



CHILD PROTECTION POLICY (CPP)

POLICIES AND PROCEDURES

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CHILD PROTECTION POLICY

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CLUB HOTEL DOLPHIN AS A RESPONSIBLE TOURISM INITIATIVE AIMS TO HIGHLIGHT AND GENERATE AWARENESS ON CHILD ABUSE IN SRI LANKA, WHICH IT HAS A ZERO TOLERANCE POLICY ON. WE ENCOURAGE OUR GUESTS AND STAFF TO BE VIGILANT AT ALL TIMES PARTICULARLY IN RELATION TO THE PRESENCE OF PEDOPHILES AND TO REPORT ANY SUSPICIOUS ACTIVITIES TO EITHER THE HOTEL RECEPTION DIRECTLY, CONTACT CHILD LINE SRI LANKA OR THE NEAREST BRANCH OF THE SRI LANKA TOURIST POLICE.

UNDER THE NATIONAL CHILD PROTECTION AUTHORITY THE FOLLOWING ACTS ARE IN PLACE FOR THE PROTECTION OF CHILDREN IN SRI LANKA:

- EMPLOYMENT OF WOMEN, YOUNG PERSONS AND CHILDREN ACT, NO 8 OF 2003
- TSUNAMI SPECIAL ARRANGEMENTS ACT, NO 16 OF 2005
- PREVENTION OF CHILD MOLESTATION ACT, NO 30 OF 2005
- PREVENTION OF DOMESTIC VIOLENCE ACT, NO 34 OF 2005
- ACT, NO 7 OF 2006 (AMENDMENTS)
- ACT NO, 16 OF 2006
- ACT, NO 24 OF 2006 (AMENDMENTS)

CLUB HOTEL DOLPHIN IS COMMITTED TO CHILD PROTECTION. WE CONDEMN THE EXPLOITATION OF CHILDREN, A FUNDAMENTAL ABUSE OF A CHILD'S HUMAN RIGHTS AND DIGNITY, AND WE RESERVE THE RIGHT TO IMMEDIATELY TERMINATE BUSINESS WITH ANY PERSON OR COMPANY THAT IS ENGAGED OR ASSOCIATED WITH ANY FORM OF EXPLOITATION.

TOURISM BUSINESSES HAVE AN IMPORTANT ROLE TO PLAY IN PROTECTING CHILDREN'S RIGHTS. THE CLUB HOTEL DOLPHIN CODE OF CONDUCT COMMITS THE HOTEL TO UPHOLDING THE PRINCIPLES OF THE UN GLOBAL COMPACT.

BACKGROUND INFORMATION

CHILD PROTECTION REFERS TO PREVENTING AND RESPONDING TO VIOLENCE, EXPLOITATION AND ABUSE AGAINST CHILDREN – INCLUDING COMMERCIAL SEXUAL EXPLOITATION, TRAFFICKING, CHILD LABOR AND HARMFUL TRADITIONAL PRACTICES, SUCH AS FEMALE GENITAL MUTILATION/CUTTING AND CHILD MARRIAGE. VIOLATIONS OF THE CHILD’S RIGHT TO PROTECTION TAKE PLACE IN EVERY COUNTRY AND ARE MASSIVE, UNDER-RECOGNIZED AND UNDER-REPORTED BARRIERS TO CHILD SURVIVAL AND DEVELOPMENT, IN ADDITION TO BEING HUMAN RIGHTS VIOLATIONS. (SOURCE: UNICEF CHILD PROTECTION INFORMATION SHEET [HTTP://WWW.UNICEF.ORG/PUBLICATIONS/](http://www.unicef.org/publications/))

TOURISM CHILD-PROTECTION CODE OF CONDUCT

THE CODE OF CONDUCT FOR THE PROTECTION OF CHILDREN FROM SEXUAL EXPLOITATION IN TRAVEL AND TOURISM ([WWW.THECODE.ORG](http://www.thecode.org)). CHILD SEX TOURISM (CST) IS DEFINED AS THE COMMERCIAL SEXUAL EXPLOITATION OF CHILDREN BY MEN OR WOMEN WHO TRAVEL FROM ONE PLACE TO ANOTHER, USUALLY FROM A RICHER COUNTRY TO ONE THAT IS LESS DEVELOPED, AND THERE ENGAGE IN SEXUAL ACTS WITH CHILDREN, DEFINED AS ANYONE AGED UNDER 18. (SOURCE: ECPAT INTERNATIONAL WEBSITE [HTTP://WWW.ECPAT.NET/EI/CSEC_TERMINOLOGY.ASP](http://www.ecpat.net/ei/csec_terminology.asp))

CHILD ABUSE CAN TAKE FOUR FORMS, ALL OF WHICH CAN CAUSE LONG TERM DAMAGE TO A CHILD: PHYSICAL ABUSE, EMOTIONAL ABUSE, NEGLECT AND CHILD SEXUAL ABUSE. BULLYING AND DOMESTIC VIOLENCE ARE ALSO FORMS OF CHILD ABUSE. (SOURCE: UK NATIONAL SOCIETY FOR THE PREVENTION OF CRUELTY TO CHILDREN: [HTTP://WWW.NSPCC.ORG.UK/](http://www.nspcc.org.uk/))

UN GLOBAL COMPACT

THE UNITED NATIONS GLOBAL COMPACT IS A STRATEGIC POLICY INITIATIVE FOR BUSINESSES THAT ARE COMMITTED TO ALIGNING THEIR OPERATIONS AND STRATEGIES WITH TEN UNIVERSALLY ACCEPTED PRINCIPLES IN THE AREAS OF HUMAN RIGHTS, LABOR, ENVIRONMENT, AND ANTI-CORRUPTION. (SOURCE: UN GLOBAL COMPACT WEBSITE [WWW.UNGLOBALCOMPACT.ORG](http://www.unglobalcompact.org))

UN CONVENTION ON THE RIGHTS OF THE CHILD

THE UNITED NATIONS CONVENTION ON THE RIGHTS OF THE CHILD (UNCRC) IS AN INTERNATIONAL HUMAN RIGHTS TREATY THAT GRANTS ALL CHILDREN AND YOUNG PEOPLE (AGED 18 AND UNDER) A COMPREHENSIVE SET OF RIGHTS.



CHILD PROTECTION POLICY

CLUB HOTEL DOLPHIN ENSURE THAT CHILDREN ARE PROTECTED AGAINST SEXUAL ABUSE OR EXPLOITATION ON THE PREMISES AND THAT THE VENDORS AND ITS EMPLOYEES ARE AWARE OF THE CHILD-PROTECTION CODE AGAINST SEXUAL EXPLOITATION OF CHILDREN AND FOLLOW ITS RECOMMENDATIONS, SUCH AS REPORTING ANY SUSPICIOUS BEHAVIOR FROM GUESTS TO RELEVANT LOCAL AUTHORITIES.



CHILD PROTECTION POLICY

CLUB HOTEL DOLPHIN ENSURES THAT IF PERSONS AGED 18 OR UNDER ARE EMPLOYED, THEY ARE AFFORDED FULL PROTECTION IN ACCORDANCE WITH THE UN CONVENTION ON THE RIGHTS OF THE CHILD, AND LOCAL LEGISLATION, AND ARE PROVIDED WITH FAVORABLE WORKING TIMES AND FAVORABLE CONDITIONS OF WORK SPECIFICALLY DESIGNED TO PROTECT THEM.

INTRODUCTION

THIS POLICY AFFIRMS CLUB HOTEL DOLPHIN FUNDAMENTAL BELIEF THAT CHILDREN HAVE THE RIGHT TO BE PROTECTED AND FREE FROM ABUSE AND EXPLOITATION. CLUB HOTEL DOLPHIN ENDORSES THE UN CONVENTION ON THE RIGHTS OF THE CHILD (1989), AND SPECIFICALLY ARTICLE 19 WHICH STATES THAT:

PARTIES SHALL TAKE ALL APPROPRIATE LEGISLATIVE, ADMINISTRATIVE, SOCIAL AND EDUCATIONAL MEASURES TO PROTECT THE CHILD FROM ALL FORMS OF PHYSICAL OR MENTAL VIOLENCE, INJURY OR ABUSE, NEGLECT OR NEGLIGENT TREATMENT, MALTREATMENT OR EXPLOITATION, INCLUDING SEXUAL ABUSE, WHILE IN THE CARE OF PARENT(S), LEGAL GUARDIAN(S) OR ANY OTHER PERSON WHO HAS THE CARE OF THE CHILD.

THIS POLICY SEEKS TO ADDRESS THE IMPORTANT ISSUE OF CHILD PROTECTION AT ALL LEVELS AFFECTED BY THE WORK OF CLUB HOTEL DOLPHIN, AND WILL BE REVISED REGULARLY TO ENSURE IT REMAINS RELEVANT AND COMPLIES WITH CURRENT LEGISLATION. CLUB HOTEL DOLPHIN BELIEVES THAT THE PROTECTION OF CHILDREN FROM ABUSE AND EXPLOITATION IS THE RESPONSIBILITY OF ALL THOSE WHO PARTICIPATE IN THE WORKSPACE OF CLUB HOTEL DOLPHIN, INCLUDING STAFF, DIRECTORS AND VOLUNTEERS.

IN KEEPING WITH THE UN CONVENTION ON THE RIGHTS OF THE CHILD, CLUB HOTEL DOLPHIN CONSIDERS A CHILD TO BE A PERSON UNDER THE AGE OF 18 YEARS.

PURPOSE OF POLICY

THIS POLICY PROVIDES A PRACTICAL GUIDE TO PREVENT CHILD ABUSE AND EXPLOITATION IN CLUB HOTEL DOLPHIN AND IT DEMONSTRATES CLUB HOTEL DOLPHIN' COMMITMENT TO PROTECT CHILDREN FROM HARM AND ABUSE. IT AIMS TO EDUCATE CLUB HOTEL DOLPHIN STAFF, MANAGERS AND VOLUNTEERS (CLUB HOTEL DOLPHIN AMBASSADORS) ABOUT CHILD ABUSE AND EXPLOITATION AND PROMOTE A CHILD SAFE AND A CHILD FRIENDLY CULTURE WHERE EVERYONE IS COMMITTED TO KEEPING CHILDREN SAFE FROM HARM.

