



Comic Relief Inc. Child Protection Policy
Approved by Board of Trustees on 12/4/17

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1. Background Information

1.1. [Main Contacts](#)

Permanent Child Protection Officer:
Rick Scott, SVP Grants & Philanthropy
Email: r.scott@comicrelief.org

Child Protection Compliance Officer:
Emma Leavy, Grants Manager
Email: e.Leavy@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. 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.

1.3. [Definitions:](#)

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



Child 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'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' 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.

2. Child Protection Principles

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

- All children 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 young people directly or indirectly, including both service providers and funders, have a responsibility to foster a caring and protective environment for the young people they impact and always act in the best interest of the child.
- Some children are more vulnerable than others to abuse, and organizations working with children need to take steps to assess and address the different levels of risk that children in their programs may face.
- Everyone has the right to be treated with dignity and respect and not be discriminated against based on age, gender, race, ethnicity, ability, sexual orientation, beliefs, religious or political affiliation.
- While these standards have been developed in relation to children (aged under 18), they can also provide a valuable framework for good practice in relation to other stakeholder groups such as young or vulnerable adults.

3. Applicable Persons and Entities

This policy applies to:

- Employees, interns, and volunteers of Comic Relief;
- Trustees and advisors of Comic Relief;
- Associates and partners of Comic Relief including supporting foundations, corporate partners, and any other key stakeholders;
- Volunteers and visitors to grantees and to any event or site visit involving children;
- Contractors, which includes any organizations or individuals which a Comic Relief entity instructs to deliver services (including consultants and service providers); and,
- Grantees which include any organization or entity funded by Comic Relief or by one of its funds.



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. 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 trustees, to require you to immediately resign. For those receiving grants or contributions from us, failure to follow this policy could result in the severing of the funder/grantee relationship, including the relinquishing of all 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 protection in accordance with United States Federal, State, Local, and Tribal laws when the child 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 is located outside the United States, these standards remain in accordance with the United Nations Convention on the Rights of the Child. [Additional information on international child protection can be found here](#). The policies outlined below further enhance and compliment these robust laws and conventions.

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

Always treat children 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 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.

Wherever possible, **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 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.

It is **inappropriate 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 Staff, Trustees, Associates, Contractors, and Grantees to which this Policy applies should **immediately report any concerns**, suspicions, incidents or allegations of actual or potential child abuse or any breach of this Policy to the Child Protection Officer (see Addendums 2 & 3).

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@comicroelief.org.

5. Guiding Procedures for Policy Implementation

Key procedures are outlined below and reflected in the Child Protection Reporting Flow Chart listed in Addendum 2. Comic Relief requires that its Staff, Directors, Trustees, Grantees, Associates, and Contractors 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 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 background checks that will include CRB (or equivalent) checks for new or existing staff who will come in direct contact with children.

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 child protection 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. Grantee's policies and procedures, or their plans to develop these, are a condition of funding

and will be monitored during the grant management cycle. Comic Relief will, where possible, try to provide support for Grantees to develop and implement robust child protection policies and procedures. Grantees that do not have appropriate child protection policies and procedures in place will be given 12 months to develop these and will have the opportunity to allocate a reasonable portion of their grant towards this if needed. Grantees must demonstrate to Comic Relief that appropriate child protection policies and procedures are in place and that they are being adhered to by staff. Grantees who fail to develop appropriate child protection policies and procedures within 12 months will have their funding suspended until they have appropriate policies and procedures in place. Comic Relief's Contribution and Grant Agreements will have this provision included in its language.

5.4. Use of Media

Comic Relief will ensure that all images of children it uses for internal or external communication, in whichever format, are appropriate and do not in any way exacerbate risks to children. 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 young 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 young people present at the event have consented to being featured in photographic or video content.
- No content of children will be used unless Comic Relief is 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 or young people (e.g. that could be deemed to be sexual or to portray nudity) will never be used.
- Images of children or young people that portray them in a demeaning or disrespectful light will never be used.
- Images of children will not be accompanied by personal identification information such as name and place of abode, where this could make the child easily identifiable and traceable.
- The use of images of children, where the child has already suffered abuse, will have additional safety measures applied, as appropriate.
- The Child Protection 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. Any concern, suspicion, incident or allegation of actual or potential child abuse or a breach of this Policy should be reported to the Permanent Child Protection Officer at the earliest opportunity.

