaming, denigration, rejection, developmentally inappropriate or inconsistent interactions with a child, overlooking or rejecting the child’s individuality and psychological boundaries between parent and child.

- **Sexual child abuse** – including a child in sexual activity, which the child is unable to fully understand and provide informed consent to, or for which the child is not sufficiently mature and cannot consent to in a legally valid way, or which is against the law or contrary to the social norms in a given society.
 - **Sexual exploitation of a child** – any actual or attempted abuse of a child’s position of vulnerability, differential power, or trust for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual abuse of the child.
 - **Child neglect** – repeated or incidental failure to meet a child’s basic physical and emotional needs or failure to respect a child’s basic rights, resulting in harm to the child’s health or developmental difficulties.
6. **Offence against a child** – a criminal offence where the victim is a child (includes both common offences and offences the victim of which, by definition, can only be a child).
 7. **Other forms of child abuse** which do not constitute criminal offences – any form of violence against a child which do not amount to a criminal offence (e.g. shouting, degrading, pushing, pulling, name-calling, neglecting needs, etc.).
 8. **Employee** – a person employed at the Centre on the basis of an employment contract or providing services for the Centre on the basis of a similar contract (e.g. contract of mandate, B2B, contract to perform a specified task), including interns, trainees, volunteers etc.
 9. **The Owners of RC WEZAJ/the Centre** – the entrepreneurs managing the Centre; when referred to individually (i.e. to “the Owner of RC WEZAJ”/”the Owner of the Centre”), the terms indicate situations where the default is an action by one (any) of the Owners.

I. GENERAL CONDITIONS

1. The activities of RC WEZAJ are conducted with respect of the rights of children as persons especially vulnerable to harm.
2. The Owners of RC WEZAJ recognise their role in conducting socially responsible business and promoting desirable social attitudes, particularly as regards the need to combat violence against children and the importance of the legal and social obligation of notifying law enforcement agencies of any suspected offences against children.
3. The Owners of RC WEZAJ undertake to take into account the specific circumstances of children with disabilities and children with special educational needs in accordance with the standards outlined in Schedule 9 hereto and with consideration of the nature and scope of the Centre’s activities.

II. ENSURING THAT THE CENTRE’S EMPLOYEES ARE FAMILIAR WITH THE STANDARDS

1. The Owners of RC WEZAJ undertake to educate their employees on how to identify circumstances indicating that a child staying at the facility may be abused and how to respond promptly and appropriately to such circumstances.
2. Before establishing an employment relationship, the prospective employee shall be acquainted with the Standards and shall sign a statement of acknowledgment of the

rules and procedures outlined herein (*the model statement is set out in Schedule 1 hereto*).

III. PRINCIPLES OF SAFE RELATIONSHIPS BETWEEN ADULTS AND MINORS

1. The following principles must be observed by all employees of RC WEZAJ as well as other adults who interact with children within the premises of the facility if the interaction is approved by RC WEZAJ.
2. The guiding principle of all activities undertaken by employees interacting with children at RC WEZAJ is treating children with respect and taking into account their dignity and needs.
3. It is strictly forbidden for employees or any other adults to use any form of violence against a child.
4. **Anyone who witnesses any behaviour that is contrary to the guidelines herein should promptly notify the Owner of RC WEZAJ by calling the following number:**

[+48 695694031]

BEHAVIOURS AND PRACTICES EXPECTED FROM EMPLOYEES

- When communicating with a child, be patient and respectful.
- Listen to the child carefully and provide answers appropriate to the child's age and given situation.
- When talking to the child, try to keep your face at the same level as the child's face.
- Assure the child that they can talk to you or another designated person and seek help if they feel uncomfortable in a given situation.
- Let the child know that they can read a simplified version of the Standards and tell them where to find them.
- Assure the child that they can talk to you or another designated person if they have any questions.
- Treat children equally regardless of their gender, sexual orientation, disabilities, social status, ethnicity, culture, religion, and worldview.
- Ensure the safety of the space. If there are children in your working area, make sure that the equipment and installations are used in accordance with their intended purpose and that the surroundings are safe (note the security of stairs and windows, limited access to busy roads, bodies of water etc.).
- If you notice an unaccompanied child/children and the situation may suggest that their safety is threatened, take steps to locate the child's parent/guardian.

BEHAVIOURS AND PRACTICES PROHIBITED TO EMPLOYEES

- You must not shout at, embarrass, humiliate, disregard, or insult a child.
- You must not hit, poke or push a child, or violate in any way the physical integrity of a child, unless there is a threat to the child's health or life.
- You must not form any romantic or sexual relations with a child or make any inappropriate offers. This includes making sexual comments, jokes, and gestures as well as sharing sexual or pornographic content with a child, regardless of the content's form.
- You must not record a child's image for private or professional purposes (filming, photographing) without the consent of the child as well as the child's parents/guardians. This includes enabling third parties to record images of children.