ADDITIONALLY, THE POLICY PROVIDES GUIDANCE ON HOW TO RESPOND TO CONCERNS AND ALLEGATIONS OF CHILD ABUSE OR EXPLOITATION.

CLUB HOTEL DOLPHIN MUST ADHERE TO LOCAL AND INTERNATIONAL CHILD PROTECTION CRIMINAL LAWS, WHICH PROHIBIT THE ABUSE AND EXPLOITATION OF CHILDREN. THESE INCLUDE LOCAL LAWS WHERE CLUB HOTEL DOLPHIN' EXIST, AND INTERNATIONAL LAWS AND CONVENTIONS IN RELATION TO ALL FORMS OF CHILD ABUSE AND CHILD EXPLOITATION, INCLUDING: CHILD SEX TOURISM, CHILD SEX TRAFFICKING, AND CHILD LABOR AND CHILD PORNOGRAPHY.

ADHERENCE TO THIS POLICY IS A MANDATORY REQUIREMENT FOR ALL CLUB HOTEL DOLPHIN AMBASSADORS.

CHILD PROTECTION POLICY

IMPORTANT CONCEPTS

TO UNDERSTAND THE SCOPE OF THIS POLICY, IT IS IMPORTANT TO UNDERSTAND A NUMBER OF CONCEPTS AND DEFINITIONS, WHICH ARE USED IN THE POLICY.

ACCORDING TO CHILD WISE, ABUSE OF A CHILD CAN OCCUR IN SEVERAL DIFFERENT WAYS, INCLUDING:

PHYSICAL ABUSE: OCCURRING WHEN A PERSON PURPOSEFULLY INJURES OR THREATENS TO INJURE A CHILD OR YOUNG PERSON AND CAN TAKE THE FORM OF SLAPPING, PUNCHING, SHAKING, KICKING, BURNING, SHOVING, OR GRABBING

EMOTIONAL ABUSE: A CHRONIC ATTACK ON A CHILD OR YOUNG PERSON'S SELF-ESTEEM, TAKING THE FORM OF NAME CALLING, THREATENING, RIDICULING, INTIMIDATING, OR ISOLATING A CHILD OR YOUNG PERSON

NEGLECT: THE FAILURE TO PROVIDE THE CHILD WITH THE BASIC NECESSITIES OF LIFE, SUCH AS FOOD, CLOTHING, SHELTER, SPACE, AND SUPERVISION, TO THE EXTENT THAT THE CHILD'S HEALTH AND DEVELOPMENT ARE PLACED AT RISK

SEXUAL ABUSE: WHEN A CHILD OR YOUNG PERSON IS USED BY AN OLDER OR BIGGER CHILD, ADOLESCENT, OR ADULT FOR HIS OR HER OWN SEXUAL STIMULATION OR GRATIFICATION

CHILD ABUSE AND EXPLOITATION GENERALLY REFERS TO ONE OF MORE OF THE FOLLOWING:

- COMMITTING OR COERCING ANOTHER PERSON TO COMMIT AN ACT OR ACTS OF ABUSE AGAINST A CHILD
- POSSESSING, CONTROLLING, PRODUCING, DISTRIBUTING, OBTAINING OR TRANSMITTING CHILD EXPLOITATION MATERIAL
- COMMITTING OR COERCING ANOTHER PERSON TO COMMIT AN ACT OR ACTS OF GROOMING OR ONLINE GROOMING

CHILD ABUSE MATERIAL IS MATERIAL THAT DEPICTS (EXPRESSLY OR IMPLICITLY) A CHILD UNDER 18 YEARS OF AGE AS A VICTIM OF TORTURE, CRUELTY, OR PHYSICAL ABUSE.

CHILD EXPLOITATION MATERIAL IS THE COLLECTIVE DESCRIPTION FOR MATERIAL, IRRESPECTIVE OF ITS FORM, WHICH CONSTITUTES CHILD ABUSE MATERIAL OR CHILD PORNOGRAPHY MATERIAL.

CHILD PORNOGRAPHY MATERIAL DEPICTS, OR IS A REPRESENTATION OF, A PERSON WHO IS, OR APPEARS TO BE, UNDER 18 YEARS OF AGE AND WHO IS, OR APPEARS TO BE, ENGAGED IN A SEXUAL POSE OR SEXUAL ACTIVITY, OR IS IN THE PRESENCE OF A PERSON WHO IS, OR APPEARS TO BE ENGAGED IN, A SEXUAL POSE OR ACTIVITY, AND DOES THIS IN A WAY THAT A REASONABLE PERSON WOULD, IN ALL THE CIRCUMSTANCES, REGARD AS BEING OFFENSIVE.

GROOMING GENERALLY REFERS TO BEHAVIOR THAT MAKES IT EASIER FOR AN OFFENDER TO PROCURE A CHILD FOR SEXUAL ACTIVITY. FOR EXAMPLE, AN OFFENDER MIGHT BUILD A RELATIONSHIP OF TRUST WITH THE CHILD, AND THEN SEEK TO MAKE THAT RELATIONSHIP A SEXUAL ONE (FOR EXAMPLE BY ENCOURAGING ROMANTIC FEELINGS OR EXPOSING THE CHILD TO SEXUAL CONCEPTS THROUGH PORNOGRAPHY).

ONLINE GROOMING CAN OCCUR WHEN A PERSON SENDS AN ELECTRONIC MESSAGE WITH INDECENT CONTENT TO A PERSON WHO THE SENDER BELIEVES TO BE LESS THAN 18 YEARS OF AGE, WITH THE INTENTION OF PROCURING THE RECIPIENT TO ENGAGE IN OR SUBMIT TO SEXUAL ACTIVITY WITH ANOTHER PERSON, INCLUDING BUT NOT NECESSARILY THE SENDER.

INTRODUCTION

ALL CLUB HOTEL DOLPHIN AMBASSADORS WILL CONDUCT THEMSELVES IN A MANNER, WHICH ENSURES CHILDREN'S RIGHTS AND NEEDS, ARE ALWAYS GIVEN PRIORITY. CHILDREN ARE OFTEN AT RISK FROM ABUSE AND EXPLOITATION FROM A VARIETY OF SOURCES. IT IS THE RESPONSIBILITY OF CLUB HOTEL DOLPHIN AMBASSADORS TO MINIMIZE THIS RISK BY PROMOTING AND BEING EXAMPLES OF GOOD PRACTICE IN IDENTIFYING AND MANAGING POTENTIAL RISKS. THE CODE OF CONDUCT DESCRIBES THE BASIC EXPECTATIONS OF CLUB HOTEL DOLPHIN AMBASSADORS REGARDING THEIR CONTACT AND DEALINGS WITH CHILDREN.

CLUB HOTEL DOLPHIN RECOGNIZES THAT EACH COUNTRY HAS ITS OWN LEGAL SYSTEM. THIS POLICY AND THESE STANDARDS MUST BE INTERPRETED AND ENFORCED IN ACCORDANCE WITH LOCAL LAW.

THERE MAY BE INSTANCES WHERE THE POLICY AND STANDARDS ARE MORE STRINGENT THAN LOCAL LAW, AND IN THESE CASES THE CLUB HOTEL DOLPHIN POLICY SHOULD BE FOLLOWED.

CORE OBLIGATIONS

CLUB HOTEL DOLPHIN WILL ACT AT ALL TIMES TO ENSURE CHILDREN'S SAFETY AND PROTECTION. CLUB HOTEL DOLPHIN VALUES ITS STAFF, MANAGERS, AND VENDORS AND WILL SUPPORT THEIR ACTIVE CONTRIBUTION TO ACHIEVING THIS GOAL.

CLUB HOTEL DOLPHIN AMBASSADORS WILL:

- MAINTAIN AND PROMOTE A SAFE ENVIRONMENT FOR CHILDREN TO PARTICIPATE IN CLUB HOTEL DOLPHIN' ACTIVITIES
- ORGANIZE WORK TO MINIMIZE THE RISK OF ALL FORMS OF CHILD ABUSE AND EXPLOITATION AND ACCIDENTAL HARM TO CHILDREN
- TAKE ACTION TO INFORM THEMSELVES AND OTHERS ON THE RIGHTS OF THE CHILD AND SPECIFICALLY CHILD PROTECTION
- TREAT ALL CHILDREN WITH THE HIGHEST STANDARDS OF RESPECT AND COURTESY
- LISTEN TO CHILDREN
- BE AWARE OF HOW THEIR INTERACTIONS WITH CHILDREN MAY BE SEEN BY THE CHILDREN THEMSELVES AND OTHERS

- ESTABLISH A CULTURE THAT EMPOWERS CHILDREN, THEIR FAMILIES AND COMMUNITIES TO BE KNOWLEDGEABLE OF THEIR RIGHTS, TO KNOW WHAT IS ACCEPTABLE AND UNACCEPTABLE AND TO KNOW WHAT THEY CAN DO WHEN THERE ARE PROBLEMS
- IMMEDIATELY REPORT ANY ALLEGATIONS OR SUSPICIONS OF CHILD ABUSE TO THE GENERAL MANAGER AND / OR RESIDENT MANAGER
- RESPOND SWIFTLY AND IN CONFIDENCE TO ANY SUCH ALLEGATIONS
- CONDUCT THEMSELVES IN A MANNER THAT IS CONSISTENT WITH CLUB HOTEL DOLPHIN' CULTURE AND VALUES

IN ADDITION, CLUB HOTEL DOLPHIN AMBASSADORS WILL:

