

Policy name: Safeguarding Policy	
Policy owner: Senior Director Risk Management and Compliance	Effective: 15 November 2018
Version: 1.2	Last Reviewed: 21 January 2021

Audience: All Food for the Hungry (FH) employees, partners, representatives, board members, consultants, volunteers, and anyone else (“personnel”) associated with the delivery of FH work. This policy applies to personnel at all times, including when they are on duty, off duty, or on leave.

Purpose:

Food for the Hungry (FH) believes all people are made in the image of God and should be treated with respect, honored for their intrinsic value, and cared for in ways that glorify God.

The purpose of this policy is to protect all program participants and community members, including children and all vulnerable populations, from any harm that may be caused due to their involvement with FH programs. This includes harm caused by:

- The conduct of personnel associated with FH.
- The design and implementation of FH's programs and activities.

FH strives to provide an environment free of sexual exploitation, abuse and harassment (SEAH) in all places where relief and development programs are implemented. FH holds a zero-tolerance policy against sexual exploitation, abuse and harassment between personnel and program participants and community members.

This policy affirms the commitments made by FH and informs personnel of responsibilities in relation to safeguarding.

Key Terms:

- a. Safeguarding
 - i. The process of protecting program participants and community members, including children and vulnerable populations, from abuse, abuse of power/ authority, neglect, sexual exploitation, sexual harassment, bullying and shaming to prevent impairment of their health and development. This ensures they are safe and have effective care that enables them to flourish.
 - ii. FH is responsible to ensure that personnel, operations, and programs do no harm. This includes protecting children and vulnerable populations from the risk of harm and abuse.

b. Child(ren)

A child is an individual under the age of 18, irrespective of local or cultural definitions of when a child reaches adulthood.

c. Child Abuse

The infliction of physical or emotional injury on a person under the age of 18 years old. There are four categories of child abuse:

- i. Sexual Abuse: Includes any actual or threatened sexual contact, prostitution, or pornography involving a child. A child is incapable of “consenting” to sexual activity with an adult. The mistaken belief that the person is 18 or older cannot be used as a defense.
- ii. Physical Abuse: Includes the actual or threatened physical injury of a child. Child physical abuse can include deliberately hitting, beating, shaking, and/or throwing a child.
- iii. Emotional Abuse: Includes severe or persistent mistreatment, or rejection of a child that may impair emotional or behavioral development. Emotional abuse can include telling the child they are worthless, unloved, or inadequate; inappropriate use of spiritual authority (for example, the Bible, church tradition, church authority, etc.); or forcing a child to act in any unhealthy way.
- iv. Neglect: Includes the persistent or severe failure to care for and/or protect a child from exposure to danger that results in the impairment of health or development. Neglect can include educational, physical or emotional elements.

d. Program participant

A resident of a community where FH partners who is recipient of services, and/or participate actively as a contributor of project service activities sponsored by FH and FH partners.

e. Vulnerable populations

Adults and children who are unable to protect themselves from harm, exploitation or harassment for any reason including gender, mental health, physical health, disability, ethnicity, religious identity, economic, social status, and/or as a result of disasters and conflicts, are deemed to be at risk.

f. Sexual exploitation

Sexual exploitation occurs when someone uses, or tries to use, a differential power relationship or another person's vulnerable position or trust for sexual purposes. This can include coercing or engaging a person into a sexual act, prostitution, or pornography, with or without the person's consent, in exchange for goods and services, money, drugs, shelter, food, protection, or other

benefits.¹

g. Sexual abuse

Actual or threatened physical sexual contact, whether by force or under unequal or coercive conditions. Program participants or other community members may be at particular risk of sexual exploitation or abuse.

h. Sexual harassment

Any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment.²

Policy:

Safeguarding

All people have the right to protection from harm, abuse, neglect, sexual harassment, sexual exploitation, and abuse. FH will not tolerate harm, abuse, neglect, sexual harassment, sexual exploitation by personnel.

FH commits to instituting safeguarding measures through prevention, reporting, and response.

FH will:

- Ensure all personnel have access to, are familiar with, and know their responsibilities in relation to this policy.
- Design and implement all its programs and activities in ways that protect people from risk of harm arising from contact with FH. This includes how personal information about program participants is collected and shared.
- Implement stringent safeguarding procedures when recruiting, deploying, and managing personnel.
- Ensure personnel receive annual training on safeguarding, to be completed in quarter two of the fiscal year, including reporting obligations and procedures.
- Investigate and respond to reports of safeguarding concerns promptly and according to set standards.
- Maintain documentation of allegations, investigations, and responses in a secure location.