The exception to the above is when a child's image constitutes only a detail in a larger scene, such as a gathering, landscape, or public event—in such a case, the consent of a parent/guardian is not required.

- You must not communicate with a child using private channels (private telephone, email, communication apps, social media profiles) or meet with a child outside the workplace.
- You must not offer alcohol, tobacco products, or illegal substances to a child.
- You must not touch a child if they do not want it or in any way which may be considered inappropriate or improper.

IV. CHILD IDENTIFICATION PROCEDURE DURING CHECK-IN AT THE RECEPTION DESK

1. For the purposes of preventing child abuse, the Centre adopts the following procedure to establish the identity of children staying at the Centre as well as their relations with the adults who accompany them.
2. The employee at the reception desk shall take all available steps to establish the identity of a child and their relation with the adult who accompanies them.
3. In order to establish the identity of a child and their relation with the adult who accompanies them, the employee shall:
 - a. ask to see the child's identity document or another document confirming that the adult has custody over the child. Documents which may be used to establish identity include: an ID card, school ID, mObywatel app, Patient Online Account, court decision. If the guests fail to present the child's identity document or refuse to do so, ask them to provide the child's personal data (e.g. name, surname, address, date of birth).
 - b. if the guests do not have a document specifying their relation to the child or refuse to present it, ask both the adult and the child to specify that relation. An example framework for a conversation between an adult and a child is available in Schedule 2 hereto.
 - c. if the adult is not a parent or a legal guardian of the child, ask the person to present a document specifying their relation with the child and confirming their right to take care of the child, e.g. a written consent to travel with the child signed by a parent and certified by a notary public; or a written consent to travel with the child signed by a parent and containing the child's personal data, address, contact telephone number to the parent, and the ID number/PESEL number of the person to whom the child was entrusted.
 - d. if the adult does not have a document specifying their relation with the child and confirming that the child was entrusted to them, ask them to fill in the applicable statement form, in accordance to the model prepared by the Centre (see Schedule 3 hereto). The statement should include the personal data of the child and the adult taking care of the child and specify the relations between the child and the adult. If the adult is not a parent or a legal guardian of the child, the adult should declare that the child's parents/legal guardians entrusted the child to them.
4. If the adult refuses to present the child's identity document or specify their relation, the employee should explain that the procedure is aimed at ensuring the safety of children staying at RC WEZAJ and that collecting the requested information is required under the Polish Act of May 13, 2016 on counteracting the threat of sexual

offences and the protection of minors. If the issue is resolved amicably, the employee should thank the guests for helping ensure that the child is in safe hands.

5. If the procedure has not resolved the employee's doubts about the adult and their intention of harming the child and especially if the adult refuses to present an identity document or fill in the statement providing personal data of the child, the employee should notify the Owners of the Centre.
6. Depending on the situation, the Owner of RC WEZAJ shall determine whether the suspicion of child abuse is reasonable. For this purpose, the Owner of the Centre shall undertake appropriate steps to clarify the situation.
7. If the undertaken steps confirm the suspicion of attempted or actual offence against a child, the Owner of RC WEZAJ shall notify the police.
8. If other employees of RC WEZAJ witness unusual or suspicious situations, they should promptly report this to the Owner of RC WEZAJ. In such a case, the provisions of sec. 6-7 of the procedure apply accordingly.

V. PROCEDURE IN CASE OF SUSPECTED OR ACTUAL CHILD ABUSE BY AN ADULT

1. A reasonable suspicion of child abuse occurs when:
 - a. a child has informed an employee about the abuse;
 - b. an employee has witnessed an act of abuse;
 - c. a child shows signs of abuse (e.g. scratches, bruises) and, when asked about it, they show embarrassment or their answers are chaotic or inconsistent;
 - d. there are other circumstances which may indicate abuse, e.g. audible noises from a room suggesting violence, finding child pornography in an adult's room.
2. An employee who has a reasonable suspicion that a child staying at the facility has been abused should promptly report it to the Owner of the Centre, who shall in turn notify the police. If an employee witnesses child abuse, they should react to the situation decisively. In particular, if an employee is a witness of physical abuse against a child (spanking, pushing, screaming, or any of the other acts specified in the definition of physical abuse), they should attempt to stop such abuse.
3. If an employee determines that there is an active threat to a child's safety, such employee shall immediately notify the police of their reasonable suspicion by calling 112 and describing the situation. Irrespective of the above, the employee shall also notify the Owner of the Centre of the incident.
4. The employee should undertake to hinder or even stop the child and the person suspected of abusing the child if they attempt to leave the facility.
5. In circumstances provided for in the Polish Code of Criminal Procedure, it is acceptable to perform a citizen's arrest of the suspect. In such a case, the arrested person remains under the supervision of the employees of the Centre who are able to perform such actions without risking their own health or life.
6. In each case, the child's safety must be ensured. Whenever possible, the child should remain in the care of an employee until the arrival of the police. If possible, the employee should attempt to support the child (see Schedule 7).
7. If there exists a reasonable suspicion of an offence involving a child's contact with the perpetrator's biological material, whenever possible, the child should be