- BE KNOWLEDGEABLE OF LOCAL CUSTOMS, PRACTICES AND BEHAVIORS
- CONSIDER CHILDREN'S HEALTH, SAFETY AND WELL-BEING, AND THEIR BEST INTERESTS, AS PARAMOUNT
- NOT CONDONE OR PARTICIPATE IN BEHAVIOR INVOLVING CHILDREN WHICH IS ILLEGAL, UNSAFE OR ABUSIVE
- AVOID BEING PLACED IN COMPROMISING OR VULNERABLE POSITIONS
- NOT DISCRIMINATE AGAINST OR SHOW FAVOR TO PARTICULAR CHILDREN
- NOT USE THEIR POSITION OF AUTHORITY INAPPROPRIATELY
- NOT USE THEIR RELATIONSHIP WITH CHILDREN TO OBTAIN INAPPROPRIATE FAVORS
- REALIZE THAT THEY ARE ALWAYS THE RESPONSIBLE PARTIES, EVEN IF A CHILD BEHAVES INAPPROPRIATELY
- NOT BEHAVE IN A WAY WHEREBY THEIR ACTIONS (PHYSICAL, VERBAL OR OTHERWISE) ARE OR COULD BE PERCEIVED AS OFFENSIVE, INAPPROPRIATE, ABUSIVE, NEGLECTFUL OR EXPLOITATIVE
- WHERE POSSIBLE AND PRACTICAL, NOT SPEND TIME ALONE WITH CHILDREN WHO ARE NOT MEMBERS OF THEIR IMMEDIATE OR EXTENDED FAMILY, IN THEIR HOMES, PROJECT PREMISES OR ELSEWHERE
- NOT PROVIDE SHELTER FOR CHILDREN IN THEIR HOMES UNLESS IN THE CASE OF EXTREME EMERGENCY

ANY BREACH OF THE CODE OF CONDUCT CAN LEAD TO DISMISSAL FROM EMPLOYMENT OR SERVICE AND MAY RESULT IN LEGAL PROCEEDINGS

CORE PRINCIPLES

THE FOLLOWING SIX CORE PRINCIPLES ARE SPECIFICALLY ADOPTED AS PART OF THIS POLICY, AND WILL BE INCORPORATED INTO ALL RELEVANT DOCUMENTS AND AGREEMENTS ENTERED INTO OR ADOPTED BY CLUB HOTEL DOLPHIN:

- ALL FORMS OF ABUSE AND EXPLOITATION OF CHILDREN BY ASSOCIATES OR WORKERS RELATED TO CLUB HOTEL DOLPHIN, CONSTITUTE ACTS OF GROSS MISCONDUCT AND ARE THEREFORE GROUNDS FOR TERMINATION OF EMPLOYMENT
- WHERE A CLUB HOTEL DOLPHIN ASSOCIATES OR THIRD PARTY WORKERS DEVELOPS CONCERNS OR SUSPICIONS REGARDING ANY TYPE OF CHILD ABUSE OR EXPLOITATION SHE / HE MUST REPORT SUCH CONCERNS VIA ESTABLISHED AGENCY REPORTING MECHANISMS.
- CLUB HOTEL DOLPHIN ASSOCIATES OR THIRD PARTY WORKERS ARE OBLIGED TO CREATE AND MAINTAIN AN ENVIRONMENT THAT PREVENTS ALL FORMS OF ABUSE AND EXPLOITATION OF CHILDREN AND PROMOTES THE IMPLEMENTATION OF THE CLUB HOTEL DOLPHIN CODE OF CONDUCT. MANAGERS AT ALL LEVELS HAVE PARTICULAR RESPONSIBILITIES TO SUPPORT AND DEVELOP SYSTEMS THAT MAINTAIN THIS ENVIRONMENT
- SEXUAL ACTIVITY WITH CHILDREN (PERSONS UNDER THE AGE OF 18) IS PROHIBITED REGARDLESS OF THE AGE OF MAJORITY OR AGE OF CONSENT LOCALLY. MISTAKEN BELIEF IN THE AGE OF A CHILD IS NOT A DEFENSE.
- EXCHANGE OF MONEY, EMPLOYMENT, GOODS, OR SERVICES FOR SEX, INCLUDING SEXUAL FAVORS OR OTHER FORMS OF HUMILIATING, DEGRADING, OR EXPLOITATIVE BEHAVIOR IS PROHIBITED. THIS INCLUDES EXCHANGE OF ASSISTANCE THAT IS DUE TO BENEFICIARIES
- SEXUAL RELATIONSHIPS BETWEEN CLUB HOTEL DOLPHIN ASSOCIATES OR THIRD PARTY WORKERS AND BENEFICIARIES (BOTH ADULTS AND CHILDREN) ARE PROHIBITED SINCE THEY ARE BASED ON INHERENTLY UNEQUAL POWER DYNAMICS.

SUCH RELATIONSHIPS UNDERMINE THE CREDIBILITY AND INTEGRITY OF CLUB HOTEL DOLPHIN ASSOCIATES OR THIRD PARTY WORKERS.



CHILD PROTECTION POLICY

CHILD PROTECTION PROCEDURES

ORGANISATIONAL AWARENESS AND ADVOCACY

ALL CLUB HOTEL DOLPHIN AMBASSADORS WILL BE INFORMED OF CLUB HOTEL DOLPHIN' CHILD PROTECTION POLICIES AND COMPLIANCE WITH THEM IS EXPECTED. ANY BREACH IS TREATED WITH THE UTMOST SERIOUSNESS AND WILL BE INVESTIGATED AND DEALT WITH ACCORDINGLY.

CHILD PROTECTION AWARENESS WILL BE INCLUDED AT ALL STAGES OF CLUB HOTEL DOLPHIN OPERATIONS INCLUDING THE HIRING, ORIENTATION AND TRAINING OF ALL ASSOCIATES WHO WILL COME INTO CONTACT WITH CHILDREN AT ALL LEVELS.

CLUB HOTEL DOLPHIN WILL ENSURE THAT ALL CLUB HOTEL DOLPHIN ASSOCIATES HAVE READ AND ARE AWARE OF THIS POLICY. ANY CHANGES MADE TO THE POLICY WILL BE COMMUNICATED IMMEDIATELY.

RECRUITMENT

CLUB HOTEL DOLPHIN IS COMMITTED TO CHILD SAFE RECRUITMENT, SELECTION AND SCREENING PRACTICES. ALL CLUB HOTEL DOLPHIN AMBASSADORS WILL BE INFORMED OF THIS POLICY DURING THE RECRUITMENT PROCESS. ALL EMPLOYEES AND VOLUNTEERS WILL BE REQUIRED TO SIGN AN ACKNOWLEDGEMENT THAT THEY HAVE BOTH READ THIS POLICY AND WILL COMPLY WITH ITS REQUIREMENTS.

WHERE CLUB HOTEL DOLPHIN DETERMINES IT IS NECESSARY OR APPROPRIATE, EMPLOYEES AND VOLUNTEERS, PARTICULARLY THOSE WHO CONDUCT WORK THAT BRINGS THEM INTO DIRECT CONTACT WITH CHILDREN, MUST PROVIDE A "WORKING WITH CHILDREN" OR SIMILAR CLEARANCE FROM THE APPLICABLE REGULATOR AND/OR ASSIST CLUB HOTEL DOLPHIN TO MAKE BACKGROUND CHECKS, WHICH MAY INCLUDE POLICE OR CRIMINAL HISTORY CHECKS. ALL STAFF WILL BE REQUIRED TO PROVIDE ORIGINAL PROOF OF IDENTITY DOCUMENTS SUCH AS A BIRTH CERTIFICATE, PASSPORT, DRIVER'S LICENSE, AND RELEVANT QUALIFICATIONS, WHEN REQUESTED BY CLUB HOTEL DOLPHIN TO DO SO.



CHILD PROTECTION POLICY

CLUB HOTEL DOLPHIN MAY REFUSE TO EMPLOY, OR TERMINATE THE EMPLOYMENT OF, ANY PERSON WHO IT REASONABLY BELIEVES MAY POSE A RISK TO CHILDREN.

TRAINING

THIS POLICY WILL BE MADE AVAILABLE TO ALL STAFF AND OTHERS VISITING OR INVOLVED WITH CLUB HOTEL DOLPHIN PROJECTS. IT IS THE RESPONSIBILITY OF THE HUMAN RESOURCES MANAGER TO ENSURE THAT ALL CLUB HOTEL DOLPHIN DEPARTMENTS, HAVE A COPY OF AND THAT ALL CLUB HOTEL DOLPHIN STAFF ARE AWARE OF, AND TRAINED ON, THIS POLICY.

THE GENERAL MANAGER WILL NOMINATE A PERSON IN EACH DEPARTMENT RESPONSIBLE FOR ENSURING THAT ALL THEIR ASSOCIATES ADHERE TO THIS POLICY. IN SITUATIONS WHERE ANY PART OF THE POLICY IS IN CONFLICT WITH LOCAL LAW, THAT RESPONSIBLE PERSON MUST BRING THIS TO THE ATTENTION OF THE GENERAL MANAGER.

STAFF WILL BE MADE AWARE OF THE IMPORTANCE OF THEIR OWN RESPONSIBILITY IN THE UPHOLDING AND IMPLEMENTATION OF THIS POLICY. ANY VIOLATION OF THE POLICY (INCLUDING ANY SUSPECTED OR KNOWN ABUSE OR EXPLOITATION) MUST BE REPORTED DIRECTLY TO THE GENERAL MANAGER.

MARKETING AND PRINTED MATERIAL

CLUB HOTEL DOLPHIN UNDERTAKES ALL REASONABLE PRECAUTIONS TO PROTECT PAPER AND ELECTRONIC INFORMATION ABOUT CHILDREN. AT ALL TIMES STAFF ARE REQUIRED TO ADHERE TO CLUB HOTEL DOLPHIN' POLICIES IN RELATION TO PRIVACY AND PHOTOGRAPHY – USE OF IMAGE.

ALL COMMUNICATIONS INVOLVING CHILDREN MUST USE PICTURES AND TEXT THAT ARE DECENT AND RESPECTFUL.

ALLEGATION REPORTING, MANAGEMENT AND INVESTIGATION

CLUB HOTEL DOLPHIN IS COMMITTED TO DOING ALL IT POSSIBLY CAN TO PREVENT THE ABUSE OF CHILDREN AND TO HOLD ACCOUNTABLE ALL THOSE WHO DO.

