WOMEN’S REFUGEE COMMISSION, INC.
CHILD AND VULNERABLE ADULT SAFEGUARDING POLICY

A. PURPOSE

The purpose of the Women’s Refugee Commission (WRC)’s Child and Vulnerable Adult Safeguarding Policy is (1) to ensure that WRC projects, workers, or others working with or on behalf of the WRC 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

The WRC’s Child Safeguarding Policy pertains to all its “Representatives” including WRC’s Board members, WRC Workers, Suppliers/Subcontractors, Sub-awardees, Implementing Partners and Visitors who have direct contact with children through WRC implemented or financially supported projects.

C. 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 all children who benefit from or come into contact with WRC implemented or financially supported projects.

D. Harm – For 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

WRC 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 WRC’s Board members, WRC Workers, Suppliers/Subcontractors, Sub-awardees, Implementing Partners and Visitors who have direct contact with children through WRC implemented or financially supported projects.

**G. Sub-awardees** – For the purpose of this policy, “Sub-awardees” refers to organizations to which an award of financial assistance is made under an award by the WRC when the WRC is the Award Holder (“prime” recipient).

**H. Suppliers/Sub-Contractors** – For purpose of this policy, “Suppliers/Sub-contractors” refer to individuals, companies, or organizations with whom the WRC has a contractual relationship for the provision of goods or services.

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

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

**K. 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.

**D. POLICY STATEMENTS**

In accordance with Article 19 of the United Nations Convention on the Rights of the Child (UNCRC)\(^2\), the WRC recognizes the right of all children to be protected from all forms of abuse and exploitation. Additionally, WRC believes that international human rights law provides the right to be free from abuse, exploitation and harassment.\(^3\) The WRC further recognizes its

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\(^3\) 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.
responsibility to ensure that WRC projects, Representatives, and others working with or on behalf of the WRC 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.

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

1. Zero Tolerance

The WRC has a zero tolerance policy regarding the abuse and exploitation of children. WRC 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

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

3. Recruitment

The WRC is committed to ensuring that WRC Workers are suitable to work with children and are informed of their responsibility to uphold and abide by the WRC’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 WRC staff, including those who will be in direct contact with children.

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

The WRC is committed to ensuring that WRC Representatives conduct themselves in a way that is safe for children and/or vulnerable adults.

4.1 WRC Representatives are required to comply with the behavioral protocol outlined below:
4.1.1 WRC 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 WRC 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 WRC’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 as outlined in this Child and Vulnerable Adult Safeguarding Policy and/or in accordance with the WRC’s Whistleblower Policy.
4.2 The WRC ensures that WRC Representatives are informed of their obligation to abide by the behavior protocol outlined above.

4.2.1 The WRC Child and Vulnerable Adult Safeguarding Policy is distributed to and reviewed with the all WRC Workers.

4.2.2 The WRC ensures that all WRC Workers are aware of the existence and requirements of WRC’s Child and Vulnerable Adult Safeguarding Policy.

4.3 The WRC informs Visitors of the WRC’s Child and Vulnerable Adult Safeguarding Policy where appropriate, and where Visitors will be in direct contact with children and/or Vulnerable Adults.

4.4 Sub-awardees, Suppliers/Sub-contractors and Implementing Partners who have direct contact with children through WRC implemented or financially supported projects must agree in writing to ensure that during their association with the WRC, they and their representatives comply with WRC’s Child and Vulnerable Adult Safeguarding Policy or their own code of conduct of a similar standard (which is reviewed by WRC).

4.5 WRC Representatives must provide information to beneficiaries they are working with about WRC, 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

The WRC is committed to ensuring that WRC Workers have the knowledge they need to uphold and abide by the WRC’s Child and Vulnerable Adult Safeguarding Policy.

5.1 The WRC includes information on the WRC’s Child and Vulnerable Adult Safeguarding Policy in its orientation materials.

5.2 The WRC provides basic orientation with respect to its behavioral requirements to new WRC Workers as part of orientation and to existing employees in all WRC offices on an ongoing basis.

6. Communications

The WRC is committed to ensuring that depictions of children—in words and images—protect their identity and respect their dignity and rights.

6.1 The following standards guide WRC 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.

6.2 The WRC is required to include these communications standards in WRC communications guidelines for WRC Workers, journalists, photographers, and Visitors to WRC projects.

7. Safety, Security, and Dignity

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

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

7.2 WRC 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, WRC Representatives must comply with the data protection protocol below:

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

7.3.2 Prior to collecting personal information from a child and/or such vulnerable adult, WRC Representatives must explain to the child and/or such 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 such 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 in a condition to provide informed consent, where possible this should be sought from such vulnerable adult’s caregiver.
7.3.4 WRC Representatives must only collect information that is necessary and/or that the child and/or vulnerable adult wants to provide.