prevented from washing, eating, or drinking until the arrival of the police. The child should be informed why these restrictions are being applied.

8. Once the child is safe in police care, the employee should secure surveillance footage and any other relevant evidence (e.g. documents, a list of potential witnesses) concerning the incident and deliver it to the Owner of RC WEZAJ, who, upon request by the authorities, shall send a copy of the evidence by registered letter or hand it personally to the prosecutor or the police.
9. Should a child under the age of 7 be left without care, the employee who noticed the situation should inform the Owner of the Centre about it. The employee shall then attempt to locate the child's guardian and, if successful, explain to the guardian that they cannot leave the child without care. If the guardian cannot be located or if they refuse or are unable to take care of the child, the employee shall notify the police. In each case, the child's safety must be ensured.

VI. PROCEDURE IN CASE OF SUSPECTED CHILD ABUSE BY AN EMPLOYEE

1. A person who has a reasonable suspicion that a child has been abused by an employee should promptly report it to the Owner of the Centre.
2. If there is an active threat to a child's safety, such person should immediately notify the police by calling the emergency number 112 and providing their personal data, the child's data (if possible), location and the relevant circumstances of the incident as well as notify the Owner of the Centre. The Owner shall then notify the guardians of the child.
3. If an employee has abused a child in a way that does not constitute a criminal offence, upon being notified of the incident, the Owner of RC WEZAJ should investigate the circumstances of the case, in particular by talking to the employee suspected of abuse as well as other witnesses. If the incident resulted in a significant harm to the child's well-being and especially if the employee discriminated against the child or violated their dignity, the Owner shall pursue appropriate disciplinary action against the employee.
4. If the abuser is not employed directly by RC WEZAJ but rather by a third party (e.g. through outsourcing), the Owner shall consider banning such a person from entering the premises of RC WEZAJ or, if necessary, terminate the agreement with the third party.

VII. SUPERVISION OVER THE APPLICATION OF THE STANDARDS

1. The Owners of RC WEZAJ supervise the implementation of the Standards.
2. The Owners monitor the compliance with the standards at the facility and are responsible for ensuring that the employees are familiar with the Standards.
3. The Owners of RC WEZAJ document the employees' education on how to identify circumstances indicating that a child staying at the facility may be abused and how to respond promptly and appropriately to such circumstances. For this purpose, a document is drawn up containing: name and surname of the employee, type or form of acquired knowledge, including its source, as well as the date on which the employee underwent the training or acquired knowledge about identifying signs of child abuse.

4. If there exists a reasonable suspicion that a criminal offence has been committed, the employees of RC WEZAJ are responsible for securing potential evidence, including the surveillance footage and, upon request by the authorities, providing it to the prosecutor or the police either by registered letter or in person. The securing and transfer of evidence is coordinated by the Owners.
5. The Owners are responsible for conducting the procedure in situations where a child has been harmed by any person.
6. The Owners are responsible for monitoring and updating the Standards.
7. Monitoring and evaluation practices include the verification of the Standards' implementation, reacting to violations of the rules and procedures, as well as proposing changes to the document, especially for the purposes of adjusting them to current needs and applicable laws and regulations.
8. Once every 2 years, the Owners of RC WEZAJ shall conduct an employee survey to monitor the application of the Standards. A model of the survey is available in Schedule 4 hereto.
9. The employees may use the survey to propose changes and report any violations of rules and procedures outlined in the Standards.
10. The Owners of RC WEZAJ shall compile the employee surveys and use them to draw up a monitoring report. The report shall then be used as the basis for updating the Standards. Upon introducing any changes to the Standards, the employees shall be acquainted with their updated version.
11. The Owner's contact information (telephone number) is provided for the information of guests of the facility, including children, on the notice board at the Centre's reception. Sharing this information is intended to facilitate the reporting of suspected child abuse by any adult and provide abused children themselves with a way to disclose the abuse.