ALL CLUB HOTEL DOLPHIN AMBASSADORS ARE REQUIRED TO REPORT IMMEDIATELY TO THE CHIEF EXECUTIVE

OFFICER ANY:

- DISCLOSURE OR ALLEGATION FROM A CHILD OR COMMUNITY MEMBER OR CLUB HOTEL DOLPHIN ASSOCIATES REGARDING THE SAFETY, ABUSE OR EXPLOITATION OF A CHILD
- OBSERVATION OF CONCERNING BEHAVIOR BY ANY CLUB HOTEL DOLPHIN ASSOCIATES THAT BREACHES THIS POLICY OR THE CHILD PROTECTION CODE OF CONDUCT
- INAPPROPRIATE USE OF CLUB HOTEL DOLPHIN' TECHNOLOGY, INCLUDING COMPUTERS AND PHOTOGRAPHIC EQUIPMENT
- PERSON ENGAGING IN SUSPICIOUS BEHAVIOR THAT COULD BE ASSOCIATED WITH CHILD ABUSE OR EXPLOITATION OR TRAFFICKING

IF A PERSON KNOWINGLY CHOOSES NOT TO REPORT AN INCIDENT OR ANY SUSPICION OF CHILD ABUSE OR EXPLOITATION, THEN THEY WILL BE REMOVED FROM ANY ASSOCIATION WITH CLUB HOTEL DOLPHIN.

THE GENERAL MANAGER WILL CONDUCT AN INVESTIGATION IN A TIMELY AND THOROUGH MANNER, AND MAY REQUIRE THE ASSISTANCE OF OUTSIDE LEGAL,

MEDIATION, OR OTHER EXPERT ADVICE. THE INVESTIGATION AND ITS OUTCOMES WILL BE APPROPRIATELY DOCUMENTED.

THE INVESTIGATION MAY REQUIRE THE INTERVIEW OF THE PERSON MAKING AN ALLEGATION, OTHER WITNESSES AND THE PERSON WHO IS ALLEGED TO HAVE BEEN INVOLVED IN THE INCIDENT OR IS THE SUBJECT OF THE SUSPICION. THE MATTER MAY BE REFERRED TO LOCAL POLICE OR OTHER AUTHORITIES IF IT IS CONSIDERED TO INVOLVE CRIMINAL BEHAVIOR.

CLUB HOTEL DOLPHIN WILL TREAT ALL CONCERNS RAISED SERIOUSLY AND TREAT ALL PARTIES INVOLVED FAIRLY. ALL REPORTS WILL BE HANDLED PROFESSIONALLY, CONFIDENTIALLY AND EXPEDIENTLY. ALL REPORTS, THE NAMES OF PEOPLE INVOLVED AND THE DETAILS WILL REMAIN CONFIDENTIAL AND ANY DISCLOSURE WILL BE ON A "NEED TO KNOW" BASIS OR WHEN REQUIRED BY RELEVANT LOCAL OR SRI LANKAN LAW OR WHEN POLICE OR CHILD PROTECTION AUTHORITIES ARE NOTIFIED OF THE INCIDENT OR ALLEGATION.

ALL REPORTS MADE IN GOOD FAITH WILL BE VIEWED AS BEING MADE IN THE BEST INTERESTS OF THE CHILD REGARDLESS OF THE OUTCOMES OF ANY INVESTIGATION. CLUB HOTEL DOLPHIN WILL ENSURE THAT THE INTERESTS OF THE CLUB HOTEL DOLPHIN ASSOCIATES REPORTING CHILD ABUSE IN GOOD FAITH ARE PROTECTED. ANY CLUB HOTEL DOLPHIN ASSOCIATES, WHO INTENTIONALLY MAKE FALSE OR MALICIOUS ALLEGATIONS, WILL FACE DISCIPLINARY ACTION.

THE RIGHTS AND WELFARE OF THE CHILD IS OF PRIME IMPORTANCE. EVERY EFFORT WILL BE MADE TO PROTECT THE RIGHTS AND SAFETY OF THE CHILD THROUGHOUT ANY INVESTIGATION.

DURING AN INVESTIGATION, THE BEST INTERESTS OF THE CHILD MAY WARRANT THE STANDING DOWN OF A CLUB HOTEL DOLPHIN ASSOCIATES. ANY STAFF MEMBER STOOD DOWN IN THIS MANNER WILL CONTINUE TO RECEIVE FULL PAY - RECOGNIZING THAT THE MEMBER IS ENTITLED TO A FAIR PROCESS THAT DOES NOT PRE-JUDGE THE OUTCOME OF ANY INVESTIGATION.

CLUB HOTEL DOLPHIN IS COMMITTED TO THE SAFETY AND WELL BEING OF ALL CHILDREN. WE SUPPORT THE RIGHTS OF CHILDREN AND WILL ACT WITHOUT HESITATION TO ENSURE A CHILD SAFE ENVIRONMENT IS MAINTAINED.

WE ARE COMMITTED TO THE PROTECTION OF CHILDREN FROM HARM, ABUSE, AND EXPLOITATION. CHILDREN HAVE A RIGHT TO SURVIVAL, DEVELOPMENT, PROTECTION, AND PARTICIPATION AS STATED IN THE UNITED NATIONS CONVENTION ON THE RIGHTS OF THE CHILD (UNCRC). CLUB HOTEL DOLPHIN WILL UPHOLD THESE RIGHTS.

CLUB HOTEL DOLPHIN TAKES ITS DUTY OF CARE SERIOUSLY AND WILL AIM AT ALL TIMES TO PROVIDE THE SAFEST POSSIBLE PROGRAMS AND ENVIRONMENTS FOR CHILDREN. THIS WILL BE ACHIEVED BY IDENTIFYING AND MANAGING RISKS THAT MAY LEAD TO HARM.

THIS POLICY APPLIES TO ALL STAFF AND OTHER KEY GROUPS. 'STAFF' REFERS TO: FULL TIME, PART TIME, INTERNATIONAL AND NATIONAL AND ALSO THOSE ENGAGED ON SHORT TERM CONTRACTS SUCH AS: CONSULTANCIES, PHOTOGRAPHERS ETC. 'OTHERS' REFERS TO: VOLUNTEERS, VISITORS, BOARD MEMBERS, TRUSTEES, STAFF IN PARTNERSHIP AGENCIES, AND ANY OTHER INDIVIDUALS OR GROUPS THAT HAVE CONTACT WITH THE ORGANIZATION.

- THIS CPP HAS BEEN DEVELOPED TO PROVIDE A PRACTICAL GUIDE TO PREVENT CHILD ABUSE IN CLUB HOTEL DOLPHIN'S PROGRAMS. IT OUTLINES A RANGE OF RISK MANAGEMENT STRATEGIES, WHICH WILL REDUCE THE RISK OF CHILDREN BEING HARMED;
- THE CPP AIMS TO EDUCATE STAFF AND OTHERS ABOUT CHILD ABUSE AND PROMOTE A CHILD SAFE AND A CHILD FRIENDLY CULTURE WHERE EVERYONE IS COMMITTED TO KEEPING CHILDREN SAFE;
- THE CPP AIMS TO CREATE AN OPEN AND AWARE ENVIRONMENT WHERE CONCERNS FOR THE SAFETY AND WELL BEING OF A CHILD CAN BE RAISED AND MANAGED IN A FAIR AND JUST MANNER, WHICH PROTECTS THE RIGHTS OF ALL;
- CLUB HOTEL DOLPHIN IS OBLIGED TO ADHERE TO LOCAL AND INTERNATIONAL CHILD PROTECTION CRIMINAL LAWS, WHICH PROHIBIT THE ABUSE AND EXPLOITATION OF CHILDREN. THESE INCLUDE LOCAL LAWS WHERE CLUB HOTEL DOLPHIN PROGRAMS EXIST, AND INTERNATIONAL LAWS AND CONVENTIONS IN RELATION TO ALL FORMS OF CHILD ABUSE AND CHILD EXPLOITATION, INCLUDING: CHILD SEX TOURISM, CHILD SEX TRAFFICKING, CHILD LABOUR AND CHILD PORNOGRAPHY;

CLUB HOTEL DOLPHIN ABIDES BY THE FOLLOWING PRINCIPLES:

- CLUB HOTEL DOLPHIN BELIEVES THAT ANY FORM OF CHILD ABUSE AND EXPLOITATION IS UNACCEPTABLE AND WILL NOT BE TOLERATED;
- UNCRC IS THE UNIVERSAL FOUNDATION FOR CHILD PROTECTION. THE FUNDAMENTAL PRINCIPLE OF THE CONVENTION IS THAT CHILDREN HAVE THEIR OWN INDIVISIBLE RIGHTS;
- CLUB HOTEL DOLPHIN BELIEVES THAT ALL CHILDREN HAVE A RIGHT TO BE SAFE AT ALL TIMES, AND WE HAVE AN OBLIGATION TO PROVIDE SAFE AND PROTECTIVE SERVICES AND ENVIRONMENTS;
- CLUB HOTEL DOLPHIN RECOGNISES ITS DUTY OF CARE TO TAKE ALL REASONABLE STEPS TO ENSURE THAT CHILDREN ARE SAFE FROM HARM;
- CLUB HOTEL DOLPHIN WILL TAKE PROACTIVE STEPS TO CREATE CHILD SAFE AND CHILD FRIENDLY PROGRAMS;
- ADHERENCE TO THIS CPP IS A MANDATORY REQUIREMENT FOR ALL STAFF AND OTHERS;
- CLUB HOTEL DOLPHIN WILL ENSURE THAT ALL STAFF AND RELEVANT STAKEHOLDERS ARE MADE AWARE OF THE CPP AND THEIR RESPONSIBILITIES;
- ALL DECISIONS REGARDING THE WELFARE AND PROTECTION OF CHILDREN ARE MADE BASED ON THE BEST INTERESTS OF THE CHILD PRINCIPLE. THIS PRINCIPLE REFERS TO DECISIONS CONSIDERING THAT THE CHILD RECEIVES MAXIMUM BENEFIT POSSIBLE FROM SERVICES PROVIDED, AND THAT THE POSITIVE IMPACTS OF ANY COURSE OF ACTION OUTWEIGH ANY NEGATIVE IMPACTS;
- WHERE POSSIBLE, CHILDREN WILL BE CONSULTED IN THE DEVELOPMENT OF THE CPP AND THE IMPLEMENTATION OF CHILD SAFE PRACTICES;
- CHILDREN IN OUR PROGRAMS SHOULD BE GIVEN OPPORTUNITIES TO EXPRESS THEIR VIEWS ON MATTERS AFFECTING THEM;
- CLUB HOTEL DOLPHIN BELIEVES THAT ALL CHILDREN SHOULD BE EQUALLY PROTECTED AND ASSISTED REGARDLESS OF THEIR GENDER, NATIONALITY, RELIGIOUS OR POLITICAL BELIEFS, FAMILY BACKGROUND, ECONOMIC STATUS, PHYSICAL OR MENTAL HEALTH OR CRIMINAL BACKGROUND.

