

GLOBAL TOXICS RESEARCH INITIATIVE (GRIT)

Child Protection and Safeguarding Policy

Protecting children in research, fieldwork and programming

Policy owner	GRIT
Approved by	GRIT Board of Directors
Effective date	July 28 2026
Version	1.0
Applies to	All GRIT personnel, partners, sub-grantees, contractors and visitors, worldwide
Next review	July 2028 — reviewed at least every two years

1. Statement of Commitment

The Global Toxics Research Initiative (GRIT) works to understand and reduce children's exposure to toxic chemicals. Children are therefore both the primary beneficiaries of our work and, frequently, the direct subjects of our research and field activities. That proximity carries an absolute duty of care.

GRIT has zero tolerance for any form of child abuse, exploitation, neglect or harm caused, enabled or overlooked by anyone associated with our organization. We accept that safeguarding failures happen most often not through malice but through weak systems, unclear expectations and a reluctance to raise concerns. This policy exists to close those gaps.

The welfare of the child is the paramount consideration. Where a child's safety conflicts with the interests of a study, a partnership, a funder or GRIT's reputation, the child's safety prevails — without exception.

2. Purpose and Scope

This policy sets out the standards of behaviour GRIT requires, the safeguards built into our research and field operations, and the procedure for reporting and responding to a safeguarding concern.

It applies to:

- All GRIT directors, officers, employees, interns, volunteers, fellows and consultants (“Personnel”);
- All sub-grantees, field partners, implementing partners, laboratories, enumerators, drivers, translators, fixers, contractors and their staff (“Partners”);
- Researchers, students, journalists, photographers, donors and other visitors accompanying GRIT activities;
- All GRIT activities in every country, including household surveys, biological and environmental sampling, community meetings, school-based work, remote data collection and communications.

This policy applies to conduct both during and outside working hours, online and in person, where that conduct bears on a person's suitability to work with or near children.

It should be read alongside GRIT's Anti-Fraud, Anti-Corruption and Anti-Bribery Policy, Code of Conduct, Data Protection Policy, and research protocols approved by the relevant Institutional Review Board or Ethics Committee.

Where local law, an approved research protocol or a donor requirement sets a higher standard than this policy, the higher standard applies. This policy never justifies a lower one.

3. Definitions

Child. Any person under the age of 18, regardless of the age of majority, marriage, consent or employment in the country concerned.

Safeguarding. The responsibility to prevent our people, operations and programmes from causing harm to children and vulnerable adults, and to respond appropriately where harm occurs.

Child abuse. All forms of physical or emotional ill-treatment, sexual abuse, neglect, or commercial or other exploitation resulting in actual or potential harm to a child's health, survival, development or dignity.

The principal categories are:

- **Physical abuse** — deliberately causing physical harm, including hitting, shaking, or the use of corporal punishment in any setting.
- **Sexual abuse and exploitation** — any actual or attempted sexual activity with a child, and any abuse of a position of vulnerability, power or trust for sexual purposes. This includes online contact, sexualized language, exposure to sexual images, and the production, possession or sharing of child sexual abuse material. A child cannot consent to sexual activity with an adult; belief about the child's age is not a defence.
- **Emotional abuse** — persistent ill-treatment causing severe or lasting effects on a child's emotional development, including humiliation, threats, and exposure to frightening situations.
- **Neglect** — failure to meet a child's basic needs, or failure to protect a child from harm, including in situations where GRIT has assumed temporary responsibility for a child during an activity.
- **Exploitation** — use of a child for another's advantage, including child labour, trafficking, and the use of a child's image, story or data in a manner that damages their interests.

Research-related harm. Harm arising specifically from participation in research, including physical discomfort or injury from sampling procedures, psychological distress, breach of confidentiality, stigmatization of a child or household, and the failure to act on a finding that indicates a child is at risk.

Designated Safeguarding Lead (DSL). The senior GRIT staff member accountable for the operation of this policy and the first point of contact for concerns. GRIT's DSL is [Name, title, email, phone]. The Deputy DSL is [Name, title, contact].

