

Comic Relief Inc. Safeguarding Policy
Approved by the Board Of Directors Subcommittee on September 9th, 2018



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1. Background Information

1.1. Main Contacts

Permanent Safeguarding Officer:
Kristin Ellington, SVP Operations & Finance
Email: safeguarding@comicrelief.org

Safeguarding Compliance Officer:
Emma Leavy, Director of Grants Programs
Email: safeguarding@comicrelief.org

1.2. About Comic Relief Inc.:

Comic Relief Inc. is a nonprofit organization committed to creating a just world free from poverty by harnessing the power of entertainment to promote positive change. Our primary initiative is Red Nose Day whose goal is to end child poverty. As a major foundation supporting grantee partners in the United States and around the world, our funds impact millions of children each year. With our focus on ensuring that children remain safe, healthy, and educated, Comic Relief recognizes that we must do all in our power to ensure the dignity and wellbeing of each child and adult with whom we interact. This policy provides the guidelines and principles for our organization to ensure that we hold ourselves, our partners, and our grantees to the highest standards in protecting children and vulnerable adults.

1.3. Definitions:

‘Child’ refers to an individual under 18 years of age and in some cases this may be expanded to include young people up to 25 years of age.

‘Vulnerable adult’ refers to an individual over 18 years of age and in some cases over 25 years of age who is at an increased risk of exploitation, abuse, neglect, or maltreatment due to their particular or societal circumstance.

Abuse or maltreatment constitutes all forms of physical and/or emotional mal-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation (as defined in Addendum 1) resulting in actual or potential harm to the child/vulnerable adult's health, survival, development or dignity in the context of a relationship of responsibility, trust, or power.

'Comic Relief' refers to Comic Relief Inc., Red Nose Day, Hand in Hand, Flying Start Fund, and all other initiatives and funds under the umbrella of the Comic Relief USA brand and organization.

'Working with Children' or 'Working with Vulnerable Adults' is defined as those who are engaged in an activity, on behalf of or funded by Comic Relief, which involves direct contact with, or facilitates access to, children/vulnerable adults.

2. Safeguarding Principles

Comic Relief's Safeguarding Policy is undergirded by the following principles:

- All people have the right to live, learn, and develop in a safe and inclusive environment, free from all forms of abuse, violence, neglect, and exploitation.
- All individuals and organizations working with children/vulnerable adults directly or indirectly, including both service providers and funders, have a responsibility to foster a caring and protective environment for the people they impact and always act in the best interest of the person.
- Some children and adults are more vulnerable than others to abuse, and organizations working with children/vulnerable adults need to take steps to assess and address the different levels of risk that children/vulnerable adults in their programs may face.
- Everyone has the right to be treated with dignity and respect and not be discriminated against based on race, color, religion, gender, age, national origin, marital status, disability, veteran status, sexual orientation, or any other classification protected by federal, state or local law.

3. Applicable Persons and Entities

This Policy applies to:

- Officers, Directors, employees, interns, and independent contractors of Comic Relief;
- Volunteers of Comic Relief and visitors authorized by Comic Relief ("Visitors") to grantees and to any Comic Relief event or site visit involving children.

All those covered by the Policy commit to respecting, promoting, upholding and protecting, at all times, the rights of the child as set out in United States law and in the UN Convention on the Rights of the Child as well as all applicable United States laws for vulnerable adults. We will treat any breach of this policy very seriously. For those who work for us, failure to follow this policy could lead to disciplinary action, which may ultimately result in dismissal. For those who work with us, we reserve the right to immediately terminate your contract and, for Directors, to commence a procedure for your removal.

Paragraph 6 of this Policy applies to:

- Major vendors or corporate partners with whom Comic Relief does business and who have a reasonable likelihood of interacting with children or vulnerable adults (“Vendors” or “Partners”);
- Grantees, including any organization or entity funded by Comic Relief or by one of its funds (“Grantees”).

For these individuals or entities, failure to follow this policy could result in the severing of the business or funder/grantee relationship, including the relinquishing of unspent funds on an existing grant. In all circumstances, we reserve the right to immediately inform the requisite authorities (and to take such action as may be appropriate).

4. Code of Conduct

Comic Relief outlines its standards for child and vulnerable adult safeguarding in accordance with United States Federal, State, Local, and Tribal laws when the child/vulnerable adult is located within the United States of America, on Tribal Lands, in U.S. Territories, and on U.S. military bases overseas. [Additional information on U.S. laws can be found here](#). When the child/vulnerable adult is located outside the United States, these standards remain in accordance with the United Nations Convention on the Rights of the Child and other applicable international standards on safeguarding vulnerable adults. [Additional information on international child protection can be found here](#). The policies outlined below further enhance and complement these robust laws and conventions.

