

	<h1>HR POLICY MANUAL</h1>		
	<h2>Child Protection Policy</h2>	<b>DOCUMENT No:</b> HR 13	<b>REF No:</b> HR/2024/13

## Policy Statement

Uga Escapes (Private) Limited strongly believes in its duty of care to safeguard and promote the welfare of all children regardless of age, gender, religion, belief, ethnicity, disability, sexual orientation, or socio-economic background.

With this in mind, this policy aims to educate all employees in terms of child protection, to promote a child-safe and child-friendly culture committed to keeping children safe from harm and exploitation. Additionally, the policy guides how to respond to concerns and allegations of child abuse or exploitation.

### 1. Definitions

**Child** – As per the UNICEF portfolio document on Child Protection in Sri Lanka, there is no single legal definition of the state of being a child under Sri Lankan law. The Children's Charter has defined the child as a person under 18 years of age. In addition to this in the Age of Majority Ordinance (1865) as amended by the Age of Majority (amendment) Act No. 17 of 1989, the age of majority is mentioned as 18 years.

Uga Escapes recognizes any person **under the age of 18 years as a child**.

**Child Abuse** – Refers to all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to a child's health, survival, development, or dignity in the context of a relationship of responsibility, trust or power

### 2. Core Principles

- 2.1 Promote and prioritize the safety and wellbeing of children.
- 2.2 Ensure to protect children from any form of abuse and neglect during their stay with UGA Hotels.
- 2.3 Ensure that statutory laws, hotel policies as well as local customs and traditions are followed and respected when taking guests to our properties where interaction with children may occur.
- 2.4 Ensure appropriate action is taken in the event of incidents/concerns such as reporting any incident to relevant authorities, removal of the person involved from the premises, and support provided to the individuals who raise or disclose the concern.
- 2.5 Ensure that confidential, detailed, and accurate records of all safeguarding concerns will be maintained and securely stored.
- 2.6 Prevent the employment/deployment of unsuitable individuals.

**2.7** Not employ any person who is a child (below 18 years of age).

**2.8** Ensure that no locally sourced product will in any way be purchased, used, or promoted if it comes to our knowledge that it has been produced, wholly or in part, with the help of child labour.

### **3. Types of Child Abuse**

#### **3.1 Physical Abuse**

Occurs when a child is purposely physically injured or put at risk of harm,

##### **Types of Physical Abuse**

- Burning, hitting, kicking, and biting.
- Shaking or throwing a child.
- Throwing objects at a child.
- Tying / restraining a child.
- Signs of Physical Abuse
- Unexplained injuries, such as bruises, fractures, or burns.
- Injuries that may reveal a pattern, for example, more than one burn or welts on the hand.
- Appearing to be frightened of a specific individual.
- Being watchful, as if expecting something unpleasant to happen.
- Flinching when touched.
- A child talking about being injured by a parent, caregiver, or other people.

#### **3.2 Emotional Abuse**

Occurs when a child is treated in a way that negatively impacts their social, emotional, or intellectual development.

##### **Types of Emotional Abuse**

- Name-calling, insulting, teasing, threatening, bullying, and yelling.
- Ridiculing or mocking a child's physical appearance or how they try to communicate.
- Preventing normal social interaction with peers and others.
- Exposure to domestic and family violence.
- Isolation or locking a child up for extended periods.

#### **3.3 Neglect**

Refers to the failure to provide adequate food, shelter, affection, supervision.

##### **Types of Neglect**

- Not providing appropriate food, shelter, clothing, or medical care.
- Locking a child in a room / cupboard / washroom / balcony.
- Not providing adequate shelter & food, including locking a child out of a room.
- Placing or leaving the child in a situation in which they might experience emotional or physical danger or harm.
- Signs of Neglect
- Medical care needs not being met; including difficulty to breathe or an injury.

- If a child misses regular mealtimes or is not being provided with food.
- Locking a child in a room / cupboard / washroom / balcony.
- Locking a child outside a room without adequate supervision.
- Pool usage & sea baths without adequate adult supervision.
- Allowing the child to wander around the property/beach without adequate adult supervision.

### **3.4 Sexual Abuse**

Refers to when an adult, teenager, or child uses their power or authority to involve another child in any sexual activity.

#### **Types of Sexual Abuse**

- Any sexual contact with the child.
- Forcing a child to take part in pornographic pictures or videos.
- Initiating private contact via phone call, email, text, social media, or other messages with a child.
- Showing a child sexual/pornographic material.
- Telling "dirty" jokes or stories to a child.

#### **Signs of Sexual Abuse**

- A child talking about being sexually abused or explaining sexual activity with an adult.
- Displaying sexual knowledge or behaviour which is beyond their age.
- Appearing to be frightened of a specific individual.
- Seeing an individual attempting to make sexual contact with a child.
- Seeing an individual showing sexual/pornographic material to a child.
- Seeing an individual taking a child to a secluded location in a suspicious manner.
- Seeing an individual attempting to take a non – related child to an accommodation / secluded area.
- Bringing a child into the hotel premises without the child's parents.

