

CREA's Child Protection Policy

INTRODUCTION

The current Child Protection Policy has been developed to regulate the behaviours, measures and practices taken by staff, interns, volunteers and any partner of CREA within the framework of their projects and interventions –if any, and ensure the right of all children to be protected from all forms of abuse, neglect, exploitation and violence, as established in 1989 in the UN Convention on the Rights of the Child (UNCRC). (<https://www.ohchr.org/en/professionalinterest/pages/crc.aspx>)

This Child Protection Policy complies with the Standards appointed by the EC (https://ec.europa.eu/info/policies/justice-and-fundamental-rights/rights-child/child-protection-systems_en#childprotectionpolicies) and Ethics Review of the Horizon 2020 programme¹. It has been drawn based on the Save the Children Child Safeguarding Policy (<https://www.savethechildren.org.uk/about-us/accountability-and-transparency/safeguarding-children>) as well as the CREA Ethical code from 2004.

DEFINITION & ACRONYMS

- A. **Child or Children:** Anyone under 18 years of age.
- B. **Child Abuse:** Anything which individuals, institutions or processes do or fail to do which directly or indirectly harms children or damages their prospect of safe and healthy development into adulthood. The main categories of Child Abuse are Physical Abuse, Emotional Abuse, Neglect/Negligent Treatment and Sexual Abuse/Sexual Exploitation.
 1. **Physical Abuse:** The use of physical force that causes actual or likely physical injury or suffering (e.g., hitting, shaking, burning, female genital mutilation, torture).
 2. **Emotional abuse:** Any humiliating or degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation.
 3. **Neglect/Negligent Treatment:** Persistent failure to meet a child's basic physical and/or psychological needs, for example by failing to provide adequate food, clothing and/or shelter; failing to prevent harm; failing to ensure adequate supervision; or failing to ensure access to appropriate medical care or treatment.
 4. **Sexual Abuse/Sexual Exploitation:** All forms of sexual violence, including incest, early and forced marriage, rape, involvement in pornography, and sexual slavery. Child sexual abuse also may include indecent touching or exposure, using sexually explicit language towards a child and showing children pornographic material. Sexual Exploitation is any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. This includes exchange of assistance due to children benefiting from CREA programming. The sexual exploitation of a child who is under the age of consent is child sexual abuse and a criminal offense.

- C. **Representatives of CREA:** researchers, grant holders, volunteers, consultants, Board members, Partners and others who work with children on CREA's behalf, visit CREA's programs, or who have access to sensitive information about children in CREA's programs.
- D. **Child Safeguarding:** The set of policies, procedures and practices that we employ to ensure that CREA is a child safe organization.

POLICIES

1. Policy on Commitment to Children

CREA is committed to conducting its researches and interventions in a manner that is safe for the children that participate in them. All CREA Representatives are explicitly prohibited from engaging in any activity that may result in any kind of Child Abuse.

In addition, it is CREA's policy to create and proactively maintain an environment that aims to prevent and deter any actions and omissions, whether deliberate or inadvertent, that place children at the risk of any kind of Child Abuse.

All CREA Representatives are expected to conduct themselves in a manner consistent with this commitment and obligation. Any violations of this policy will be treated as a serious issue and will result in disciplinary action being taken, including termination and any other available legal remedy.

In furtherance of this Policy, CREA has adopted, when needed, Procedures, described below, to promote:

- a. **Prevention of Child Abuse:** Striving, through awareness, good practice and training, to minimize the risks to children and take positive steps to help protect children who are the subject of any concerns.
- b. **Reporting of Child Abuse:** Ensuring that all Representatives know the steps to take and whom to contact where concerns arise regarding the safeguarding of children.
- c. **Responding to Child Abuse:** Engaging in action that supports and protects children when concerns arise regarding their well-being; supporting those who raise such concerns; investigating, or cooperating with any subsequent investigation; and taking appropriate corrective action to prevent the recurrence of such activity.
- d. **Training to Promote Awareness of Child Safeguarding Obligations:** Ensuring that all Representatives are notified of and made aware that they are expected to comply with the policy.