4. Guiding Principles

1. The best interests of the child are the primary consideration in all decisions.
2. Every child has an equal right to protection, regardless of sex, age, disability, ethnicity, caste, religion, migration status, sexual orientation or gender identity.
3. Children have a right to be heard. Their views are sought and taken seriously in matters affecting them, in a manner appropriate to their age and maturity.
4. Prevention comes first: safe recruitment, clear conduct standards, training and well-designed protocols reduce risk far more reliably than after-the-fact response.
5. All concerns are taken seriously. It is not the reporter's job to determine whether abuse occurred.

6. Confidentiality is maintained on a need-to-know basis, and is never used to conceal harm to a child.
7. Do no harm: our response to a concern must not expose the child, the reporter or the community to further risk.

5. Code of Conduct

All Personnel, Partners and visitors must sign the acknowledgment at the end of this policy before taking part in any GRIT activity involving contact with children or communities.

You must	You must never
• Treat every child with respect and dignity, and use age-appropriate, non-discriminatory language. • Remain visible to others when with a child; work in pairs wherever practicable. • Obtain informed consent from a parent or guardian, and informed assent from the child, before any interaction, procedure or recording. • Explain to the child, in their own language, what will happen and that they may stop at any time. • Respect a child's refusal or withdrawal immediately and without pressure, even where the guardian has consented. • Challenge and report behaviour by colleagues or partners that breaches this Code. • Report any safeguarding concern promptly, including concerns about your own conduct being misperceived. • Comply with the approved research protocol, including limits on sample volume, procedure and repetition.	• Be alone with a child in a private, closed or unobserved setting. • Engage in any sexual activity with, or sexualized behaviour towards, a person under 18 — regardless of local age of consent or marital status. • Use physical punishment, restraint, humiliation, shouting, threats or degrading treatment. • Offer money, gifts, sweets, employment, favours or preferential treatment to a child or family in exchange for participation, information, images or anything else. • Transport a child in a vehicle alone, or take a child to your accommodation or hotel. • Develop a personal relationship with a child met through GRIT's work, or contact them privately by phone, messaging app or social media. • Photograph, film or record a child without documented consent, or share such material outside approved channels. • Perform any procedure on a child that is not specified in the approved protocol, or that you are not trained and authorized to perform.

Some contexts make strict compliance difficult — a household visit where no second adult is available, an unplanned request from a parent, a child who follows the team. Where you cannot comply, do not improvise: pause the activity, record what happened, and inform your team leader the same day.

6. Safeguarding in Research and Field Activities

GRIT's studies routinely involve children as participants, including biological sampling such as capillary or venous blood collection, and environmental sampling in homes and schools. The following requirements apply in addition to the approved research protocol.

6.1 Ethical approval and protocol discipline

8. No research involving children may begin without written approval from a recognized Institutional Review Board or national ethics committee, and any required national or sub-national research permissions.
9. Risk assessment must be completed and documented for every field site before deployment, and must explicitly address safeguarding risks, not only logistical and biosafety risks.

10. Any deviation from the approved protocol involving children must be reported to the DSL and the approving IRB.

6.2 Consent and assent

11. Written informed consent must be obtained from a parent or legal guardian, in the language they use, with an oral explanation where literacy is limited and an impartial witness where the consent is thumb-printed.
12. Assent must be sought separately from the child, in age-appropriate terms. A child's refusal ends the interaction, irrespective of guardian consent.
13. Consent must be free of inducement or coercion. Reimbursement for time and travel is permitted where approved by the IRB and set at a level that does not distort the decision to participate.
14. Consent is not a one-off event: it must be reconfirmed at each visit and before each distinct procedure.

6.3 Sampling procedures involving children

15. Blood or other biological samples may be collected from a child only by a person qualified and licensed to do so under local law, using the technique, volume and site specified in the protocol.
16. A parent, guardian or trusted adult must be present throughout, unless the child specifically objects to that person's presence and an alternative safeguard is arranged.
17. Procedures must be stopped if the child becomes distressed. Repeat attempts are limited to the number specified in the protocol.
18. Personnel conducting sampling must be trained in infection control, safe sharps handling and the management of adverse reactions, and must carry the means to respond to a fainting or bleeding episode.