## **4. Reporting Child Abuse**

Uga Escapes 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.

All employees must report concerns or allegations of child abuse immediately. These concerns may relate to the following;

- A concern of child abuse at the hotel premises
- An employee involved in any sort of child abuse
- A concern about a child or person outside of the hotel who may be involved in child abuse of any kind.

#### **4.1 Who can & should report?**

- Children
- All employees (contract staff / casual staff/trainees)
- Guests
- Third-party contractors
- Members of the community
- Partner Organizations

#### **4.2 What should be reported?**

- Any disclosure or allegation regarding the breach of safety, abuse, or exploitation of a child.
- Any observation or concerning behaviour exhibited by an employee, guest, third party contractor, or another relevant stakeholder that breaches the Child Protection Policy.
- Inappropriate use of the company's photographic equipment, devices, or computers may result in the abuse or exploitation of a child, including child pornography.
- Suspicious behaviour that could be associated with sexual exploitation, trafficking, or grooming.

#### **4.3 Who to report to?**

All concerns of child abuse should be made to the General Manager / Resident Manager of the hotel. In his / her absence the Resort HR representative should immediately be notified.

#### **4.4 When to report?**

All child abuse concerns should be raised immediately.

#### **4.5 How should it be reported?**

##### **For Employees**

Verbally and by completing an incident report with the aide of the Resort HR representative.

##### **For Guests, Third Party Contractors, Community Members**

Verbally, with an incident report being documented by an employee appointed by the General Manager / Resident Manager.

#### **4.6 Responding to Reports**

The General Manager / Resident Manager will discuss the allegations, interview the person/persons who made the report and other witnesses to gather more information in regards to the Child abuse concern, after which the following action can be taken following the findings;

- If the findings are a criminal breach or involve a guest / external party; the findings should be reported to the local police/tourist police/child protection authority. (Contact details in Appendix)

- Disciplinary action will be taken if the breach involves an employee and is not a criminal matter, in line with the Uga Disciplinary Procedure.
- If the report is found to be baseless, no further action will be taken.

Uga Escapes will treat all concerns raised seriously and ensure that all parties will be treated fairly. 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. The company will ensure that the interests of anyone reporting child abuse in good faith are protected. However, if it is found that the complaint is made on a baseless allegation and with malicious intent, action will be taken against the complainant.

#### **4.7 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. The following steps must be followed in the event a report of child abuse is made by a child.

If a child discloses abuse, whatever the outcome, the child must be taken seriously, and the concern must immediately be referred to the General Manager / Resident Manager of the property or the Resort HR Representative in his / her absence.

It is important for you to remain calm and in control and to reassure the child that something will be done to keep him / her safe.

When a child discloses they are being harmed you can show your care and concern for the child by:

- Listening carefully.
- Telling the child you believe him or her.
- Telling the child it is not their fault and he/she is not responsible for the abuse;
- The parent/guardian of the child must be notified immediately and be present when the child abuse/exploitation complaint is made (provided the complaint is not made against them).
- In the event, a complaint of abuse is made against the parent/guardian the local police and or child protection authority should be informed immediately.
- It is important that the child is protected and isolated from his / her abuser at all times (apart for identification purposes), till they are handed over to the parent/guardian or relevant authority.

## **5. Babysitting**

Uga Escapes does not offer babysitting services.

## 6. Employment

Uga Escapes (Private) Limited is committed to child safe recruitment, selection, and screening practices.

### 6.1 Recruitment Age

The organization strives to not employ any person under the age of 18, in any capacity. All Heads of Department (HOD) are strictly urged to screen all applicants and ensure compliance with the minimum recruitment age at all times. In the event, a HOD knowingly recruits a person under the age of 18 disciplinary actions may be taken against them.

### 6.2 Recruitment & Screening

The following practices aim to recruit the safest and most suitable people to work at Uga Hotels;

- All applicants will be made aware of the Child Protection Policy and be informed of the recruitment screening requirements.
- All positions will be assessed for the level of risk concerning contact with children. Positions with direct contact with children and guests, and access to guest rooms will require the highest level of screening; with behavioural-based questions being asked which will assess candidate's attitudes to children, professional boundaries, accountability, 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 all types of employment (contract / casual / trainee). The candidate's most recent employer/supervisor must be one of these referees. The resort HR Teams will verify the identity of the referee and make direct contact with each of these referees.
- Police Certificates and Grama Sevaka reports must be submitted in all types of employment at the Hotels.

## 7. Legal drinking age and serving alcohol

All employees at Uga Hotels are strictly advised to not serve alcohol to any guest below the legal drinking age (18) in Sri Lanka. In the event, an employee believes a guest ordering alcohol is a child (below the age of 18) they are required to request proof of identification and age in a courteous manner for verification.