2. Policy to Comply with Applicable Laws and Regulations

It is CREA's Policy to ensure compliance with local and/or national country and local child welfare and protection legislation, or international standards, whichever affords greater protection, and with the applicable law. The requirements of this Child Protection Policy are in addition to any other applicable legal requirements.

3. Policy Regarding Sexual Activity with Children

It is CREA's Policy that any individual under the age of 18 is a child and is "underage", regardless of the legal age of consent of the country in which s/he lives and/or in which the offense occurs. An underage child cannot legally give informed consent to sexual activity. Sexual activity with a Child with or without their consent will be treated as a serious issue and will result in disciplinary action being taken, including termination, and the pursuit of any other available legal remedy.

4. Policy on Accountability of CREA's Management

CREA has designated an Ethics Committee to prevent, monitor and address any ethical issues, including child safeguarding. Therefore, CREA's Ethical Committee is committed to taking all appropriate corrective actions, including disciplinary, legal or other actions in response to any violation of the Child Protection Policy, with respect to relevant individuals (including those who committed a child safeguarding violation and/or anyone who knew of such child safeguarding violation but failed to act), and taking steps following any findings of a violation of the Child Protection Policy to review the applicable policies, procedures, and protocols to identify and address any gaps or weaknesses. This Committee also reviews research projects that involve minors, following the principles of the Declaration of Helsinki (World Medical Association) and the Ethics Review of the Horizon 2020 programme, among other appropriate references. Any exceptions to this Policy must be sent in advance for approval to the Ethics Committee.

5. Policy on Confidentiality in Child Safeguarding Matters

CREA has a duty to manage sensitive information in a manner that is respectful, professional and that complies with the applicable law. Staff must keep all information about any suspected or reported incidents strictly confidential, and must divulge only that information to the Ethical Committee or the PI (Principal Investigator) in the project in which s/he participates, except as may be required by law.

PROCEDURES

1. Prevention of Child Safeguarding Incidents

A. Mitigating Child Safeguarding Risks in Project Planning And Implementation

1. Where possible and practical, the 'two-adult' rule, wherein two or more adults supervise all activities where children are involved and are present at all times, should be followed.
2. Representatives must never:
 - hit or otherwise physically assault or physically abuse Children;
 - engage in sexual activity or have a sexual relationship with anyone under the age of 18 years regardless of the age of majority/consent or custom locally (mistaken belief in the age of a child is not a defence);
 - develop relationships with Children which could in any way be deemed exploitative or abusive;

- act in ways that may be abusive in any way or may place Children at risk of abuse;
- use language, make suggestions or offer advice to Children which is inappropriate, offensive or abusive;
- behave in a manner which is physically inappropriate or sexually provocative;
- stay alone overnight with one or more Children participating in CREA's researches who are not part of their family, whether in their house or elsewhere;
- do things for Child participants of a personal nature that they can do themselves;
- condone, or participate in, behaviour of Children which is unsafe or illegal;
- act in ways intended to shame, humiliate, belittle or degrade Children, or otherwise perpetrate any form of emotional abuse;
- discriminate against, show unfair differential treatment or favour to particular Child participants to the exclusion of others;
- spend excessive time alone with Child participants away from others in a manner which could be interpreted as inappropriate;
- expose Child participants to inappropriate images, films and websites including pornography and extreme violence;
- place themselves in a position where they are made vulnerable to allegations of misconduct.

This is not an exhaustive or exclusive list. Representatives should at all times avoid actions that may allow behaviour to be misrepresented or constitute poor practice or potentially abusive behaviour.

B. Background Checks

CREA members and Representatives directly working with children shall provide proof of a clear criminal record regarding sexual crimes. Representatives, interns and/ or collaborators from other countries shall request this certificate, together with the Apostille, at their home country and provide it to the Ethics Committee on arrival. Visitors will not be required this step, as they will be at all times during their visit with a CREA member or representative that has provided such proof (See Procedures, point7).