7.3.5 Information collected about children and/or vulnerable adult 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 such 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

The WRC 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 WRC’s commitments to children 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 ethics@wrcommission.org or by calling +1.212.551.3115 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 the 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.

8.3 Investigation of violations of the Child and Vulnerable Adult Safeguarding Policy shall be made in accordance with WRC’s Complaints Mechanism and/or WRC’s Whistleblower Policy, as applicable.

8.4 Failure of WRC 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. Disciplinary action will be determined in accordance with WRC’s Employee Handbook.

8.5 Sub-awardees, Suppliers/Sub-contractors, and Implementing Partners who have direct contact with children and/or vulnerable adults must be informed of the pathways for reporting violations of the Child and Vulnerable Adult Safeguarding Policy, or must agree upon other reporting processes. Any complaints or concerns should be reported by sending an email to ethics@wrcommission.org or by calling +1.212.551.3115 and leaving a message that the caller wishes to discuss an ethics issue.
8.6 Violations of the child and vulnerable adult safeguarding expectations outlined in contracts, agreements, or MoUs with Sub-awardawardees, Suppliers/Sub-contractors, or Implementing Partners shall be grounds for termination of contract or agreement.

9. Compliance with Donor Requirements

The WRC is committed to making all effort to ensure that the WRC and our Sub-awardees, Sub-contractors, 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 WRC’s Child and Vulnerable Adult Safeguarding Policy, relevant WRC departments, units, and programs shall make all effort to comply with those measures.

9.2 Sub-awardees, Suppliers/Sub-contractors, and Implementing Partners who have direct contact with children through WRC implemented or financially supported projects must agree to comply with the child and vulnerable adult protection/safeguarding policy requirements set forth by both donors and WRC for that project. These requirements shall be clearly outlined in WRC contractual agreements with Workers, Sub-awardees, Suppliers/Sub-contractors, and Implementing Partners.

9.3 Where a potential Sub-awardee, Supplier/Sub-contractor, or Implementing Partner has direct contact with children and/or vulnerable adults through WRC implemented or financially supported projects and does not have a child and vulnerable adult protection/safeguarding policy in place and/or is not able to meet the child and vulnerable adult protection/safeguarding policy requirements set forth by donors, the WRC will, where possible, work with the Sub-awardee, Supplier/Sub-contractor, or Implementing Partner by providing the support required to enable them to come into compliance.

10. Management

The WRC is committed to putting in place a clearly defined management structure to ensure coordinated and consistent implementation and monitoring of this policy throughout the organization.

10.1 The WRC’s Executive Director, along with the Vice President for Programs, the Chief Legal Officer and HR Director are responsible for ensuring implementation and monitoring of WRC’s Child and Vulnerable Adult Safeguarding Policy. Their responsibility 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 the policy.
10.1.3 Ensuring that WRC Representatives receive information on the policy.

10.1.4 Reviewing the policy periodically.

10.1.5 Providing supervision and support to the senior management on monitoring implementation of the policy.

10.2 Senior Management are responsible for:

10.2.1 Ensuring that WRC Representatives are familiar with WRC’s Child and Vulnerable Adult Safeguarding Policy, and are aware of their responsibilities in relation to this policy.

10.2.2 Working in collaboration with the WRC’s Executive Director, Vice President for Programs, Chief Legal Officer and HR Director on policy implementation and compliance within their office or program.

10.2.3 Ensuring that supervisors are able to receive, record, report and respond to allegations of exploitation or abuse, including of children and/or vulnerable adults.

10.2.4 Reporting alleged, suspected, or confirmed violations of the WRC’s Child and Vulnerable Adult Safeguarding Policy.

10.3 In general, department heads and supervisors are responsible for:

10.3.1 Ensuring that staff under their supervision comply with WRC’s Child and Vulnerable Adult Safeguarding Policy.

10.3.2 Reporting and responding to reports of policy violations in accordance with this Child and Vulnerable Adult Safeguarding Policy and/or the WRC’s Whistleblower Policy, WRC’s Complaints Mechanism and other applicable policies.

RELATED POLICIES
WRC Code of Conduct
WRC’s Ethical Guidelines
Whistleblower Policy
Complaints Mechanism
WRC’s Anti Bullying Policy

UPDATED: October 2019
By signing here I certify that I have read and understood the Women’s Refugee Commission, Inc.’s Child and Vulnerable Adult Safeguarding Policy.

_____________________
Signature

_____________________
Print Name

_____________________
Date