¹ UN Secretary General's Bulletin: Special measures for protection from sexual exploitation and sexual abuse. 9 October 2003. <https://undocs.org/ST/SGB/2003/13>

² UN Secretary General's Bulletin: Prohibition of discrimination, harassment, including sexual harassment, and abuse of authority. 11 February 2008. <https://undocs.org/en/ST/SGB/2008/5>

Prohibited activities

When interacting with program participants, community members, children and vulnerable populations where FH partners, personnel are prohibited from engaging in any of the following actions (this list is not all inclusive):

A. Sexual Misconduct

- a. Spending time with a child where they are outside the view of others. Use the “different gender two adult” rule when possible.
- b. Behaving with program participants, community members, children and vulnerable populations, in a manner that is sexually provocative, including verbal or physical conduct or gestures of a sexual nature.
- c. Exposing program participants, community members, children and vulnerable populations, to pornography or other sexually explicit images or media.
- d. Sleeping in the same bed with a child (that is not your own) or vulnerable individuals.
- e. Suggesting that an alleged survivor of sexual abuse has any responsibility for the abuse or that the he or she behaved in a “seductive” manner.
- f. Unwanted touch, molesting, oral sex and/or sexual intercourse with any program participant, community members, children and vulnerable populations.
- g. Engaging in prostitution.
- h. Facilitating any such act with program participants and community members, including children or vulnerable populations.

B. Physical Misconduct

- a. Hitting or physically assaulting program participants, community members, children and vulnerable populations, even if acceptable in local culture.

C. Emotional Misconduct

- a. Acting in ways that shame, humiliate, belittle, or degrade program participants, community members, children and vulnerable populations, or otherwise perpetrate any form of abuse.
- b. Participating in harmful traditional practices or spiritual or ritualistic abuse.

D. Inappropriate Images

- a. Taking, producing, or creating images of program participants, community members, children and vulnerable populations that are humiliating, degrading, shameful or otherwise offensive. All program participants, community members, children and vulnerable populations should be adequately clothed and not in poses that could be perceived as sexually suggestive.

E. Other

- a. Enlisting or engaging a child or vulnerable populations in FH activities without parental or guardian consent.

- b. Driving a child without parental consent or vulnerable individuals without proper consent; at least one other adult must be present in the car or on a motorcycle.
- c. Including the full name or location of the program participant, community member, child or vulnerable individual in media publications or to unauthorized people.
- d. Taking program participants, community members, children and vulnerable populations to the home of personnel.
- e. Being intoxicated or consuming alcohol or drugs before or during encounters with program participants, community members, children and vulnerable populations.
- f. Using offensive language, suggestions, or advice.
- g. Exposing program participants, community members, children and vulnerable populations to situations that are unsafe, abusive, or illegal.
- h. Dressing in a culturally inappropriate way where bodies are exposed to program participants, community members, children and vulnerable populations.
- i. Blaming the survivor for abuse, as they cannot be blamed for the actions of others.
- j. Leaving non-FH personnel unsupervised during visits to FH project areas.
- k. Hiring vulnerable populations to do any work that exploits them.

Prevention of Sexual Exploitation, Abuse and Harassment

In order to protect children and the most vulnerable populations from sexual exploitation, abuse and harassment (SEAH), and to ensure the integrity of FH activities, the following core principles must be followed:

- A. SEAH constitutes acts of gross misconduct and are grounds for termination of employment.
- B. Sexual activity with children is prohibited. The mistaken belief that the person is 18 or older cannot be used as a defense.
- C. Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliation, degrading or exploitative behavior, is prohibited. This includes the exchange of assistance that is due to program participants.
- D. Sexual relationships between personnel and program participants, community members, children and vulnerable populations is not allowed. Such relationships, as they are based on inherently unequal power dynamics, undermine the credibility and integrity of FH's relief and development work.

- E. When personnel develop concerns or suspicions regarding SEAH by a fellow worker, whether in FH or not, he or she must immediately report such concerns via established reporting mechanisms.³
- F. When personnel develop concerns or suspicions regarding SEAH between program participants and/or community members, he or she must immediately report such concerns via established reporting mechanisms.
- G. Personnel are required to create and maintain a safe environment that prevents SEAH and promotes the implementation of this policy. Supervisors at all levels have responsibilities to support and reinforce systems which maintain this environment.

