



The Blue Atlas Project Child and Vulnerable Adult Safeguarding Policy

A. PURPOSE The purpose of the Blue Atlas Project (BA)'s Child and Vulnerable Adult Safeguarding Policy is (1) to ensure that BA projects, volunteers, workers, or others working with or on behalf of the BA do no harm to children and/or vulnerable adults and (2) to ensure that safety risks and cases of misconduct are identified, reported, and addressed in an appropriate and timely manner.

B. SCOPE BA's Child and Vulnerable Adult Safeguarding Policy pertains to all its "Representatives," including BA's Board members, Volunteers, Workers, Suppliers/Subcontractors, Sub-awardees, Implementing Partners, and Visitors who have direct contact with children and/or vulnerable adults through projects that are implemented or financially supported by BA.

C. DEFINITIONS - See Attachment 1

D. POLICY STATEMENTS

In accordance with Article 19 of the United Nations Convention on the Rights of the Child (UNCRC), the Blue Atlas Project (BA) recognizes the right of all children to be protected from all forms of abuse and exploitation. Additionally, BA believes that international human rights law provides the right to be free from abuse, exploitation, and harassment. BA further recognizes its responsibility to ensure that BA projects, Representatives, and others working with or on behalf of the BA do no harm to children and/or vulnerable adults.

Persons covered by this policy shall not engage in any practice inconsistent with the rights set forth in the Convention on the Rights of the Child, including Article 32 thereof, which, inter alia, requires that a child shall be protected from performing any work that is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral, or social development.

BA is committed to ensuring that our organizational policies, protocol, procedures, and actions reflect our commitment to fulfilling this responsibility.

1. Zero Tolerance

BA has a zero tolerance policy regarding the abuse and exploitation of children and/or vulnerable adults. BA Representatives are prohibited from engaging in any form of abuse or exploitation of children and/or vulnerable adults and are required to report all suspicions and allegations.

2. Policy Implementation

BA shall implement the Child and Vulnerable Adult Safeguarding Policy and monitor its application over time. In addition to BA's Child and Vulnerable Adult Safeguarding Policy, BA is also committed to making all efforts to ensure that BA Representatives comply with the BA Code of Conduct and BA's Ethical Guidelines.

3. Recruitment

BA is committed to ensuring that BA workers and representatives are suitable to work with children and/or vulnerable adults and are informed of their responsibility to uphold and abide by the BA's Child and Vulnerable Adult Safeguarding Policy.

3.1 Reference checks, criminal background checks, or other available means are conducted prior to an employment offer being extended to all BA staff, including those who will be in direct contact with children and/or vulnerable adults.

3.2 Candidates for posts involving direct contact with children and/or vulnerable adults are specifically vetted through targeted questioning.

3.3 Staff orientation materials and employment contracts and agreements for new and returning staff members include the responsibility to abide by the Child and Vulnerable Adult Safeguarding Policy.

4. Behavioral Protocol

BA is committed to ensuring representatives conduct themselves in a way that is safe for children and/or vulnerable adults.

4.1 BA Representatives are required to comply with the behavioral protocol outlined below:

4.1.1 BA Representatives must *not*:

- a.** Physically punish or discipline child beneficiaries.
- b.** Do things for children of an intimate, personal nature that they can do for themselves.
- c.** Act in ways intended to shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of emotional abuse.
- d.** Engage in sexual activity with children, regardless of the age of consent locally.
- e.** Use language or behavior around or towards children that is inappropriate, harassing, abusive, sexually provocative, or demeaning.
- f.** Invite child beneficiaries into their accommodation (including home, guesthouse, hotel, apartment, etc.), unless the supervisor has agreed that it is necessary for the protection of the child.
- g.** Sleep in the same bed or room as a child beneficiary.
- h.** Discriminate against, show differential treatment to, or favor particular children to the exclusion of others.
- i.** Hire children for domestic or other labor which violates national labor laws, is inappropriate given their age or developmental stage, interferes with their education or recreational activities, or places them at significant risk of injury.

- j. Develop relationships with children that could in any way be deemed inappropriate, exploitative, or abusive.
- k. Use any computers, mobile phones, video cameras, or social media to harass children.
- l. Access child pornography through any medium.

4.1.2 BA Representatives *must*:

- a. Ensure wherever possible that when working with individual children, another adult is present.
- b. Ensure that images taken of children (e.g., photographs and videos) are accurate and respect children's privacy and dignity. Children must be adequately clothed in images. Sexually suggestive poses are prohibited.
- c. Abide by BA's Ethical Guidelines when working with or questioning children.
- d. Obtain informed consent from children and their caregivers before taking photographs of them, except under exceptional circumstances where this may not be possible or may not be in the best interest of the child. When possible and appropriate, this consent should be in writing and children and caregivers should be informed of how the images will be used.
- e. Restrict use of images of child beneficiaries to professional, respectful, awareness raising, fundraising, publicity, and programmatic purposes.
- f. Ensure that any image or recorded case history of a child does not place him/her at risk or render him/her vulnerable to any form of abuse.
- g. Respect principles of confidentiality abide by applicable data protection protocols, and only share children's personal information on a need-to-know basis.
- h. Make all effort to minimize risk of harm to child beneficiaries.
- i. Immediately report suspicion or allegations of child abuse or exploitation or policy non-compliance to local authorities and/or in accordance with the direction of BA Management.