2. Reporting of Child Safeguarding Incidents

All Representatives should know the steps to take and whom to contact when concerns arise regarding the safeguarding of children. Failure to report a reasonable suspicion of misconduct in accordance with this Policy will be treated as a serious issue and may result in disciplinary action.

If a child is in danger or in harm's way, call the local authorities immediately.

Reporting Specifics

A. CREA members:

All CREA members are required to report child maltreatment. Incident reports must be submitted by email to **the Ethics Committee** within 24 hours. The report always should include:

- Date, time and location of the incident
- Type of incident (physical abuse, emotional abuse, neglect/negligent treatment, sexual abuse/sexual exploitations) and nature of what happened
- The relevant actions that are happening at the time of the report

B. All other Representatives:

All other representatives covered by this policy must report any suspicion of misconduct covered by this policy to their direct supervisor. If you feel you cannot raise the concern with your direct supervisor for any reason, you should contact the PI of the project in which the misconduct took place. Alternatively, you can report by email to the Ethics Committee.

All reports must be made within 24 hours

C. Responsibilities:

Any PI or staff member who receives a report of any allegation of a violation of this Child Protection Policy must forward the report immediately to the Ethics Committee by email at: creaethics@gmail.com.

D. Staff Overseas

When travelling or working overseas, you are required to report any allegations of Child Abuse through the same safeguarding reporting procedures listed above.

3. Responding to Child Safeguarding Incidents

A. Ethics Committee

The CREA Ethics Committee members have the knowledge and professional expertise to address child safeguarding procedures and will coordinate with CREA's PIs, and others as appropriate, when conducting any child safeguarding investigation.

The Ethics Committee will:

- Receive child safeguarding reports in accordance with this Child Safeguarding Policy; and
- Provide overall support to the wider implementation of policies and procedures to safeguard children, namely the Child Protection Policy and other related policies and documents.
- Review research proposals to ensure meeting all principles established in the main reference documents, such as the Declaration of Helsinki (World Medical Association), taking special care of the ethical dimension of research proposals addressing vulnerable groups, where children are included.

B. Investigating and Follow-up of Child Safeguarding Allegations

CREA takes every allegation of a violation of our Child Safeguarding Policy seriously. The Ethics Committee is responsible to ensure all credible allegations are logged and tracked.

The Ethics Committee is tasked with following up with the other involved CREA personnel to ensure all allegations are properly investigated and all appropriate corrective action and remedial measures are taken.

Representatives covered by this policy must cooperate fully with any investigation or inquiry by Ethics Committee and preserve all records relating to any alleged violation of this Child Protection Policy. Although we cannot guarantee confidentiality, we will keep reported concerns confidential to the extent possible.

1. **Initial Assessment:** Upon receipt of a report, an initial assessment will be conducted by the Ethics Committee, together with the project’s IP, if necessary. A full account of the matter and any further action will be recorded on a Child Protection Report Form. Professional advice will be sought as needed and the next steps will be determined.
2. **Reporting to Applicable Authorities:** referrals will be made to the police as soon as possible.

4. Training to Promote Awareness of Child Safeguarding Obligations

All CREA staff must undertake an initial training on the Child Protection Policy within the first three months after induction to CREA, and/or within the first six weeks following the promulgation of this Policy, and they will sign an agreement to adhere to it. Refresher trainings every three years.

PIs are responsible for ensuring those reporting to them are made aware of and understand this Policy and are given trainings as described above.

Other trainings will be required dependent on job specific responsibilities.

5. Agreements with Partners

All agreements with Partners (as defined above) in which a CREA member or groups of members is the coordinator must include the requirements of the Policy, together with a written consent in which the Partner agrees to comply with this Policy, or the one subject to their institutions or countries.

6. Communications Materials (interviews, photography and filming)

Any communications materials that include information about or images of children are subject to the Communications Guidelines attached as Annex I and included as part of this Child Safeguarding Policy.