VIII. FINAL PROVISIONS

1. The Standards enter into force on 15 August 2024.
2. The Standards are available for all employees and guests on the RC WEZAJ website and at the reception.
3. The Standards are available in a shortened and simplified form for children staying at RC WEZAJ in a visible and accessible place.

Schedules:

- 1) Statement of acknowledgment of the Standards and familiarity with educational materials on counteracting child abuse.
- 2) Example framework for a conversation between an adult and a child during identification.
- 3) Statement of relation between adult and child.
- 4) Survey monitoring the implementation of the Standards.
- 5) Examples of circumstances which may create suspicion of or indicate child abuse.
- 6) List of employee positions at the facility subject to verification in the context of child protection.
- 7) How to talk to a child who is a victim of a criminal offence – guidelines for employees.
- 8) Appropriate responses when witnessing adults abusing children.
- 9) Standards with respect to children with special educational needs, including disabilities.

STATEMENT OF RELATION BETWEEN ADULT AND CHILD

CHILD'S PERSONAL DATA	
Name	
Surname	
Address	
Date of birth	
ADULT'S PERSONAL DATA	
Name	
Surname	
Address	
PESEL No.	

I hereby declare that:

- I am the child's parent;
 I am the child's legal guardian;
 the child's parents/legal guardians have entrusted me with the child.

(tick the appropriate)

(If you have selected the third option, please provide contact information for a parent/legal guardian of the child below for the purposes of confirming your right to take care of the child)

CONTACT INFORMATION OF THE CHILD'S PARENT/LEGAL GUARDIAN	
Name	
Surname	
Telephone number	

(signature of the adult accompanying a minor)

**EXAMPLES OF SITUATIONS WHICH MAY CREATE SUSPICION OF OR INDICATE
CHILD ABUSE**

IMPORTANT! The situations described below do not mean that a minor is actually being abused. It is important to remain vigilant and take note of alarming circumstances. Circumstances should also be considered alarming if the relationship between an adult and a child does not seem caring and casual.

The guest refuses to provide their personal data or the child's data.	The guest takes the child directly to the cabin and seems to be against the child making contact with the employee at the reception desk.
The guest states that they do not have their/the child's identity documents; they refuse to elaborate.	The guest accompanying a child invites other persons who are not guests to the facility (such people may only visit for a short time).
The guest accompanying a child pays by cash or a prepaid card. They pay every day (they do not know how long they will stay) or asks another person to pay for their stay.	The guest accompanying a child rents a cabin for a few hours or part of the day; or rents a cabin for a very long time.
The guest carries gadgets or items which could be given to children as gifts.	The guest travelling with a child does not have any luggage or arrives with very small luggage (a handbag/briefcase).
The guest appears at the facility with a child who was not checked in at the reception.	The adult acts in a sexually suggestive way towards a child and the relation between the adult and the child does not seem caring or natural.
The adult gives alcohol to a child	The child is dressed inappropriately to the weather or inadequately to the adult with whom they arrived at the facility.

During check-in, the child seems uneasy, stressed or forced to stay at the facility with the adult.	The children sell small items or ask for money next to the facility.
The child arrives at the facility late at night or at the time when they should be at school.	The child does not know where they are and, when asked about the purpose of their trip, they provide inconsistent answers.
The adult checking in with a child does not allow the reception employee to establish contact with the child – they respond when the child is asked, do not allow the child to speak.	The child seems to be under the influence of drugs or alcohol (distracted, wandering gaze, difficulty keeping balance, slurred speech, no reaction to stimuli).
Children are left at the cabin without supervision for extended periods of time (food is brought to them).	Adults who are not guests stay in the lobby, they seem to observe the area and contact the guest who arrived with a child.
The adult and the child rarely leave the cabin, almost never leave, or only leave when there are few guests moving about the facility.	Children who seem to be left without care ask for food, drinks, or money.

LIST OF EMPLOYEE POSITIONS AT THE FACILITY SUBJECT TO VERIFICATION IN THE CONTEXT OF CHILD PROTECTION

RC WEZAJ has conducted an evaluation of the obligation of employee verification by checking if their names appear in the Sex Offender Register and asking them to provide a certificate of clean criminal record in Poland or in other countries.

The evaluation has been conducted by distinguishing two types of positions:

1. The employee works with children **DIRECTLY**, e.g. conducts classes and takes care of minors at the facility – **obligation to verify the employee by checking if their name appears in the Sex Offender Register and requirement to collect a certificate of clean criminal record from the Polish National Criminal Register or, if applicable, registers managed by other countries.**
2. The employee has **INDIRECT** contact with children at the facility – **no obligation of verification.**

The facility does not employ persons in positions connected directly with working with children. The table below presents a list of positions which may have indirect contact with minors at the facility.