Comic Relief code of conduct and policies regarding safeguarding children and vulnerable adults include the following:

Always treat children and vulnerable adults with **respect** regardless of their gender, ethnic or social origin, language, religious or other beliefs, disability, sexual orientation or other status.

Use **appropriate language and behavior** towards children and vulnerable adults that is in no way harassing, abusive, sexually provocative, or demeaning.

Sexual activity with children is prohibited regardless of the age of consent locally; mistaken belief regarding the age of a child is not a defense.

Engaging children in **any form of sexual activity**, including paying for sexual services, i.e. exchange of money, employment, goods, or services, is prohibited.

Sexual activity, including anything from inappropriate touching to rape, with vulnerable adults when the vulnerable adult does not or cannot consent is strictly prohibited.

Ensure that more than one adult is present when working in the proximity of children.

Use of any device to access, view, create, download or distribute **sexual images of children** is **prohibited**.

Physical punishment or discipline or use of physical force of any kind towards children/vulnerable adults is prohibited.

The use of **children for domestic or other labor is prohibited** when it is inappropriate for the child's age or developmental capacity, in breach of local law, interferes with the time available for education and recreational activities, or places them at significant risk of injury, exploitation, or abuse.

The use of **vulnerable adults** for free labor, indentured servitude, or otherwise underpaying for work in an exploitative manner, in breach of local law, is considered as modern-day slavery.

It is **not appropriate to spend time alone with children** away from others or to take other people's children to your home, especially where they will be alone with you.

All Officers, Directors, employees, interns, independent contractors, Visitors and volunteers to which this Policy applies should **immediately report any concerns**, suspicions, incidents or allegations of actual or potential child/vulnerable adult abuse or any breach of this Policy to the Safeguarding Officer (see Addendum 2).

No person who **makes a report in good faith** will be subject to any form of retaliation. A person may also make a report on an anonymous basis to r.scott@comicrelief.org.

5. Guiding Procedures for Policy Implementation

Comic Relief requires that its Officers, Directors, employees, interns, independent contractors, volunteers and Visitors comply with these Procedures as a matter of good practice.

5.1. Recruitment and Selection of Staff

Comic Relief acknowledges that creating safe environments for children and vulnerable adults starts with the appointment of suitably qualified, skilled, and vetted staff members who have the desired competencies and skills to carry out their functions in an effective, efficient, and safe manner. Comic Relief's recruitment and on boarding processes reflect our commitment to protect children and prevent abuse. This will include comprehensive, legally compliant background checks for new or existing staff who will come in direct contact with children and/or vulnerable adults as part of their employment or engagement with Comic Relief.

5.2. Engaging Contractors

When engaging Contractors to deliver services, responsibility rests with those Contractors to ensure that those delivering the service on their behalf understand the obligations and commitments outlined in this Policy. Comic Relief's contracts will include this obligation.

5.3. Working with Grantees

Comic Relief requires that all its Grantees develop and implement their own safeguarding policies and procedures which clearly set out the procedures, as well as the measures in place for implementation and training and communication of the Policy. Grantee's policies and procedures, or their plans to develop these, are a condition of funding or continued funding. Grantees that do not have child and vulnerable adult protection policies and procedures in place will be given one opportunity to develop these and will have the opportunity to allocate a reasonable portion of their grant towards this if needed. Grantees who fail to develop child and vulnerable adult protection policies and procedures within 12 months may have their funding suspended until they have appropriate policies and procedures in place. Comic Relief will reserve the right to request a copy of such policies and procedures from any Grantee.

5.4. Use of Media

Comic Relief will ensure that all images of children and vulnerable adults it uses for internal or external communication, in whichever format, are appropriate and do not in any way exacerbate risks to children and/or vulnerable adults. Specifically, Comic Relief will ensure that:

- If photographic or video content is going to be captured during a Comic Relief event or site visit, all people attending will be informed beforehand that their consent to being featured in such content is required and given the opportunity to opt out of participating. Partner organizations will need to sign a release stating that people present at the event have consented to being featured in photographic or video content.
- In situations where consent is required to use third-party created materials or images of people, Comic Relief must be confident that informed consent has been provided. This shall be done through formal agreements including Grant Agreements and a separate project release form as well as by those responsible for events and site visits.
- Inappropriate images of children/vulnerable adults (e.g. that could be deemed to be sexual or to portray nudity) will never be used.
- Images of children/vulnerable adults that portray them in a demeaning or disrespectful light will never be used.
- Images of children/vulnerable adults will not be accompanied by personal identification information such as name and place of abode, where this could make the child/vulnerable adult easily identifiable and traceable.
- Additional safety measures, as appropriate, shall be applied concerning the use of images of children/vulnerable adults who are known to have suffered abuse and are still at risk and the identities of such individuals.
- The Safeguarding Compliance Officer will help enforce these guidelines.