7. Guests on Project Visits

All Representatives of CREA on project visits involving children are subject to the Program Visit Child Protection Guidelines attached as Annex II and included as part of this Child Safeguarding Protection Policy. As a condition to their visit, all Representatives visiting projects involving Children in CREA programs are required to sign the Child Protection Policy Acknowledgement attached as Annex III prior to the visit. Once at the project, there should be a verbal presentation made to the guests regarding appropriate conduct.

TRAINING REQUIREMENTS

Training Course	Who?	Frequency	Training Moment
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Child Protection Policy Fundamentals Training	All	Upon induction, and every three years	First 3 months after induction or within five weeks following the promulgation of policy
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MONITORING MECHANISMS

What are you monitoring?	Data Source	Action Owner	Escalation Levels	Frequency
Relevant Trainings	Ethics Committee Training Tracker	Ethics Committee	Direction and other Management members	Annual
Policies and procedures are reviewed at least every 3 years	Expiry date from the Policies and Procedures Library	Ethics Committee	Direction and other Management members	Every three years

EXCEPTION APPROVAL PROCEDURE

Procedure/ Action	Action Owner
Exceptions to this policy requires written approval by the Ethical Committee	Person seeking exception to policy
File and retain exception approval	Ethics Committee & Assembly of Members

VERSION CONTROL

Version number	Version Date	Revisions made
CPP-01.1	November 1, 2018	First Version

ANNEX I: COMMUNICATIONS GUIDELINES

1. Guidelines for ethical reporting about children

We have a responsibility to the children with whom we conduct research to tell their stories in a responsible and ethical manner. The child's best interest should always be our primary consideration. We conduct research with children from very different backgrounds, including vulnerable groups and in our interventions we must respect the dignity and humanity of the children who participate in our

researches and we must not present results in a way that stigmatises any of them or contributes to reproduce stereotypes.

Children and young people have all the rights of adults. In addition, they have the right to be protected from harm. Reporting on children and young people carries this added dimension and restriction, especially in the current era when it is nearly impossible to limit a story's reach. This document is meant to support the best intentions of ethical reporting – serving the public's interest for truth without compromising the rights of children.

In some instances, the act of reporting on children places them or other children at risk of exploitation, retribution or stigmatization. When in doubt, we must err on the side of caution and ensure the right of the child to be protected from harm.

2. Guidelines for collecting data from children

- 1) Ensure that the child and parents/legal representatives have signed a consent form to participate in the research. Permission must be obtained in circumstances that ensure the child and guardian are not coerced in any way and understand they are part of a story that might be disseminated locally and globally. This is usually ensured only if the permission is obtained in the child's language and if the decision is made in consultation with an adult the child trusts.

Following European recommendations for H2020 projects, the informed consent will have, at least, the following information:

- Explanation of the research purposes, the expected duration of the subject's participation.
 - A statement that participation is voluntary and informed.
 - Information about who is organising and funding the research.
 - A description of any benefits to the subject or to others which may reasonably be expected from the research avoiding inappropriate expectations.
 - Statement describing the procedures adopted for ensuring data protection/confidentiality/privacy including duration of storage of personal data.
 - A reference to whom to contact for answers to pertinent questions about the research and research subjects' rights and whom to contact in the event of a research-related injury to the subject.
 - An explanation of what will happen with the data or samples at the end of the research period and if the data/ samples are retained or sent/sold to a third party for further research.
 - Information about what will happen to the results of the research.
- 2) Do no harm to any child. Stick to the interview's approved questions when available and avoid questions, attitudes or comments that are judgmental or insensitive to cultural values, that place a child in danger or expose a child to humiliation, or that reactivate a child's pain and grief from traumatic events.
 - 3) Assess any potential risks to the child or children, including:
 - Reprisals,

- Stigmatization, rejection or attacks by family or communities,
 - Legal prosecution,
 - Misguided or malicious attempts by outsiders to “rescue” the child from a difficult situation.
- 4) No staging: Do not ask children to tell a story or take an action that is not part of their own history.
 - 5) Pay attention to where and how data is collected from the children. Try to make certain that children are comfortable and able to tell their story without outside pressure, including pressure from the interviewer. Interviews will be conducted in a safe space for the children, following the 2 adult rule when possible or with the door open.
 - 6) If a child discloses bad practice during an interview (such as abuse, criminal activity or a violation of CREA policy), the person carrying out the interview should follow the reporting procedures established in this Child Protection Policy, or the one that applies.
 - 7) No payments or any other form of compensation are to be provided to children or parents in exchange for their participation in the research.