CONTEXT

CHILD ABUSE IS A GLOBAL PROBLEM THAT AFFECTS BOTH BOYS AND GIRLS. CHILDREN ARE ABUSED PHYSICALLY, SEXUALLY, EMOTIONALLY, AND THROUGH NEGLECT. CHILDREN ARE FORCED TO ENDURE THE MOST HAZARDOUS FORMS OF CHILD LABOUR INCLUDING SWEATSHOPS AND PROSTITUTION. IN SOME COUNTRIES BOYS ARE KIDNAPPED AND FORCED INTO ARMED CONFLICT AS SOLDIERS. IN MANY COUNTRIES CHILDREN EXPERIENCE SEVERE CORPORAL PUNISHMENT IN SCHOOLS. CHILDREN LIVING IN POVERTY ARE MORE AT RISK OF CHILD ABUSE AND EXPLOITATION.

- ACCORDING TO THE WORLD HEALTH ORGANISATION (2001) FORTY MILLION CHILDREN BELOW THE AGE OF 15 SUFFER FROM ABUSE AND NEGLECT AND REQUIRE SOCIAL AND HEALTH CARE.
- AN ESTIMATED 1.2 MILLION CHILDREN ARE TRAFFICKED EVERY YEAR. (EVERY CHILD COUNTS, NEW ESTIMATES ON CHILD LABOUR, INTERNATIONAL LABOUR ORGANISATION APRIL, 2002; UNICEF 2007)
- 250 MILLION CHILDREN ARE INVOLVED IN CHILD LABOUR, MORE THAN 180 MILLION ARE WORKING IN HAZARDOUS SITUATION OR CONDITIONS. (A FUTURE WITHOUT CHILD LABOR, INTERNATIONAL LABOUR ORGANISATION, 2002)
- 1 IN 4 FEMALES AND 1 IN 7 GIRLS WILL EXPERIENCE SOME FORM OF SEXUAL ABUSE IN THEIR CHILDHOOD.

DEFINITIONS OF ABUSE

IN PARTICULAR, CLUB HOTEL DOLPHIN IS COMMITTED TO SAFEGUARDING THE CHILDREN IN OUR CARE FROM:

SEXUAL ABUSE

SEXUAL ABUSE IS ANY ACT IN WHICH A PERSON WITH POWER OR AUTHORITY OVER A CHILD (FEMALE OR MALE) USES A CHILD FOR SEXUAL GRATIFICATION. AN ABUSER CAN BE AN ADULT, ADOLESCENT, OR OLDER CHILD.

SEXUAL ABUSE SPANS A RANGE OF CONTACT AND NON-CONTACT BEHAVIOR. NON-CONTACT BEHAVIOUR INCLUDES:

- MAKING SEXUAL COMMENTS (IN PERSON, IN LETTERS, BY TELEPHONE, TEXT MESSAGES OR EMAIL)
- VOYEURISM – INCLUDING COMMENTING ON PHYSICAL ATTRACTIVENESS
- EXPOSING A CHILD TO PORNOGRAPHY
- NUDITY – AN ABUSER EXPOSING PARTS OF THEIR BODY OR THE CHILD'S BODY CONTACT BEHAVIOUR INCLUDES:
 - FONDLING OR KISSING
 - SEXUAL PENETRATION
 - EXPLOITING A CHILD THROUGH PROSTITUTION

PHYSICAL ABUSE

PHYSICAL ABUSE OCCURS WHEN A PARENT OR CAREGIVER SUBJECTS A CHILD TO NON-ACCIDENTAL PHYSICALLY AGGRESSIVE ACTS. THE ABUSER MAY INFLICT AN INJURY INTENTIONALLY OR INADVERTENTLY AS A RESULT OF PHYSICAL PUNISHMENT OR THE AGGRESSIVE TREATMENT OF A CHILD. PHYSICALLY ABUSIVE BEHAVIOUR INCLUDES (BUT IS NOT LIMITED TO) SHOVING, HITTING, SLAPPING, SHAKING, THROWING, PUNCHING, BITING, BURNING, AND KICKING.

EMOTIONAL OR PSYCHOLOGICAL ABUSE

EMOTIONAL OR PSYCHOLOGICAL ABUSE OCCURS WHEN A CAREGIVER OR PARENT REPEATEDLY REJECTS OR THREATENS A CHILD. OFTEN THERE IS A PATTERN OF EMOTIONAL OR PSYCHOLOGICAL ABUSE, RATHER THAN A SINGLE INCIDENT. SUCH ABUSE MAY INVOLVE HUMILIATING, TERRORISING, NAME-CALLING, BELITTLEMENT, INAPPROPRIATE SYMBOLIC ACTS OR CONTINUAL COLDNESS FROM THE CAREGIVER OR PARENT, TO AN EXTENT THAT RESULTS IN SIGNIFICANT DAMAGE TO THE CHILD'S PHYSICAL, INTELLECTUAL OR EMOTIONAL WELLBEING AND DEVELOPMENT.

NEGLECT

NEGLECT OCCURS WHEN A PARENT OR CAREGIVER FAILS TO PROVIDE A CHILD WITH THE BASIC NECESSITIES OF LIFE. SUCH NEGLECT INCLUDES THE FAILURE TO PROVIDE ADEQUATE FOOD, CLOTHING, SHELTER, MEDICAL ATTENTION, OR SUPERVISION TO THE EXTENT THAT THE CHILD'S HEALTH AND DEVELOPMENT IS, OR IS LIKELY TO BE, SIGNIFICANTLY HARMED.

WITNESSING FAMILY VIOLENCE

WITNESSING FAMILY VIOLENCE IS A SPECIFIC FORM OF EMOTIONAL OR PSYCHOLOGICAL ABUSE. FAMILY VIOLENCE IS DEFINED AS VIOLENCE BETWEEN MEMBERS OF A FAMILY OR EXTENDED FAMILY OR THOSE FULFILLING THE ROLE OF FAMILY IN A CHILD OR YOUNG PERSON'S LIFE. EXPOSURE TO FAMILY VIOLENCE PLACES CHILDREN AND YOUNG PEOPLE AT INCREASED RISK OF PHYSICAL INJURY AND HARM AND HAS A SIGNIFICANT IMPACT ON THEIR WELLBEING AND DEVELOPMENT.

CHILD PROTECTION RISK MANAGEMENT

- CLUB HOTEL DOLPHIN RECOGNISES THAT THERE ARE A NUMBER OF POTENTIAL RISKS TO CHILDREN IN THE DELIVERY OF OUR PROGRAMS TO THE VULNERABLE AND DISADVANTAGED. IN RECOGNIZING THESE RISKS, CLUB HOTEL DOLPHIN PROACTIVELY ASSESSES AND MANAGES THESE RISKS TO CHILDREN (AND IN THE COMMUNITIES IN WHICH WE WORK) TO REDUCE THE RISK OF HARM. THIS IS ACHIEVED BY EXAMINING EACH AREA AND ITS POTENTIAL IMPACT ON CHILDREN;
- AREAS THAT INVOLVE DIRECT WORK WITH CHILDREN ARE CONSIDERED A HIGHER RISK, AND THEREFORE REQUIRE MORE STRINGENT CHILD PROTECTION PROCEDURES. HOWEVER, AS CHILDREN ARE PART OF EVERY COMMUNITY IN WHICH WE WORK, WE ARE ALWAYS MINDFUL OF POTENTIAL RISKS;
- RISK MANAGEMENT IS AN ONGOING PART OF EVERY ACTIVITY, AND CLUB HOTEL DOLPHIN CONDUCTS A CHILD PROTECTION RISK ASSESSMENT ON EVERY NEW AND EMERGING AREA AND PROJECT, INCLUDED IN THE PROJECT MANAGEMENT CYCLE;
- STAFF AND OTHERS SHOULD CONTINUALLY BE AWARE OF RISKS, AND BE ACTIVELY MINIMIZING OPPORTUNITIES AND SITUATIONS WHERE CHILDREN CAN BE HARMED;
- A CHILD ABUSE INCIDENT REPORTING SHEET HAS BEEN DEVELOPED AND STAFF IS AWARE OF ITS EXISTENCE.

USE OF CHILDREN'S IMAGES

CLUB HOTEL DOLPHIN WILL AT ALL TIMES PORTRAY CHILDREN IN A RESPECTFUL, APPROPRIATE, AND CONSENSUAL WAY.