4.2 BA ensures that representatives are informed of their obligation to abide by the behavior protocol outlined herein and to abide by this policy.

4.2.1 The BA Child Safeguarding Policy is distributed to and reviewed with the all personnel.

4.2.2 BA ensures that all personnel are aware of the existence and requirements of the Child and Vulnerable Adult Safeguarding Policy.

4.3 BA informs Visitors of this policy where/when appropriate, and where Visitors will be in direct contact with children and/or vulnerable adults.

4.4 BA Representatives must provide information to beneficiaries they are working with about BA, the principles it adheres to, how it expects its staff to behave, the programs it is implementing and what they intend to deliver.

5. Training

BA committed to ensuring that BA representatives have the knowledge they need to uphold and abide by this Policy.

5.1 BA will include information on the BA's Child and Vulnerable Adult Safeguarding Policy in its orientation materials.

5.2 BA provides basic orientation with respect to its behavioral requirements to new personnel as part of orientation and to existing personnel annually.

6. Communications

BS is committed to ensuring that depictions of children—in words and images—protect their identity and respect their dignity and rights. BA is committed to ensuring that depictions of vulnerable adults respect their dignity and their rights.

6.1 The following standards guide BA communications about children:

6.1.1 Depictions of children must respect children's privacy and present children in a respectful, dignified manner.

6.1.2 Children must be adequately clothed in images. Sexually suggestive poses are not permitted.

6.1.3 Informed consent must be obtained from children and their caregivers before taking photographs of them, except under exceptional circumstances where this may not be possible. When possible and appropriate, this consent should be in writing and children and caregivers should be informed of how the images will be used.

6.1.4 Use of images of child beneficiaries shall be restricted to professional, respectful, awareness raising, fundraising, publicity, and programmatic purposes.

6.1.5 Caution must be taken to ensure that no image or recorded case history of a child places him/her at risk or renders him/her vulnerable to any form of abuse.

7. Safety, Security, and Dignity

BA is committed to ensuring that no harm, whether intentional or unintentional, comes to children as a result of BA projects.

7.1 Where BA has direct responsibility for running activities for children, children must be adequately supervised at all times.

7.2 BA Representatives should, where possible, ensure that proposals demonstrate that the risks children and/or vulnerable adults may face as a result of a project have been identified and addressed, and will be monitored.

7.3 To ensure that no harm comes to children and/or vulnerable adults as result of collecting or storing their personal information, BA Representatives must comply with the data protection protocol below:

7.3.1 Prior to collecting personal information from a child and/or vulnerable adult, BA Representatives must identify and take steps to address potential risks related to the collection and storage of such children's and/or vulnerable adult's data.

7.3.2 Prior to collecting personal information from a child and/or vulnerable adult, BA Representatives must explain to the child and/or vulnerable adult what information will be collected, and how it will be used and stored.

7.3.3 Informed consent must be obtained from the child and/or vulnerable adult before collecting or sharing his or her information. If the child is not old enough to provide informed consent, where possible this should be sought from the child's caregiver. If the vulnerable adult is not able to provide informed consent, where possible this should be sought from the vulnerable adult's caregiver.

7.3.4 BA Representatives must only collect information that is necessary and/or that the child and/or the vulnerable adult wants to provide.

7.3.5 Information collected about children and/or vulnerable adults must only be shared with others on a need-to-know basis and must only be shared when it is in the best interests of the child and/or the vulnerable adult.

7.3.6 Information should be collected, stored, and shared in accordance with applicable laws, including applicable data security and privacy laws.

7.3.7 Information collected about children must be stored in a way that complies with *Standard 5* of the *Minimum Standards for Child Protection in Humanitarian Settings*.

8. Reporting and Response

BA is committed to ensuring that allegations of violations of the Child and Vulnerable Adult Safeguarding Policy are reported, investigated, and responded to in a timely, fair, transparent, and consistent manner.

8.1 Beneficiaries shall be informed, to the extent possible, of the BA's commitments to children and vulnerable adults under the Child and Vulnerable Adult Safeguarding Policy and shall be informed of how to report suspected violations of these commitments. Local reporting mechanisms may vary based on the context, but beneficiaries shall always be informed that violations can be reported by sending an email to kali@blueatlasproject.org or by calling +1 937.725.7762 and leaving a message that the caller wishes to discuss an ethics issue.