6.4 Results, incidental findings and referral

Identifying that a child is being harmed by toxic exposure and then failing to act on it is itself a safeguarding failure. GRIT will not collect data on children's exposure without a plan for what happens when that data shows harm.

19. Every study protocol involving children must define, in advance: the threshold at which an individual result triggers action; who communicates the result and how; and the specific clinical, public health or social service to which the child will be referred.
20. Individual results must be returned to the parent or guardian in an understandable form, with clear guidance on next steps, unless the IRB has approved a documented alternative.
21. Where a result indicates an urgent risk to a child's health, referral must be initiated immediately and not held pending study completion, publication or funder approval.
22. Where fieldwork reveals a child at risk from any other cause — violence, neglect, exploitation, hazardous child labour at a recycling or smelting site — the reporting procedure in Section 9 applies in full.
23. Where no adequate referral service exists locally, this must be identified at protocol design stage and addressed before the study proceeds, not afterwards.

6.5 Sites involving hazardous child labour

GRIT's work may bring teams into contact with informal recycling, smelting, mining or waste sites where children are present and working. Personnel must not employ, task, direct or reward a child for any activity at such a site, must not offer payment for access facilitated by a child, and must record and report the presence of working children to the DSL as a safeguarding concern under Section 9.

7. Images, Communications and Data

24. Photographs, video or audio of a child require documented consent from the guardian and assent from the child, obtained specifically for the intended use and explained in plain language, including that images may appear online and cannot be fully retracted.
25. Children must be depicted with dignity: appropriately dressed, not in poses or framing that could be interpreted as sexualized, and not presented solely as passive victims.
26. Do not publish a child's full name, school, clinic, exact address, GPS coordinates or other identifying detail alongside their image or health data.
27. Images and recordings of children must be stored on GRIT-controlled encrypted systems, never on personal phones, personal cloud accounts or personal social media. Delete field-device copies once transferred.
28. Personal and health data on children must be pseudonymized at the earliest practicable point, with the linkage key held separately and access restricted to named individuals.
29. Consent may be withdrawn at any time, and GRIT will cease further use of the image or data on request.

8. Safer Recruitment, Training and Partners

8.2 Training

30. All Personnel receive safeguarding induction before their first field deployment or contact with children.
31. Refresher training is completed at least annually, and a site-specific safeguarding briefing is delivered to every team, including drivers, translators and locally engaged enumerators, before each field campaign.
32. Visitors joining a field activity receive a briefing and sign the acknowledgment before participating.

8.3 Partners and sub-grantees

33. Partners must have an equivalent safeguarding policy and reporting mechanism, or formally adopt GRIT's, before an agreement is signed.
34. Safeguarding capacity is assessed during partner due diligence, proportionate to the partner's level of contact with children.
35. All agreements include safeguarding obligations, a duty to report incidents to GRIT within [24] hours, audit and inspection rights, flow-down to sub-contractors, and a right to suspend or terminate for breach.

9. Reporting a Concern

Every person covered by this policy has a duty to report. You must report any concern, suspicion, disclosure or allegation of harm to a child — whether it concerns GRIT personnel, a partner, a family member, or anyone else, and whether or not it arises from GRIT's work.

Report immediately, and in any event within 24 hours. You do not need proof, and it is not your role to investigate, question the child further, or decide whether the concern is well founded.

9.1 If a child discloses to you

- Listen calmly and without expressing shock, judgement or disbelief.
- Do not ask leading or probing questions; let the child use their own words.
- Do not promise confidentiality. Explain gently that you have to tell someone whose job it is to help keep them safe.
- Reassure the child that they were right to tell you and that it is not their fault.
- Record what was said as soon as possible, in the child's own words, with date, time, place and who was present. Do not add interpretation.
- Pass the record only to the DSL, by a secure channel.