2. If the incident or alleged incident takes place during an event or site visit in which Comic Relief is involved, then the report should be made to the designated on site Child Protection Officer and notified to the Permanent Child Protection Officer immediately but no later than within 24 hours.
3. Where the risk of harm to the child is high or if there is a medical emergency then the designated Child Protection Officer should immediately report the matter to the emergency services and/or to local law enforcement if a crime has been committed or suspected and shall then complete the notification to the Permanent Child Protection Officer.
4. Comic Relief staff members should prepare a written notification of the incident in the form set out in Addendum 3 (“Report”) providing as much detail as possible. The Report should be passed to the Permanent Child Protection officer no later than 24 hours.
5. The Child Protection Officer will investigate the incident on a confidential basis and will work with the appropriate staff members, including the Compliance Officer, to address the concern and (if necessary), to take appropriate action. The investigation will consider:
 - a. If the child is at immediate risk, or needs immediate support, then there is an immediate need to contact local social care services;
 - b. If the incident is a criminal matter, the police or appropriate law enforcement should be contacted;
 - c. Where the incident concerns a Contractor, the Contractor organization may need to be notified, and followed up in due course;
 - d. Where the incident concerns a Comic Relief staff member, Director, or Trustee, the Permanent Child Protection Officer and HR Manager will together decide on the appropriate course of action.
6. The Report on the complaint will be completed and stored securely and confidentially with the Permanent Child Protection Officer.
7. Action on all incidents needs to be taken within 3 days of the Report being received by the Permanent Child Protection 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.
9. There is a mandatory obligation on all Staff, Associates, Trustees, Grantees, and Contractors to report concerns, suspicions, allegations and incidents that indicate actual or potential abuse of children and/or any other breaches of this Policy, through the relevant reporting mechanism set out in this Policy.
10. All those subject to complaints will be treated fairly and consistent with the principles of natural justice (i.e. rule against bias and the right to a fair hearing). Investigations will be objective, transparent, and will be guided by external professional expertise and support when required. To the extent practical, 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 the relevant authorities.



5.6. Awareness Raising and Training

Comic Relief will ensure that all Staff, Trustees, and Associates working directly or indirectly with children receive appropriate training or briefing on the Policy. This will be conducted regularly by the Permanent Child Protection Officer and/or Compliance Officer.

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 Trustees for approval.

Please note: this document is based on the Laureus Child Protection Policy from the Laureus Sport for Good Foundation, who gave Comic Relief Inc. permission to use and adapt it.

Addendum 1- Definitions of Harm

It is difficult to define ‘harm’ to children because children 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 another 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.

Sexual abuse: forcing or enticing a child 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 in looking at, or producing sexual images, watching sexual activities, and encouraging children to behave in sexually inappropriate ways.

Child sexual exploitation: a form of sexual abuse that involves children 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 being manipulated or coerced, which may involve befriending children, 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 sexual exploitation manifests in different ways. It can involve an older perpetrator exercising financial, emotional or physical control over a young person. 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 young 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’s basic physical and /or psychological needs, which is likely to result in serious impairment of a child’s healthy physical, spiritual, moral, and mental development. It includes the failure to properly supervise and protect children 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.