8.2 WRC Representatives are required to report and record allegations of violations of this policy in accordance with this Child and Vulnerable Adult Safeguarding Policy, WRC's Complaints Mechanism and/or WRC's Whistleblower Policy. All reports shall be dealt with in accordance with WRC's Complaints Mechanism and/or WRC's Whistleblower Policy.

8.4 Failure of BA Workers to uphold or comply with the Child and Vulnerable Adult Safeguarding Policy is grounds for disciplinary action up to and including termination of employment or contract.

8.5 Violations of the child and vulnerable adult safeguarding expectations outlined in contracts, agreements, or MoUs with Sub-awardees, Suppliers/Sub-contractors, or Implementing Partners shall be grounds for termination of contract or agreement.

9. Compliance with Donor Requirements

BA is committed to making all effort to ensure that all personnel and implementing partners comply with the child and vulnerable adult protection/safeguarding policy requirements set forth by donors.

9.1 Where donors require child and vulnerable adult safeguarding measures that exceed those outlined in the BA's Child and Vulnerable Adult Safeguarding Policy, relevant BA activities and actions must comply with those measures.

9.2 Workers, volunteers and implementing partners who have direct contact with children and/or vulnerable adults through projects implemented or financially supported by BA must agree to comply with the child and vulnerable adult protection/safeguarding policy requirements set forth by both donors and BA for that project.

10. Management

BA is committed to putting in place a clearly defined structure to ensure coordinated and consistent implementation and monitoring of this policy.

10.1 BA's Founder is responsible for ensuring implementation and monitoring of BA's Child and Vulnerable Adult Safeguarding Policy. Her responsibilities includes:

10.1.1 Responding to reports of child and/or vulnerable adult exploitation and abuse, and policy non-compliance.

10.1.2 Monitoring implementation of and compliance with this policy.

10.1.3 Ensuring that BA Representatives receive information on this policy.

10.1.4 Reviewing this policy periodically.

10.2 In general, all BA personnel are responsible for:

10.2.1 Ensuring compliance with BA's Child and Vulnerable Adult Safeguarding Policy.

10.2.2 Reporting and responding to reports of policy violations in accordance with this Policy, local statutes, laws and other applicable policies.

10.1.5 Providing supervision and support to BA members on monitoring implementation of this policy.

[1] United Nations Convention on the Rights of the Child, 1989, Article 1.

[2] United Nations Convention on the Rights of the Child, 1989. Article 19: 'State Parties shall protect the child from all forms of physical or mental violence, injury or abuse, neglect, maltreatment or exploitation, including sexual abuse.' <http://www2.ohchr.org/english/law/pdf/crc.pdf>.

[3] Examples include: International Convention on the Elimination of All Forms of Racial Discrimination; International Covenant on Civil and Political Rights; Convention on the Elimination of All Forms of Discrimination against Women; Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment; Convention on the Rights of the Child, Convention on the Rights of Person with Disabilities.

Attachment 1 – Definitions:

A. **Child** – For purpose of this policy, a child is defined as anyone under the age of eighteen years, in accordance with Article 1 of the UN Convention on the Rights of the Child.¹

B. **Child Abuse and Exploitation** – For purpose of this policy, “child abuse” and “child exploitation” shall mean any and 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 the child’s health, survival, development, or dignity in the context of a relationship of responsibility, trust, or power.

C. **Child Beneficiary**—For the purpose of this policy, “child beneficiary” refers to a child who benefits from or comes into contact with projects implemented or financially supported by BA.

D. **Harm** – For the purpose of this policy, “harm” refers to physical or psychological injury or damage to a child’s health, survival, development, or dignity.

E. **Implementing Partners** – For the purpose of this policy, “Implementing Partners” refers to private and public entities, other than Sub-awardees or Suppliers/Sub-contractors, with which the BA has a contractual agreement or memorandum of understanding (MoU) for the purposes of project implementation.

F. **Representatives** – For the purpose of this policy, “Representatives” refers to BA’s Board members, BA Workers, Suppliers/Subcontractors, Sub-awardees, Implementing Partners and Visitors who have direct contact with children and/or vulnerable adults through projects implemented or financially supported by BA.

G. **BA Workers** – For the purpose of this policy, “BA Worker” refers to employees, fellows and interns, incentive workers, volunteers, contracted workers, consultants, and independent contractors.

H. **Visitors** – For the purpose of this policy, “Visitors” refers to individuals hosted by the BA, who are visiting projects implemented or financially supported by BA and are not BA Workers, or others involved in project implementation. It includes journalists, photographers, BA voices, board members, and donors, among others.

I. **Vulnerable Adults** – For the purpose of this policy, “vulnerable adult” refers to an adult who may be unable to take care of themselves or protect themselves from harm or exploitation. Such vulnerable adults may be at greater risk of abuse and exploitation due to a variety of risk factors, such as (without limitation) gender, gender identity or expression, health issues (including mental health), disabilities, age, sexual orientation, ethnic, geographic or national origin, family status, partnership status, race, religion or belief, economic background and particular trade or profession, or as a result of the impact of conflict and crisis.