5.5. Reporting and Responding to Concerns

The process for reporting and processing suspected breaches of this policy are as follows:

1. Comic Relief shall designate an Officer or Employee to be the “Permanent Safeguarding Officer” for purposes of this Policy.
2. Any concern, suspicion, incident or allegation of actual or potential abuse or a breach of this Policy should be reported to the Permanent Safeguarding Officer at the earliest opportunity. With respect to any concern, suspicion, incident or allegation of actual or potential abuse by the individual then serving as the Permanent Safeguarding Officer or a breach of this Policy by the individual then serving as the Permanent Safeguarding Officer, then the CEO of Comic Relief shall be designated as the “Permanent Safeguarding Officer” with respect to such matter involving such individual.
3. Where the risk of harm to the child/vulnerable adult is high or if there is a medical emergency then the designated Permanent Safeguarding Officer should immediately report the matter to the emergency services and/or to local law enforcement if a crime has been committed or suspected.
4. Comic Relief staff members should prepare a written notification of the incident in the form set out in Addendum 2 (“Report”) providing as much detail as possible. The Report should be passed to the Permanent Safeguarding Officer within 24 hours.
5. The Permanent Safeguarding Officer will investigate the incident on a confidential basis and will work with the appropriate staff members, to address the concern and (if necessary), to take appropriate action. The Permanent Safeguarding Officer may, in his or her discretion, escalate any matter he or she is investigating to the CEO and/or the Chair of the Board of Comic Relief.
6. The Report of the complaint will be completed and stored securely and confidentially with the Permanent Safeguarding Officer.
7. Action on all incidents must be taken within 3 days of the Report being received by the Permanent Safeguarding Officer or a shorter period as may be required and recorded alongside the original complaint.
8. Comic Relief is committed to responding appropriately and effectively to all allegations and suspicions of abuse, both current and historical, through reporting mechanisms that are simple, clear, fair and accessible to all stakeholders, including children and vulnerable adults.
9. There is a mandatory obligation on all Officers, Directors, employees, interns, independent contractors, volunteers and Visitors to report concerns, suspicions, allegations and incidents that indicate actual or potential abuse of children/vulnerable adults and/or any other breaches of this Policy, through the relevant reporting mechanism set out in this Policy.
10. Investigations will be guided by external professional expertise and support when required. Comic Relief will strive to maintain confidentiality to protect the affected individual(s) subject to its goal of engaging in a thorough investigation. Comic Relief may, however, be required to disclose the allegations or result of the investigation to third parties including but not limited to the relevant authorities.



5.6. Awareness Raising and Training

Comic Relief will ensure that all Officers, Directors, employees, interns, independent contractors, volunteers and Visitors working directly or indirectly with children and/or vulnerable adults receive appropriate training or briefing on the Policy.

Further learning and development opportunities will be made available for individual staff members if needed.

5.7. Monitoring and Reviewing

Comic Relief will ensure that implementation of this Policy is subject to regular monitoring. The Policy will be reviewed annually and whenever there are legislative changes or guidance issued that may impact the Policy, appropriate changes will be recommended to the Comic Relief Board of Directors for approval.

6. Working with Vendors, Corporate Partners and Grantee Partners

Comic Relief requires that its major Vendors and Corporate Partners and Grantee Partners develop and implement their own safeguarding policies and procedures which clearly set out the procedures as well as the measures in place for implementation and training, communication of the Policy, and monitoring and review. Vendors, Partners and Grantees that do not have appropriate child protection policies and procedures in place will be given one opportunity to develop such policies.

Addendum 1- Definitions of Harm

It is difficult to define 'harm' to children and vulnerable adults because children and vulnerable adults can be abused in so many ways depending on the context and culture. They may be abused in a family, an institution, community or faith setting, or via social media/ the internet. They may be harmed by an adult or adults or a child or children. There are also practices such as female genital mutilation (FGM) that cause significant harm to children.

The following definitions can be used as a guide:

Physical abuse: actual or potential physical harm perpetrated by another person, adult or child. It may involve hitting, shaking, poisoning, drowning, or burning. Physical harm may also be caused when a parent or care giver fabricates the symptoms of or deliberately induces illness in a child/vulnerable adult.