3. Guidelines for reporting on children

- 1) Do not further stigmatize any child. Avoid categorizations or descriptions that expose children to negative reprisals – including additional physical or psychological harm, or to lifelong abuse, discrimination or rejection by their local communities.
- 2) Do not give any information that could lead to a child being identified or traced. Use pseudonyms to anonymise the data.

ANNEX II: PROGRAM VISIT CHILD PROTECTION GUIDELINES

1. Standards & Procedures for Child Safeguarding and Visits:

- 1.1 Uphold the agency Child Protection Policy standards through background checks, policy review, signed policy acknowledgements, briefings, and general application to all CREA research visitors. Examples of visitors include professors, visiting scholars, grant holders, staff, volunteers, policymakers, or other individual that were not initially members of the research....

Procedure:

Before Site Visit:

- Prior to any contact with children, the CREA organizer of the visit will provide expectations to visitor(s).
- The organizer of the visit will provide a copy of CREA's child protection policy to site visitor(s) prior to visit. CREA visitor(s) must review the policy and return a signed child protection policy acknowledgement to the organizer of the visit.
- Retain signed copies of child protection policy acknowledgements per standard CREA policies and practice.
- If a visitor participates in multiple visits annually, he/she only needs to sign a policy acknowledgement once each year.
- In some cases, staff at sites will have additional Child Safeguarding or Ethics Conduct forms for visitor(s) to review and sign.

- 1.2 Adhere to the two-adult rule, as outlined in the Child Protection Policy.

Procedure:

During Site Visit:

- Children must never be left alone with visitor(s). CREA staff must adhere to the two-adult rule: two or more adults are required to supervise all activities where children are involved and are present at all times.

- 1.3 Protect the privacy and sensitive personal information of children and families.

Procedure:

Before Site Visit:

- Site staff must explain the content release form to all participants of the upcoming visit, including all caretakers, guardians, parents of children at the site. If an adult or

guardian/caretaker of a child has not signed the form prior to the visit, they cannot be included in photographs, video, quotes or other materials intended for publication, marketing or other use that are gathered during the visit. Copies of the release forms should be filed at the site as per standard CREA policies and practices.

During Site Visit:

- Do not share children's full names or locations on social media. Turn off location devices that automatically populate the location on social media. Publications and/or information shared through social media should be in compliance with the privacy regulations determined at each host centre.
- After Site Visit:
 - Do not share children's full names or locations on social media. Publications and/or information shared through social media should be in compliance with the privacy regulations determined at each host centre.

1.4 Ensure all site visits are authorized, and visit procedures are followed.

Procedure:

Before Site Visit:

- The program office for the site must secure parental/guardian/centre permission for the visit via a signed consent form.

During Site Visit:

- If a visitor arrives at a program office or site unexpectedly requesting a visit, staff should explain that a visit cannot take place because the proper forms and background checks have not been completed and notify the project's PI. Under no circumstances should a CREA guest visit a child or collaborating centre unannounced.

ANNEX III: CHILD SAFEGUARDING ACKNOWLEDGEMENT

I acknowledge that I have been provided with and have reviewed CREA's Policy on Child Protection with the effective date of November 1st, 2018 (the "Policy"). **I agree to comply with all aspects of the Policy, and I understand that my ongoing compliance with the Policy is a condition required for my participation in any CREA research or activity involving children.**

This Child Safeguarding Acknowledgement shall have effect for a period of one (1) year from the date on which it has been signed as indicated below.

Signature: _____ Name: _____ Date: _____