



**CREATIVE ASSOCIATES INTERNATIONAL
CHILD PROTECTION POLICY P-5.1.8 (F)**

1. Child Protection Policy

1.1 Introduction

The aim of the policy is to ensure children are safeguarded and their welfare is promoted in respect to their participation in activities in which Creative Associates International (Creative) is involved. Creative is committed to seek compliance with host country and local child welfare and protection legislation or international standards, whichever gives greater protection, and with U.S. law where applicable.

The definition of a child: every human being below the age of 18 years; unless, under national law majority is attained earlier, as per U.N Convention for the Right of the Child, 1989.

1.2 Policy Statement

Creative Associates International prohibits all personnel and consultants from engaging in child abuse, exploitation or neglect, and is committed to the following:

- The welfare of the child is paramount;
- All children, whatever their age, culture, ability, gender, language, racial origin, religious belief and/or sexual identity should be protected and their welfare safeguarded in activities in which Creative is involved;
- Taking all reasonable steps to protect children from harm, discrimination and degrading treatment and to respect their rights, wishes and feelings;
- All reasonable suspicions or allegations of poor treatment or abuse will be taken seriously, and responded to swiftly and appropriately.

2. Promoting Good Practice

2.1 Good Practice

All personnel and Consultants should adhere to the following principles and action:

- Work in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication);
- Make experiences of children involved in Creative activities fun, enjoyable and enriching; promote fairness, confront and deal with bullying;
- Treat all young people equally and with respect and dignity;
- Avoid unnecessary physical contact with young people. Where any form of manual/physical support is required it should be provided openly and with the consent of the young person. Physical contact can be appropriate so long as it is neither harmful nor offensive and the young person's consent has been given;
- Be an excellent role model;
- Always give enthusiastic and constructive feedback rather than negative criticism.

3. Defining Child Abuse

3.1 Introduction

Child abuse is any form of physical, emotional or sexual mistreatment or lack of care that leads to injury or harm; it commonly occurs within a relationship of trust or responsibility and is an abuse of power or a breach of trust. Abuse can happen to a young person regardless of their age, gender, race or ability.

There are four main types of abuse: **physical abuse, sexual abuse, emotional abuse, and neglect**. Any individual may abuse or neglect a young person directly, or may be responsible for abuse because they fail to protect the young person from harm or neglect.

Young people with disabilities may be at increased risk of abuse through various factors such as stereotyping, prejudice, discrimination, isolation and a powerlessness to protect themselves or adequately communicate that abuse had occurred.

3.2 Types of Abuse

(1) **Child abuse, exploitation, or neglect:** Constitutes any form of physical abuse; emotional ill-treatment; sexual abuse; neglect or insufficient supervision; trafficking; or commercial, transactional, labor, or other exploitation resulting in actual or potential harm to the child's health, well-being, survival, development, or dignity. It includes, but is not limited to: any act or failure to act which results in death, serious physical or emotional harm to a child, or an act or failure to act which presents an imminent risk of serious harm to a child.

(2) **Physical abuse:** Constitutes acts or failures to act resulting in injury (not necessarily visible), unnecessary or unjustified pain or suffering without causing injury, harm or risk of harm to a child's health or welfare, or death. Such acts may include, but are not limited to: punching, beating, kicking, biting, shaking, throwing, stabbing, choking, or hitting (regardless of object used), or burning. These acts are considered abuse regardless of whether they were intended to hurt the child.

(3) **Sexual Abuse:** Constitutes fondling a child's genitals, penetration, incest, rape, sodomy, indecent exposure, and exploitation through prostitution or the production of pornographic materials.

(4) **Emotional abuse or ill treatment:** Constitutes injury to the psychological capacity or emotional stability of the child caused by acts, threats of acts, or coercive tactics. Emotional abuse may include, but is not limited to: humiliation, control, isolation, withholding of information, or any other deliberate activity that makes the child feel diminished or embarrassed.

(5) **Exploitation:** Constitutes the abuse of a child where some form of remuneration is involved or whereby the perpetrators benefit in some manner.

3.3 Indicators of Abuse

Even for those experienced in working with child abuse, it is not always easy to recognize a situation where abuse may occur or has already taken place. Most people are not experts in such recognition, but indications that a child is being abused may many forms. For guidance see: <https://www.childwelfare.gov/pubpdfs/whatiscan.pdf>

4. Responding to Suspicions and Allegations

It is not the responsibility of anyone working at Creative Associates in a paid or unpaid capacity to decide whether or not child abuse has taken place. However, there is a responsibility to act on any concerns through contact with the appropriate authorities so that they can then make inquiries and take necessary action to protect the young person. This section explains how to respond to allegations/suspicions.

a. Recording Information

To ensure that information is as helpful as possible, a detailed record should always be made at the time of the disclosure/concern. In recording you should confine yourself to the facts and distinguish what is your personal knowledge and what others have told you. Do not include your own opinions.

b. Reporting the Concern

Any suspicions or allegation regarding the protection of children must immediately be reported to Creative's Fraud & Abuse direct lines: 1-877-750-CREA (2732) or +1-202-772-2137 or via email at: Fraud&Abuse@CreativeDC.com.

Once a suspicion or allegation is received, Creative's Security Department will conduct a preliminary review of the allegation and will guide the reporting process to the proper authorities.

Additionally, during an inquiry review, the following specific steps will be taken:

- The President and CEO and Executive Management will be notified.
- Legal Counsel, Compliance, HR, Field Administration and other Divisions/stakeholders will be consulted as appropriate.

The Security Department will oversee, guide and work with the field team to conduct any inquiry review, as appropriate.

c. Confidentiality

Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need to know basis only.