Sexual abuse: forcing or enticing a child/vulnerable adult to take part in sexual activities that he or she does not fully understand and has little choice in terms of providing consent. This may include, but is not limited to, rape, oral sex, penetration, or non-penetrative acts such as masturbation, kissing, rubbing and touching. It may also include involving children/vulnerable adults in looking at, or producing sexual images, watching sexual activities, and encouraging children/vulnerable adults to behave in sexually inappropriate ways.

Child/vulnerable adult sexual exploitation: a form of sexual abuse that involves children/vulnerable adults being engaged in any sexual activity in exchange for money, gifts, food, accommodation, affection, status, or anything else that they or their family needs. It usually involves a child/vulnerable adult being manipulated or coerced, which may involve befriending children/vulnerable adults, gaining their trust, and subjecting them to drugs and alcohol. The abusive relationship between victim and perpetrator involves an imbalance of power where the victim's options are limited. It is a form of abuse that can be misunderstood by children and adults as consensual. Child/vulnerable adults sexual exploitation manifests in different ways. It can involve a perpetrator exercising financial, emotional or physical control over a young person or vulnerable adult. It can involve peers manipulating or forcing victims into sexual activity, sometimes within gangs and in gang-affected neighborhoods. It may also involve opportunistic or organized networks of perpetrators who profit financially from trafficking victims between different locations to engage in sexual activity with multiple people.

Neglect and negligent treatment: allowing for context, resources and circumstances, neglect and negligent treatment refers to a persistent failure to meet a child/vulnerable adult's basic physical and /or psychological needs, which is likely to result in serious impairment of a child/vulnerable adult's healthy physical, spiritual, moral, and mental development. It includes the failure to properly supervise and protect children/vulnerable adults from harm and provide for nutrition, shelter and safe living/working conditions. It may also involve maternal neglect during pregnancy as a result of drug or alcohol misuse and the neglect and ill treatment of a disabled child/vulnerable adult.



Emotional abuse: persistent emotional maltreatment that impacts a child’s emotional development or a vulnerable adult’s well-being. Emotionally abusive acts include restriction of movement, degrading, humiliating, bullying (including cyber bullying), and threatening, scaring, discriminating, ridiculing or other non- physical forms of hostile or rejecting treatment.

Commercial exploitation: exploiting a child/vulnerable adult in work or other activities for the benefit of others and to the detriment of the child/vulnerable adult’s physical or mental health, education, moral or social-emotional development. It includes, but is not limited to, child labor and modern slavery.

Addendum 2: Safeguarding Incident Reporting Form



[Comic Relief Inc. Safeguarding Incident Reporting Form](#)

VICTIM & PARENT/GUARDIAN DETAILS	
VICTIM Name:	Age: Gender: <input type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Other
Address:	
Date of Birth:	
Language/s spoken:	
Any Disability:	
School:	Class: Teacher:
Name and contact details of parents/legal guardians/care takers (delete as appropriate):	
Parent/Guardian Name:	Age: Gender: <input type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Other
Address:	
Date of Birth:	
Language/s	
Any Disability	
Is the parent/guardian aware of the incident? Do not inform them without clearing through the Permanent Child Protection Officer if they are potentially involved in the abuse:	
DETAILS OF THE ALLEGED PERPETRATOR / SUBJECT OF SAFEGUARDING CONCERN:	
Name:	Age: Gender: <input type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Other
Nationality:	
Address/Current Location:	
Language/s spoken:	
Relationship to victim:	
Occupation:	Employer:
Any other details (including physical description, current whereabouts):	
Attach any ID	
PERSON WHO REPORTED THE ALLEGED SAFEGUARDING INCIDENT OR CONCERN:	
Name: _	Gender: <input type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Other
Position in / relation to Comic Relief:	
Reported to:	
Name: _	Gender: <input type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Other
Position in / relation to Comic Relief:	
Date of the incident:	
Location of the incident:	
DETAILS OF WITNESS(ES)	
Name:	Gender: <input type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Other
Telephone:	

E-mail:

Position in or relationship to Comic Relief:

Relationship to child / young person:

EXTERNAL AGENCIES OR PEOPLE CONTACTED (IF ANY):

Date:

Time:

Name of agency:

Contact at Agency:

Name:

Gender: Male Female Other

Address:

Telephone:

E-mail:

OTHERS:

Nature of the Concern:

Include full details of the nature of the concern:

- Details of the allegation
- What did the victim or informant say?
- What physical signs or behavioral indicators did you witness
- How has the victim's behavior changed? Add any relevant observations.
- How did you respond to the victim?
- Who has been informed?