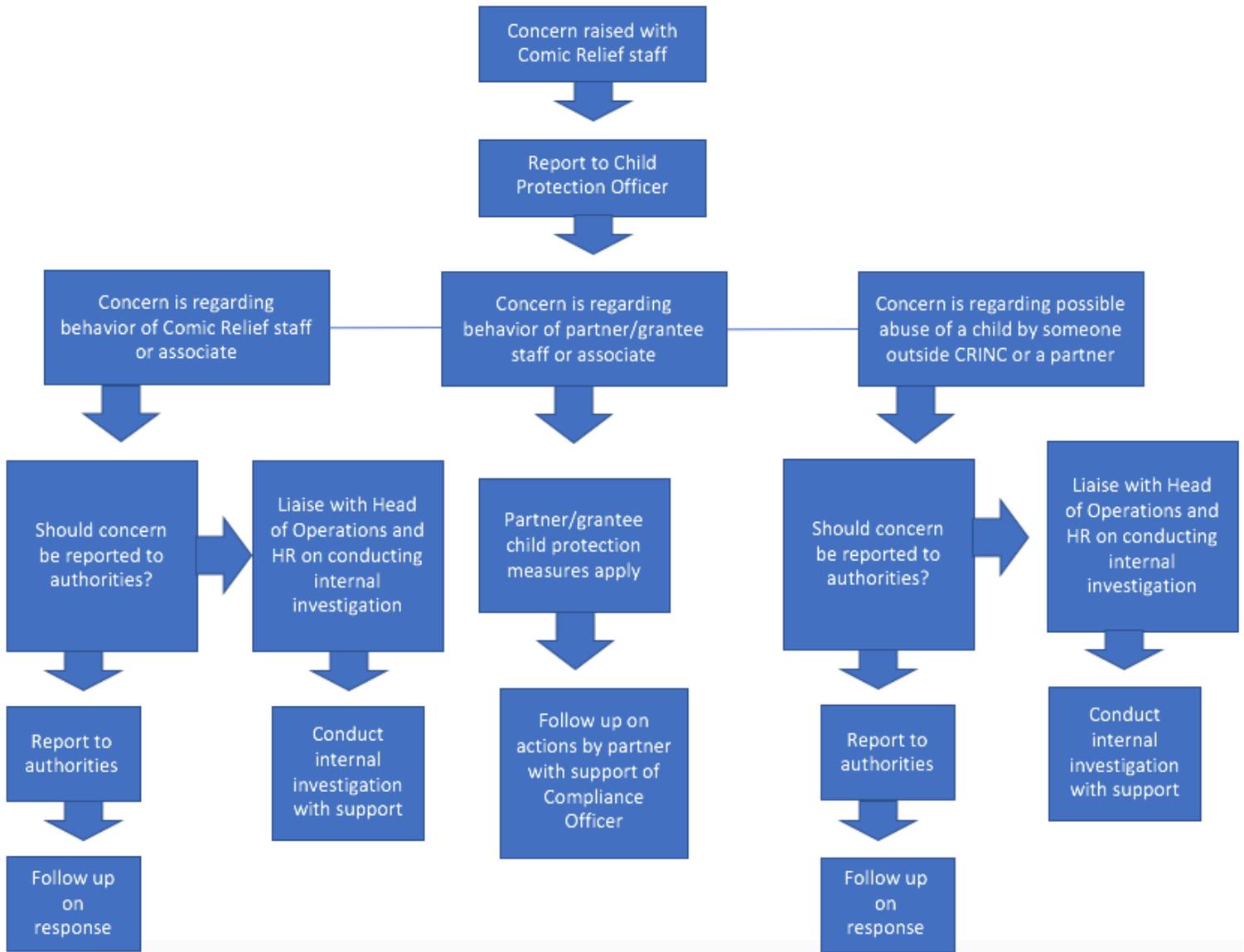


Emotional abuse: persistent emotional maltreatment that impacts a child's emotional development. Emotionally abusive acts include restriction of movement, degrading, humiliating, bullying (including cyber bullying), and threatening, scaring, discriminating, ridiculing or other non- physical forms of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

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



Addendum 2- Child Protection Reporting Flow Chart





Addendum 3: Child Protection Incident Reporting Form

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

CHILD & PARENT/GUARDIAN DETAILS		
Child 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):		
<hr/>		
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 CHILD PROTECTION 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 CHILD PROTECTION 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: Male Female 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 child or informant say?**
- **What physical signs or behavioral indicators did you witness**
- **How has the child’s behavior changed? Add any relevant observations.**
- **How did you respond to the child?**
- **Who has been informed?**