OUR GUIDELINES ON THE USE OF CHILDREN'S IMAGES, IN LINE WITH THE FOLLOWING:

- A CHILD SHOULD ALWAYS BE PORTRAYED IN A DIGNIFIED AND RESPECTFUL MANNER AND NOT IN A VULNERABLE OR SUBMISSIVE MANNER;
- CHILDREN SHOULD BE ADEQUATELY CLOTHED AND NOT IN POSES THAT COULD BE SEEN AS SEXUALLY SUGGESTIVE;
- A CHILD AND ITS FAMILY MUST ALWAYS BE ASKED FOR CONSENT WHEN USING THEIR IMAGES. WHEN ASKING FOR CONSENT TO USE THE IMAGE, DETAILS SHOULD BE GIVEN AS TO HOW AND WHERE THIS IMAGE WILL BE USED;
- THERE SHOULD BE NO IDENTIFYING INFORMATION OF THE CHILD USED IN THE PUBLICATION OF IMAGES WITH THEIR LOCATION;
- LOCAL CULTURAL TRADITIONS SHOULD BE ASSESSED REGARDING RESTRICTIONS FOR REPRODUCING PERSONAL IMAGES;
- IMAGES SHOULD BE AN HONEST REPRESENTATION OF THE CONTEXT AND THE FACTS;
- WHEN SENDING IMAGES ELECTRONICALLY, FILE LABELS SHOULD NOT REVEAL IDENTIFYING INFORMATION;
- ALL PHOTOGRAPHERS WILL BE SCREENED FOR THEIR SUITABILITY, INCLUDING POLICE CHECKS WHERE APPROPRIATE.
- VOLUNTEERS ARE NOT TO PUT ANY PHOTOS ON FACEBOOK OR OTHER FORMS OF SOCIAL MEDIA OR USE THEM FOR ANY COMMERCIAL/PROMOTIONAL PURPOSES. PLEASE SEND ANY PHOTOS YOU TAKE WHILST VOLUNTEERING TO CLUB HOTEL DOLPHIN SO WE CAN SHARE THESE (WHERE PERMISSION IS GRANTED).

EMPLOYMENT OF STAFF

CLUB HOTEL DOLPHIN IS COMMITTED TO CHILD SAFE RECRUITMENT, SELECTION AND SCREENING PRACTICES. THESE PRACTICES AIM TO RECRUIT THE SAFEST AND MOST SUITABLE PEOPLE TO WORK IN OUR AREAS.

OUR CHILD SAFE PRACTICES INCLUDE:

- PROMOTING OUR CHILD SAFE COMMITMENT ON OUR WEBSITE, IN OTHER PROMOTIONAL MATERIALS AND IN ALL JOB ADVERTISEMENTS;
- ALL APPLICANTS WILL BE MADE AWARE OF CLUB HOTEL DOLPHIN'S CPP AND BE INFORMED OF THE RECRUITMENT SCREENING REQUIREMENTS;
- ALL POSITIONS WILL BE ASSESSED FOR THE LEVEL FOR RISK IN RELATION TO CONTACT WITH CHILDREN. POSITIONS WORKING DIRECTLY WITH CHILDREN WILL REQUIRE THE HIGHEST LEVEL OF SCREENING AND THE APPLICANT MUST POSSESS RELEVANT QUALIFICATIONS AND EXPERIENCE IN WORKING WITH CHILDREN;
- INTERVIEWS WILL BE CONDUCTED FOR ALL POSITIONS, IDEALLY FACE-TO-FACE, BUT TELEPHONE INTERVIEWS MAY BE NECESSARY IN THE INTERNATIONAL CONTEXT;
- BEHAVIORAL-BASED QUESTIONS WILL BE USED TO ASK FOR EXAMPLES OF THE CANDIDATE'S PAST BEHAVIOUR AND EXPERIENCES. IN POSITIONS WORKING DIRECTLY WORKING WITH CHILDREN, THE PANEL WILL EXPLORE THE CANDIDATE'S MOTIVATIONS FOR WORKING WITH CHILDREN, WHICH WILL INCLUDE VALUE-BASED QUESTIONS SEEKING INFORMATION ABOUT THE CANDIDATE'S ATTITUDES TO CHILDREN, PROFESSIONAL BOUNDARIES, ACCOUNTABILITY, TEAM WORK AND HOW THEY HAVE RESPONDED TO ETHICAL DILEMMAS;
- A MINIMUM OF TWO (2) REFERENCE CHECKS WILL BE REQUIRED FOR ALL PREFERRED CANDIDATES. THIS WOULD INCLUDE SHORT AND LONG TERMS POSITIONS, VOLUNTEERS ON PLACEMENT AND CONSULTANTS. THE CANDIDATE'S MOST RECENT EMPLOYER / SUPERVISOR MUST BE ONE OF THESE REFEREES. CLUB HOTEL DOLPHIN WILL VERIFY THE IDENTITY OF THE REFEREE AND MAKE DIRECT CONTACT WITH EACH OF THESE REFEREES. CLUB HOTEL DOLPHIN RESERVES THE RIGHT TO REQUEST ADDITIONAL REFERENCES;
- ALL STAFF AND ALL OTHERS INVOLVED WITH THE ORGANISATION WILL BE REQUIRED TO HAVE A POLICE CHECK;
- ALL STAFF ARE REQUIRED TO UNDERTAKE A WORKING WITH CHILDREN CHECK PRIOR TO THEIR COMMENCEMENT WITH CLUB HOTEL DOLPHIN;

CHILD PROTECTION POLICY

- ALL STAFF AND OTHERS ARE REQUIRED TO READ AND SIGN CLUB HOTEL DOLPHIN'S CPP PRIOR TO THEIR COMMENCEMENT AT CLUB HOTEL DOLPHIN;
- CLUB HOTEL DOLPHIN RESERVES THE RIGHT TO REFUSE EMPLOYMENT TO OR TERMINATE ANY PERSON'S EMPLOYMENT THAT MAY POSE A RISK TO CHILDREN.

CHILD ABUSE REPORTING PROCESS

CLUB HOTEL DOLPHIN CONSIDERS THE ABUSE AND EXPLOITATION OF CHILDREN TO BE COMPLETELY UNACCEPTABLE. WE WILL TAKE ALL CONCERNS AND REPORTS OF CHILD ABUSE SERIOUSLY AND ACT ON THESE REPORTS IMMEDIATELY.

IT IS MANDATORY FOR ALL CLUB HOTEL DOLPHIN STAFF AND OTHERS TO REPORT CONCERNS OR ALLEGATIONS OF CHILD ABUSE. THESE CONCERNS MAY RELATE TO A CHILD OR A STAFF MEMBER INVOLVED IN THE ORGANIZATION OR A CONCERN ABOUT A CHILD OR PERSON'S OUTSIDE OF THE ORGANIZATION'S PROGRAMS. IF YOU DO HAVE A CONCERN YOU SHOULD IMMEDIATELY FOLLOW CLUB HOTEL DOLPHIN'S CHILD ABUSE REPORTING PROCEDURES.

WHO SHOULD REPORT?

- ALL CLUB HOTEL DOLPHIN STAFF AND OTHERS, INCLUDING PEOPLE IN THE COMMUNITY AND PARTNER ORGANIZATIONS.

WHAT SHOULD BE REPORTED?

- ANY DISCLOSURE OR ALLEGATION FROM A CHILD / COMMUNITY MEMBER OR STAFF REGARDING THE SAFETY / ABUSE EXPLOITATION OF A CHILD;
- ANY OBSERVATION OR CONCERNING BEHAVIOUR EXHIBITED BY A CLUB HOTEL DOLPHIN STAFF, VOLUNTEER OR OTHER RELEVANT STAKEHOLDER THAT BREACHES THE CLUB HOTEL DOLPHIN CODE OF CONDUCT FOR WORKING WITH CHILDREN;
- INAPPROPRIATE USE OF THE ORGANISATION'S PHOTOGRAPHIC EQUIPMENT OR COMPUTERS INCLUDING EVIDENCE OF CHILD PORNOGRAPHY;
- STAFF ENGAGING IN SUSPICIOUS BEHAVIOUR THAT COULD BE ASSOCIATED WITH SEXUAL EXPLOITATION OR TRAFFICKING.

WHO TO REPORT TO?

- CHILD ABUSE REPORTS SHOULD BE MADE TO THE GENERAL MANAGER OR RESIDENT MANAGER.

REPORTING OF CHILD ABUSE ALLEGATIONS OVERSEAS

- CHILD ABUSE REPORTS SHOULD BE MADE TO THE GENERAL MANAGER OR RESIDENT MANAGER;
- A LOCAL REPORTING PROCEDURE WILL GUIDE THE PROCESS BASED ON WHETHER THE ALLEGATION CONSTITUTES A CRIMINAL OFFENCE IN THE COUNTRY, OR WHETHER IT IS A BREACH OF THE CLUB HOTEL DOLPHIN CODE OF CONDUCT AND WILL BE DEALT WITH AS A DISCIPLINARY MATTER;
- THE FIRST STEP WILL BE TO GATHER ALL THE RELEVANT INFORMATION AND ADDRESS ANY HEALTH AND PROTECTION NEEDS OF THE CHILD. THE MATTER MAY BE DIRECTLY REFERRED TO THE LOCAL POLICE AND OR AUTHORITIES IF THE ALLEGATIONS ARE CONSIDERED TO BE CRIMINAL OFFENCES;
- IF THE INCIDENT HAS OCCURRED OUTSIDE OF THE PROGRAM THE MATTER WILL BE REFEREED TO AN EXTERNAL BODY OR AGENCY DEALING WITH CHILD PROTECTION MATTERS IN THE COUNTRY.

WHEN TO REPORT?

- CHILD ABUSE CONCERNS SHOULD BE RAISED IMMEDIATELY.

HOW SHOULD IT BE REPORTED?

- VERBALLY AND BY COMPLETING THE CLUB HOTEL DOLPHIN CHILD ABUSE INCIDENT REPORTING SHEET.

WHAT WILL HAPPEN NEXT?

- THE GENERAL MANAGER AND RESIDENT MANAGER WILL DISCUSS THE ALLEGATIONS AND THEN DECIDE UPON THE NEXT STEP. THIS WILL INVOLVE EITHER:
- INTERVIEWING THE PERSON / PERSONS WHO MADE THE ALLEGATIONS OR OTHER WITNESSES TO GATHER MORE INFORMATION WITH WHICH TO MAKE A DECISION;
- REPORT TO LOCAL POLICE AND OR CHILD PROTECTION AUTHORITY;
- REPORT MADE TO THE SRI LANKAN POLICE;
- CONCERN HANDLED INTERNALLY IF IT IS NOT A CRIMINAL MATTER;
- NO FURTHER ACTION TAKEN.