9.2 How to report

Concerns should be reported to the Designated Safeguarding Lead:

Designated Safeguarding Lead	[Name] — [email] — [phone, including out-of-hours]
Deputy DSL	[Name] — [email] — [phone]
Board Safeguarding Focal Point	[Name] — [email] — for concerns involving the DSL or Executive Director
Confidential / anonymous channel	[hotline, secure web form, or dedicated inbox]

Reports may be made anonymously. Children, families, community members and partner staff may also use these channels; GRIT will publicize them at field sites in the local language and in a form accessible to children.

If a child is in immediate danger, contact local emergency, police or child protection services first, then notify the DSL.

9.3 Protection for those who report

GRIT will not tolerate retaliation of any kind against anyone who raises a concern in good faith or cooperates with an investigation, including where the concern turns out to be mistaken. Retaliation is itself a serious disciplinary offense. Knowingly making a false or malicious allegation is also a disciplinary offence.

Failure to report a known or suspected safeguarding concern is a breach of this policy and may itself result in disciplinary action.

10. Responding to a Concern

36. On receiving a report, the DSL immediately assesses whether the child is safe and arranges emergency medical, protective or psychosocial support as needed.

37. The DSL determines mandatory reporting obligations under local law and, where applicable, notifies police, child protection authorities or other statutory bodies. Where local authorities cannot be trusted to act in the child's interest, the DSL takes advice from [named external safeguarding adviser or legal counsel] before proceeding, and documents the reasoning.
38. Where the concern involves Personnel or Partner staff, the individual will normally be suspended from all activity involving children pending the outcome. Suspension is a neutral protective measure, not a finding.
39. Investigations are conducted promptly, fairly and by a person independent of the matter, using external investigators where the seriousness, seniority or conflict of interest requires it. Investigation of a criminal allegation is for the authorities; GRIT will not conduct a parallel process that could prejudice it.
40. Support for the child and family — medical, legal, psychosocial — is arranged irrespective of the investigation's outcome and is not contingent on the child's cooperation.
41. Substantiated breaches result in disciplinary action up to and including dismissal, termination of partner agreements, referral to law enforcement, and notification to relevant regulators and donors within the deadlines in our grant agreements.
42. All reports, decisions and outcomes are recorded in a confidential safeguarding register held securely by the DSL and retained in line with GRIT's Data Protection Policy.
43. The DSL reports anonymized case numbers, themes and lessons learned to the Board at least [semi-annually]. Every case is reviewed for what it reveals about GRIT's systems, not only about the individuals involved.

11. Roles and Responsibilities

- **The Board** — owns this policy, approves it annually, appoints the Board Safeguarding Focal Point, receives incident reporting, and ensures safeguarding is adequately resourced.
- **The Executive Director** — is accountable for implementation and for maintaining a culture in which concerns are raised and acted on.
- **The Designated Safeguarding Lead** — is the operational owner: receives and assesses reports, coordinates response and referral, maintains the register, oversees training and partner assessment, and advises on protocol design.
- **Principal Investigators and study leads** — ensure each protocol embeds consent, assent, referral pathways and result-return before submission for ethical approval.
- **Field team leaders** — deliver the site briefing, enforce the Code of Conduct daily, and escalate concerns the same day.
- **All Personnel, Partners and visitors** — comply with this policy, complete required training, and report concerns.

12. Monitoring and Review

This policy will be reviewed at least annually by the DSL and approved by the Board, and additionally after any serious incident, significant change in GRIT's activities, or change in applicable law or donor

requirements. Review will draw on the safeguarding register, training records, partner assessments and feedback from communities and children where it is safe and appropriate to seek it.

13. Acknowledgment and Undertaking

To be signed before any GRIT activity involving contact with children or communities.

I confirm that I have read and understood the GRIT Child Protection and Safeguarding Policy. I agree to abide by its Code of Conduct, to report any safeguarding concern immediately through the channels set out in Section 9, and to cooperate fully with any resulting process.

I confirm that I have never been the subject of a substantiated allegation, criminal conviction, dismissal or ongoing investigation relating to harm to a child, and I undertake to notify the Designated Safeguarding Lead immediately should any such matter arise.

Name: _____ Role: _____

Organization: _____ Date: _____

Signature: _____