POSITION	CATEGORY	SCOPE	COMMENT
reception staff	INDIRECTLY	MINOR GUEST	when providing information to the minor, e.g. when the child leaves the parent/guardian (is lost)
owner	INDIRECTLY	MINOR GUEST	when acting as a host
security staff	INDIRECTLY	MINOR GUEST	in emergency situations requiring intervention
cleaning staff	INDIRECTLY	MINOR GUEST	may encounter a minor when cleaning another cabin or common areas at the facility

APPROPRIATE RESPONSES WHEN WITNESSING ADULTS ABUSING CHILDREN

If you witness a parent or a guardian abusing a child – pushing, calling names, humiliating, beating (e.g. spanking) – **REACT!**

Your reaction to the harm can give the child a sense of safety and hope for a better future. It can also help protect the child’s health and even life!

HOW YOU SHOULD REACT:

NOTICE

Indicate that you have noticed the child being abused. Establishing eye contact may be enough to stop the violent behaviour of a parent, guardian or another adult accompanying the child. Do not be afraid to observe. You have the right to watch what is happening on the premises of the facility or in any public space.

ESTABLISH CONTACT

If a parent is under the influence of such strong emotions that they cannot stop the violence against their child, they will be deaf to rational arguments. If you want to react appropriately, try to reduce tension.

Ask a simple question, e.g.: “Excuse me, did something happen?”

You can also relate to your own experiences, e.g.: “I remember when my children were this age. It’s a very difficult time. Can I help?”.

Sometimes all you have to do is say loudly: “I see that you’re having a hard time” or “Sometimes we have a bad day and we don’t get along well”.

The attempt to start a conversation may in itself give the parent pause and stop the violence against the child. It can also lead to further conversation and de-escalation.

NAME WHAT YOU SEE

Do not criticise or attack another person but do not be afraid to call things by their name.

Speak calmly but firmly about the cause of your concern, e.g.: “I saw that you hit a child”, “Please, don’t hit a child. Please, don’t ever do that again.”

STANDARDS WITH RESPECT TO CHILDREN WITH SPECIAL EDUCATIONAL NEEDS AND CHILDREN WITH DISABILITIES

In striving to prevent the exclusion of children with special educational needs, including disabilities, in accordance with the principle of promoting the welfare of every child, the standards for the protection of minors at RC WEZAJ are applied, taking into account the following provisions.

GENERAL PROVISIONS

1. Every minor shall be treated with due respect and shall not be discriminated against based on any traits, including special needs, disability, race, gender, religion, skin colour, national or ethnic identity, language, marital status, sexual orientation, health, age, abilities, political beliefs or social status.
2. All minors shall be treated with care for their welfare and development.
3. One must take into account the principles of universal design, reasonable accommodation and modification in order to ensure the accessibility for people with special educational needs, including disabilities.
4. One must strive to eliminate barriers restricting minors from independent functioning and expression.

STAFF ASSISTANCE

All assistance rendered to minors with special educational needs, including disabilities, must follow the provisions of applicable law and take into account the minors' best interests.

COUNTERACTING ABUSE

1. One must counteract all forms of ridicule, discrimination, humiliation, intimidation, denigration, and exclusion of minors, as well as any other form of physical, emotional or sexual violence. One must promptly react to any such incidents, including those between minors.
2. In case of suspected or actual abuse, one must encourage the minor to speak, present their view/opinion, bearing in mind that it may be the first and only opportunity for the minor to do so (the child may not seek help again). It is especially important to:
 - express your concern by assuring the minor that you believe them;
 - assure the minor that they made a good choice by talking about the abuse;
 - explain to the minor that they are not at fault for what happened;
 - unequivocally condemn any form of violence, giving a clear signal that it is unacceptable and must be stopped/prevented;
 - explain to the minor as appropriate that other people are going to take care of the situation and let them know that steps will be taken to ensure the minor's safety and that they are not at fault for what happened.

3. Behaviours prohibited to staff:

- discussing a minor's situation with other, unauthorised persons, including their family situation, health etc.;
- making disparaging comparisons to others;
- isolating a minor in a locked room, holding the door, use of force;
- intentionally provoking or escalating difficult or undesirable behaviours of a minor;
- dismissing a minor's request for help and support or treating it superficially or carelessly;
- passive attitude of staff with respect to the concern for a minor's safety and development in the face of a threat to the minor's welfare.