- CLUB HOTEL DOLPHIN WILL TREAT ALL CONCERNS RAISED SERIOUSLY AND ENSURE THAT ALL PARTIES WILL BE TREATED FAIRLY AND THE PRINCIPLES OF NATURAL JUSTICE WILL BE A PRIME CONSIDERATION. ALL REPORTS WILL BE HANDLED PROFESSIONALLY, CONFIDENTIALLY AND EXPEDIENTLY;
- ALL REPORTS MADE IN GOOD FAITH WILL BE VIEWED AS BEING MADE IN THE BEST INTERESTS OF THE CHILD REGARDLESS OF THE OUTCOMES OF ANY INVESTIGATION. CLUB HOTEL DOLPHIN WILL ENSURE THAT THE INTERESTS OF ANYONE REPORTING CHILD ABUSE IN GOOD FAITH ARE PROTECTED;
- ANY EMPLOYEE, WHO INTENTIONALLY MAKES FALSE AND MALICIOUS ALLEGATIONS, WILL FACE DISCIPLINARY ACTION.

RESPONDING TO DISCLOSURE BY A CHILD

- IF A CHILD / YOUNG PERSON TELLS YOU THAT HE OR SHE HAS BEEN ABUSED, THEY MAY BE FEELING SCARED, GUILTY, ASHAMED, ANGRY, AND POWERLESS. YOU, IN TURN, MAY FEEL A SENSE OF OUTRAGE, DISGUST, SADNESS, ANGER AND SOMETIMES DISBELIEF;
- IF A CHILD DISCLOSES ABUSE, WHATEVER THE OUTCOME, THE CHILD MUST BE TAKEN SERIOUSLY;
- IT IS IMPORTANT FOR YOU TO REMAIN CALM AND IN CONTROL AND TO REASSURE THE CHILD / YOUNG PERSON THAT SOMETHING WILL BE DONE TO KEEP HIM OR HER SAFE;
- WHEN A CHILD OR YOUNG PERSON'S DISCLOSES THEY ARE BEING HARMED YOU CAN SHOW YOUR CARE AND CONCERN FOR THE CHILD/YOUNG PERSON BY:
 - LISTENING CAREFULLY;
 - TELLING THE CHILD / YOUNG PERSON YOU BELIEVE HIM OR HER;
 - TELLING THE CHILD / YOUNG PERSON IT IS NOT THEIR FAULT AND HE/SHE IS NOT RESPONSIBLE FOR THE ABUSE;
 - TELLING THE CHILD / YOUNG PERSON YOU ARE PLEASED HE / SHE TOLD YOU.

YOU WILL NOT BE HELPING THE CHILD / YOUNG PERSON IF YOU:

- MAKE PROMISES YOU CANNOT KEEP, SUCH AS PROMISING THAT YOU WILL NOT TELL ANYONE;
- PUSH THE CHILD / YOUNG PERSON INTO GIVING DETAILS OF THE ABUSE. YOUR ROLE IS TO LISTEN TO WHAT THE CHILD / YOUNG PERSON WANTS TO TELL YOU AND NOT TO CONDUCT AN INVESTIGATION (BEWARE OF ASKING ANY LEADING QUESTIONS AS THIS MAY PREJUDICE ANY SUBSEQUENT INVESTIGATION);
- INDISCRIMINATELY DISCUSS THE CIRCUMSTANCES OF THE CHILD / YOUNG PERSON WITH OTHERS NOT DIRECTLY INVOLVED.
- TRY AND OBTAIN SOME DETAILS SUCH AS WHERE THE ABUSE IS TAKING PLACE, SCHOOL, HOME, WORK ETC; IS IT CURRENTLY OCCURRING OR DID OCCUR IN THE PAST, NAME OF PERPETRATOR IF POSSIBLE BUT NOT NECESSARY;
- IT IS POSSIBLE THAT SOME CHILDREN OR YOUNG PEOPLE WILL MAKE A DISCLOSURE AND THEN ASK YOU NOT TO TELL ANYONE. IT IS IMPORTANT YOU SEEK GUIDANCE FROM THE PROGRAMS DIRECTOR TO DISCUSS HOW THE CHILD OR YOUNG PERSON CAN BE SUPPORTED AND THE DISCLOSURE MANAGED.

OTHER ACTIONS TO TAKE

PROTECT THE CHILD

ONCE AN ALLEGATION IS MADE THERE SHOULD BE AN IMMEDIATE RESPONSE THAT PROTECTS THE CHILD FROM FURTHER POTENTIAL ABUSE OR VICTIMIZATION. THE CHILD MAY REQUIRE MEDICAL ASSISTANCE OR COUNSELING SUPPORT. WHERE POSSIBLE THE CHILD SHOULD REMAIN IN THE PLACE OF RESIDENCE OR RELEVANT PROGRAM. EXCEPTIONS MAY BE MADE WHERE THE CHILD IS DEEMED TO BE AT RISK OF VICTIMISATION BY PEERS AS A RESULT OF THE ALLEGATION OR BECAUSE THE ALLEGED ABUSE HAS OCCURRED IN HOME-BASED CARE. IF THE CHILD IS IN IMMEDIATE DANGER YOU SHOULD MAKE ARRANGEMENTS FOR THE CHILD TO GO TO A SAFE PLACE.

DISTANCE THE ALLEGED PERPETRATOR

THE BEST INTEREST OF THE CHILD MAY WARRANT THE STANDING DOWN OF A STAFF MEMBER OR VOLUNTEER. ANY STAFF MEMBER STOOD DOWN IN THIS MANNER CONTINUES TO RECEIVE FULL PAY-THIS MEASURE RECOGNISES THAT THAT THE MEMBER IS ENTITLED TO A JUST PROCESS THAT DOES NOT PRE-JUDGE GUILT OR INNOCENCE. ANY VOLUNTEERS WHO ARE STOOD DOWN SHOULD SIMILARLY RECEIVE ANY REASONABLE REIMBURSEMENT OF COSTS.

CONFIDENTIALITY

ALL REPORTS, THE NAMES OF PEOPLE INVOLVED AND THE DETAILS WILL REMAIN CONFIDENTIAL. ONLY THE GENERAL MANAGER AND / OR RESIDENT MANAGER, AND THE PEOPLE INVOLVED WILL BE INFORMED OF THE REPORT. DETAILS WILL BE RELEASED ON A "NEED TO KNOW" BASIS OR WHEN REQUIRED BY RELEVANT LOCAL OR SRI LANKAN LAW OR A NOTIFICATION TO POLICE OR CHILD PROTECTION AUTHORITIES IS MADE.

REVIEWING THE CHILD PROTECTION POLICY

CLUB HOTEL DOLPHIN'S CHILD PROTECTION POLICY WILL BE REVIEWED EVERY TWO YEARS. THE GENERAL MANAGER AND / OR RESIDENT MANAGER WILL MANAGE THE REVIEW OF THE CPP, AND STAFF WILL BE CONSULTED IN THIS PROCESS.

CLUB HOTEL DOLPHIN KEY DOCUMENTS

1.1 CHILDREN'S RIGHTS STATEMENT

CLUB HOTEL DOLPHIN, WAIKKAL BELIEVES THAT CHILDREN WHO COME TO THE HOTEL AND ITS ACTIVITIES, SHOULD:

- FEEL COMFORTABLE
 - BE CARED FOR
 - FEEL SAFE AND BE SAFE.
-
- ALL MANAGER / ASSOCIATE DO THEIR BEST TO MAKE SURE CHILDREN HERE ARE PROTECTED FROM ANY HARM. IT IS NOT OKAY FOR ANYONE TO HURT YOUR FEELINGS OR YOUR BODY.
 - IT IS OKAY FOR YOU TO SAY NO TO A MANAGER / ASSOCIATE IF THEY ASK YOU TO DO SOMETHING THAT MAKES YOU FEEL UNSAFE OR UNCOMFORTABLE.
 - IF YOU EVER FEEL UNSAFE OR UNCOMFORTABLE WE WILL LISTEN TO YOU AND ACT TO HELP YOU.
 - IT IS ALWAYS OKAY TO TELL SOMEONE IF YOU ARE NOT FEELING COMFORTABLE OR SAFE OR IF YOU HAVE BEEN HURT.
 - IF YOU ARE UNHAPPY WITH THE WAY YOU ARE BEING TREATED PLEASE TELL A LEADER OR A PARENT.

1.2 CONTACT DETAILS OF CHILD PROTECTION

CHILD LINE SRI LANKA – DIAL ‘1929’

NATIONAL CHILD PROTECTION AUTHORITY

330, THALAWATHUGODA ROAD, MADIWELA, SRI JAYAWARDENAPURA, SRI LANKA

P: 94 112 778 911, 94 112 778 912, +94 112 778 913

F: 94 112 778 915

WEBSITE: WWW.CHILDPROTECTION.GOV.LK

SRI LANKA TOURIST POLICE (COLOMBO – HEAD OFFICE)

2ND FLOOR, SRI LANKA TOURISM DEVELOPMENT AUTHORITY BUILDING

NO. 80, GALLE ROAD, COLOMBO 03

HOTLINE: +94 11 2 421 451

TEL / FAX: +94 11 2 382 209

DIRECTOR – POLICE TOURIST DIVISION:

P.E.C. FERNANDO, SENIOR SUPERINTENDENT OF POLICE

P: +94 11 2 421 052, +94 11 2 421 054

F: +94 11 2 382 209

E: DPTD@SRILANKA.TRAVEL

OFFICER IN CHARGE – POLICE TOURIST UNIT – COLOMBO

N.J. EDIRISINGHE

P: +94 11 2 421 070

F: +94 11 2 382 209

E: OICPTD@ SRILANKA.TRAVEL

SRI LANKA TOURIST POLICE (NEGOMBO / ETHTHUKALA BRANCH)

POLICE TOURIST UNIT, PORUTHOTA ROAD, ETHTHUKALA, KOCHCHIKADE

CONTACT PERSON:

INSPECTOR OF POLICE- CHANAKA WIJERATHNA

P: +94 31 227 5555

M: +94 71 420 9595

SRI LANKA TOURIST POLICE (GALLE / NARIGAMA BRANCH)

POLICE TOURIST UNIT, NARIGAMA, HIKKADUWA

CONTACT PERSON:

SUB-INSPECTOR OF POLICE / B.H.C.R. SANJEEWA

P: +94 91 227 5554

M: +94 773 421 745

SRI LANKA TOURIST POLICE (NUWARA ELIYA BRANCH)

POLICE TOURIST UNIT, CENTRAL BUS STAND, NUWARA ELIYA

CONTACT PERSON:

INSPECTOR OF POLICE / DAMITH RUPASINGHE

P: +94 52 222 2223

M: +94 772 222 161

SRI LANKA TOURIST POLICE (MATALE/ DAMBULLA BRANCH)

POLICE TOURIST UNIT, NEW BUS STAND, DAMBULLA

CONTACT PERSON: SUB INSPECTOR OF POLICE/ RAJAPAKSHA
(C/O ECONOMIC CENTRE – DAMBULLA)

P: +94 66 567 7966

CHILD PROTECTION CODE OF CONDUCT

I, _____, AGREE THAT I WILL COMPLY WITH CLUB HOTEL DOLPHIN CHILD PROTECTION POLICY AND, WHILE WORKING WITH OR RELATED TO THE CLUB HOTEL DOLPHIN, I WILL:

- TREAT CHILDREN WITH RESPECT REGARDLESS OF RACE, COLOR, SEX, LANGUAGE, RELIGION, POLITICAL OR OTHER OPINION, NATIONAL, ETHNIC OR SOCIAL ORIGIN, PROPERTY, DISABILITY, BIRTH OR OTHER STATUS
- NOT USE LANGUAGE OR BEHAVIOR TOWARDS CHILDREN THAT IS INAPPROPRIATE, HARASSING, ABUSIVE, SEXUALLY PROVOCATIVE, DEMEANING OR CULTURALLY INAPPROPRIATE
- NOT ENGAGE CHILDREN IN ANY FORM OF SEXUAL ACTIVITY OR ACTS, INCLUDING PAYING FOR SEXUAL SERVICES OR ACTS. I UNDERSTAND THAT MISTAKEN BELIEF OF THE AGE OF THE CHILD IS NOT A DEFENSE
- WHEREVER POSSIBLE, ENSURE THAT ANOTHER ADULT IS PRESENT WHEN WORKING IN THE PROXIMITY OF CHILDREN NOT INVITE UNACCOMPANIED CHILDREN INTO MY HOME, UNLESS THEY ARE AT IMMEDIATE RISK OF INJURY OR IN PHYSICAL DANGER
- NOT SLEEP CLOSE TO UNSUPERVISED CHILDREN UNLESS ABSOLUTELY NECESSARY, IN WHICH CASE I MUST OBTAIN MY MANAGER'S PERMISSION, AND ENSURE THAT ANOTHER ADULT IS PRESENT IF POSSIBLE
- USE ANY COMPUTERS, MOBILE PHONE, OR VIDEO AND DIGITAL CAMERAS APPROPRIATELY, AND NEVER EXPLOIT OR HARASS CHILDREN OR TO ACCESS CHILD PORNOGRAPHY THROUGH ANY MEDIUM
- REFRAIN FROM PHYSICAL PUNISHMENT OR DISCIPLINE OF CHILDREN (EXCLUDING MY OWN CHILDREN)
- REFRAIN FROM HIRING CHILDREN FOR DOMESTIC OR OTHER LABOR WHICH IS INAPPROPRIATE GIVEN THEIR AGE OR DEVELOPMENTAL STAGE, WHICH INTERFERES WITH THEIR TIME AVAILABLE FOR EDUCATION AND RECREATIONAL ACTIVITIES, OR WHICH PLACES THEM AT SIGNIFICANT RISK OF INJURY
- COMPLY WITH ALL RELEVANT LEGALIZATION, INCLUDING LABOR LAWS IN RELATION TO CHILD LABOR
- IMMEDIATELY REPORT CONCERNS OR ALLEGATIONS OF CHILD ABUSE IN ACCORDANCE WITH APPROPRIATE PROCEDURES OUTLINED IN THE CLUB HOTEL DOLPHIN CHILD PROTECTION POLICY

USE OF CHILDREN'S SOUNDS AND IMAGES FOR WORK RELATED PURPOSES



CHILD PROTECTION POLICY

I AGREE THAT I WILL COMPLY WITH THE CLUB HOTEL DOLPHIN PHOTOGRAPHY USE OF IMAGE POLICY, SET OUT IN THE ANNEXURE.

I UNDERSTAND THAT THE ONUS IS ON ME TO USE COMMON SENSE AND AVOID ACTIONS OR BEHAVIORS THAT COULD BE CONSTRUED AS CHILD ABUSE WHEN UNDERTAKING PROJECT ACTIVITIES.



CHILD PROTECTION POLICY

I CONFIRM THAT AT NO TIME HAVE I EVER BEEN INVOLVED IN OR CONVICTED OF ANY CRIMINAL OFFENCE, INCLUDING AN OFFENCE OF OR RELATING TO CHILD ABUSE OR CHILD PORNOGRAPHY, IN ANY COUNTRY. I HAVE NOT BEEN CHARGED WITH ANY OFFENCE THAT IS INCOMPLETE OR AWAITING LEGAL ACTION, NOR AM I AWARE OF ANY INVESTIGATION INTO MY AFFAIRS THAT HAS THE POTENTIAL TO LEAD TO SUCH CHARGES.

NAME (PLEASE PRINT)

SIGNATURE

DATE

CHILD PROTECTION CODE OF CONDUCT

ANNEXURE

PHOTOGRAPHY

USE OF IMAGE POLICY

1. CONSENT

1.1. PHOTOS ON LOCATION AT ANY WORK AREA OF THE CLUB HOTEL DOLPHIN MUST ONLY BE TAKEN AFTER PERMISSION HAS BEEN GRANTED BY THE PERSON(S) TO BE PHOTOGRAPHED.

1.2. PHOTOS OF CHILDREN ON LOCATION AT ANY WORK AREA OF THE CLUB HOTEL DOLPHIN WILL NOT BE TAKEN UNLESS PARENTAL OR GUARDIAN CONSENT HAS BEEN OBTAINED.

1.3. WHEN POSSIBLE, ESTABLISH A RELATIONSHIP BEFORE YOU START TAKING PHOTOS. WHEN YOU APPROACH PHOTO SUBJECTS IN AREA, BRIEFLY INTRODUCE YOURSELF, ARE COURTEOUS, AND EXPLAIN THE PURPOSE OF YOUR VISIT OR THE REASON YOU WANT TO TAKE PHOTOS.

2. TYPES OF IMAGES

2.1. PHOTOS MUST BE TAKEN IN A COURTEOUS MANNER, GIVING DUE RESPECT TO THE LOCAL COMMUNITIES, STAFF AND OTHERS.

2.2. THE IMAGES MUST PRESENT SUBJECTS IN A DIGNIFIED MANNER AND SHOULD NOT PRESENT THEM AS VULNERABLE OR VICTIMS.

2.3. PEOPLE (ESPECIALLY CHILDREN) SHOULD BE ADEQUATELY CLOTHED IN PHOTOGRAPHS AND NOT IN POSES THAT COULD BE INTERPRETED AS SEXUALLY SUGGESTIVE.

2.4. PATERNALISTIC IMAGES SHOULD BE AVOIDED (EX. PORTRAYING THE HOTEL AS THE 'PROVIDERS')

3. PHOTO USE

3.1. YOU WILL NOT USE ANY PICTURES, IMAGES, OR OTHER LIKENESSES OF CHILDREN AND / OR INFORMATION RELATED TO CHILDREN THAT COULD COMPROMISE THEIR CARE AND PROTECTION THROUGH ANY FORM OF COMMUNICATION MEDIA (INCLUDING ALL SOCIAL MEDIA SUCH AS FACEBOOK, MYSPACE, FLICKER, TWITTER, YOUTUBE, ETC.)

3.2. REMEMBER: PHOTOGRAPHING AND USING PHOTOS OF VULNERABLE POPULATIONS REQUIRES EXTREME CARE AND SENSITIVITY. TO PROTECT THE IDENTITY OF INDIVIDUALS WHO MAY BE PUT AT RISK OF REPRISAL OR REJECTION IN THEIR COMMUNITIES AS A RESULT OF ALLOWING THEIR PICTURE TO BE TAKEN IT IS NECESSARY TO MAKE SURE THEY CANNOT BE IDENTIFIED AND LEAVE OUT PERSONAL INFORMATION SUCH AS NAMES.

3.3. IMAGES OF CHILDREN SHOULD NOT BE ACCOMPANIED BY INFORMATION RELATING TO THEIR PLACE OF RESIDENCE. IMAGES WITH CORRESPONDING TEXT, WHICH MAY IDENTIFY A CHILD, MUST BE REMOVED.

3.4. PHOTOGRAPHS SHOULD BE USED IN CONTEXT AND SHOULD BE A TRUE REPRESENTATION OF EVENTS.

3.5. IMAGES WILL NOT BE USED IN PUBLIC COMMUNICATIONS WITHOUT THE WRITTEN APPROVAL OF THE COMMUNICATIONS MANAGER OF HEMAS HOLDING PLC.

4. MEDIA

4.1. MEDIA (INCLUDING PRINT, TV, VIDEO, DOCUMENTARY OR OTHER MEDIA) MUST ACT WITH PARTICULAR SENSITIVITY TO ENSURE OUR STAFF; COMMUNITIES AND BENEFICIARIES ARE NOT ENDANGERED.

4.2. NO INDIVIDUAL CHILD'S IMAGE (INCLUDING PHOTO OR VIDEO) MAY BE USED IN ANY IDENTIFIABLE FORM FOR THE PURPOSE OF MEDIA.

4.3. PICTURES OF CHILDREN IN GROUPS OF MORE THAN THREE ARE PERMISSIBLE AS LONG AS THEY ARE NOT LABELED, NAMED, OR OTHERWISE IDENTIFIED IN ANY WAY.

4.4. DIRECTION AND PERMISSION FOR ANY MEDIA MUST BE SOUGHT FROM AND GIVEN BY THE COMMUNICATIONS MANAGER OF HEMAS HOLDING PLC.