## 8. Emergency Response System

All guests will be required to share the details of an alternative contact person who will be contacted in case of an emergency, at the point of Check-In. An event where a guest is traveling with a child whom they are the parent / legal guardian to; this alternative contact person will be considered a caregiver to the child in the event parent / legal guardian is unavailable due to an emergency as mentioned but not limited to the below;

- If an incident incapacitates the guest; which can include serious physical harm or death.

- If the guest goes missing.
- If a guest is being neglectful towards a child.
- If the guest is subject to legal action which renders them unavailable.
- Further to this, all guests traveling with children are also required to provide consent at the point of Check-In; for the Management to act as a temporary caregiver to the child in the event of any of the aforementioned emergencies, till the alternative contact person is contacted and the child handed over (after confirmation of identity) within a reasonable time frame.

## 9. Photography of Children

### 9.1 Consent

- All employees are strictly prohibited from photographing children for non-official purposes.
- In the event photographs are required for official purposes General Manager's approval is strictly required.
- Photographs will not be taken unless parental / guardian consent has been obtained prior.
- Before taking photographs for official purposes always establish a relationship before taking photos. When you approach the subjects of the photograph; briefly introduce yourself and explain the purpose and reason why you want to take photos courteously.
- In the event a guest (not a parent or guardian) is taking pictures of a child without the parents present or in a secluded or suspicious manner, the parents/guardian of the child should immediately be notified.

### 9.2 Types of Images

- Photos must be taken courteously, giving due respect to the local communities, employees, and others.
- The images must present subjects in a dignified manner and should not present them as vulnerable or victims.
- Children should be adequately clothed in photographs and not in poses that could be interpreted as sexually suggestive.

### 9.3 Official Usage of Images

- Uga Escapes and its employees 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, Instagram, LinkedIn, Twitter, YouTube, etc.)
- Employees are strictly prohibited from uploading images on personal social media channels at any time.
- Usage of images for official communications should be authorized by the Head of Marketing before usage.
- Consent of the subject / and or parents of the subjects must be obtained before usage of the image.

## **10. Staff Training**

The Human Resources department across Uga Hotels conducts regular training programs on its Child Protection Policy for employees to identify and report child abuse and neglect. The Company also uses email and poster awareness programs to educate employees regarding the consequences of involving, hiding, or neglecting child abuse.

## **11. Policy Review & Update**

The policy will be reviewed in 01 (one) year after development and then every 3 (three) years or in any of the following circumstances:

- Changes in legislation and/or government guidelines.
- As required by local organizations.
- As a result of any other significant change or event.



## Appendix

### Contact Details of Child Protection Services

**National Child Protection Authority**  
 Hotline – **1929**  
 No. 330, Thalawathugoda Road, Madiwela,  
 Sri Jayawardanapura.  
 Tel: +94 112 778 911 – 12 – 14  
 Email : [ncpa@childprotection.gov.lk](mailto:ncpa@childprotection.gov.lk)  
 Web : [www.childprotection.gov.lk](http://www.childprotection.gov.lk)

**Tourist Police Division (Colombo Head Office)**  
 Sri Lanka Hotel Management Institute  
 Building  
 No. 80, 2<sup>nd</sup> Floor, Galle Road, Colombo 03.  
 Tel/ Fax: +94 112 38 2209  
 Hotline: +94 112 421 451

Hotel Name	Nearest Police Station	Nearest Tourist Police
<b>Uga Ulagalla</b>	<b>Tirappane Police Station</b> Kandy - Jaffna Highway, Tirappane. Tel: +94 252 050 222	<b>Anuradhapura</b> Lion's Post Junction, Sri Maha Bodhi Mawatha, Anuradhapura. Tel: +94 113 133 686
<b>Uga Jungle Beach</b>	<b>Kuchchaveli Police Station</b> Kuchchaveli, Trincomalee. Tel: +94 262 225 222	<b>Trincomalee</b> Trincomalee Police Station, Main Street, Trincomalee. Tel: +94 262 222 222
<b>Uga Bay</b>	<b>Valaichenai Police Station</b> Trincomalee Road, Oddamavadi. Tel: +94 652 257 709	<b>Pasikudah</b> Main street, Kalkudha, Valachchenai. Tel: +94 652 257 707 +94 113 133 686
<b>Uga Residence</b>	<b>Slave Island Police Station</b> Sir Chittampalam A Gardiner Mawatha, Slave Island. Tel: +94 112 433 829 +94 112 433 820	<b>Head Office – Colombo</b> Sri Lanka Hotel Management Institute Building, No.80, 2 <sup>nd</sup> Floor, Galle Road, Colombo 03. Tel/ Fax: +94 112 38 2209 Hotline: +94 112 421 451
<b>Uga Chena Huts</b>	<b>Kirinda Police Station</b> Kirinda, Tissamaharama. Tel: +94 047 348 9722 *OIC Contact Details 071 8592240	<b>Mirissa</b> Tel: +94 412 261 122 *Tourist Police Hotline - +94 11 242 1052