Commitments⁴

FH is dedicated to fulfilling the Inter-Agency Standing Committee (IASC)'s Six Core Principles through implementation of the following commitments.⁵ FH will:

- A. Develop organization-specific strategies to prevent and respond to SEAH. This includes incorporating appropriate job responsibilities in specific personnel positions, undertaking assessments to identify areas of risks, and document steps taken to mitigate these risks.
- B. Incorporate FH's standards on SEAH in relevant documentation and materials, including but not limited to, codes of conduct, onboarding materials, training courses for personnel, and legal employment agreements and documentation.
- C. Ensure that when engaging in partnerships, sub-grant or sub-recipient agreements, partnership agreement documents must,
 - a) include this Policy as an attachment;
 - b) incorporate appropriate language requiring contracting entities and individuals, their employees, and volunteers to abide with a code of conduct aligned with this Policy; and
 - c) expressly state that failure to take preventive measures against SEAH, to investigate and report allegations, or to take corrective actions when SEAH has occurred, shall constitute grounds for FH to terminate the agreement and partnership.
- D. Regularly inform personnel, non-personnel, program participants, community members, children and vulnerable populations on measures taken to prevent

³ The established complaints mechanism may at times be an independent, third-party reporting mechanism. However, FH is committed to participating in inter-agency community based complaints mechanisms in humanitarian contexts, and therefore inter-agency complaints mechanisms may be the established system in some contexts.

⁴ The Commitments are based on the Inter-Agency Standing Committee (IASC)'s Statement of Commitment Relating to Sexual Exploitation and Abuse by UN and non-UN personnel and the Six Core Principles, 23 September 2019. https://interagencystandingcommittee.org/system/files/iasc_six_core_principles_relating_to_sexual_exploitation_and_abuse_sept_2019.pdf

⁵ The IASC is a unique inter-agency forum for coordination, policy development and decision-making involving the key UN and non-UN humanitarian partners. The Six Core Principles are a set of standards to protect affected populations from sexual exploitation and abuse within humanitarian and development response operations. 23 September 2019. https://interagencystandingcommittee.org/system/files/iasc_six_core_principles_relating_to_sexual_exploitation_and_abuse_sept_2019.pdf

and respond to SEAH, including complaint mechanisms. Confidentiality will be respected for all parties involved.

- E. Engage the support of communities and governments to prevent and respond to SEAH by personnel and non-personnel.
- F. Ensure that reporting mechanisms are accessible and that FH focal points understand how to respond appropriately, including a reporting procedure in a relevant local language and policy for non-compliance.
- G. Provide support and assistance to SEAH survivors. This may include medical treatment, legal assistance, and psychosocial support as appropriate, taking into account confidentiality, cultural sensitivities, and survivor safety.
- H. In compliance with applicable laws, prevent perpetrators of SEAH from being (re)hired or (re)deployed. Managers and Human Resource teams must ensure robust recruitment screening processes for all personnel. Investigate allegations of SEAH in a timely and professional manner.
- I. Take swift and appropriate action, including legal action when required, against personnel and non-personnel who commit SEAH. This includes termination, and referral to the relevant authorities for appropriate action in the abuser's country of origin as well as the host country.
- J. Take appropriate actions to the best of FH's abilities to protect reporters from retaliation where allegations of SEAH are reported involving personnel and non-personnel.
- K. Ensure high-level oversight on SEA reports received and actions taken, in order to monitor effectiveness, report progress, and improve efforts to prevent and respond to SEAH.
- L. Personnel will treat all people with respect and not use language or behavior towards program participants, community members, children and/or vulnerable populations that are inappropriate, harassing, abusive, sexually provocative, demeaning, or culturally inappropriate.
- M. When photographing or filming program participants, community members, children and vulnerable populations, personnel will:
 - a. Comply with local traditions or restrictions for reproducing personal images;
 - b. Obtain written, informed consent from the parent or guardian, before photographing or filming a program participant, community member, child or vulnerable individual, explaining how the photograph or film will be used. If the parent or guardian is illiterate, verbal explanation of guidelines for consent must be given in the local language, asking for thumb print or other marking to indicate consent on the form;
 - c. Ensure photographs, videos, social media, and digital technology present program participants, community members, children and vulnerable populations in a dignified and respectful manner;

- d. Ensure program participants, community members, children and vulnerable populations are adequately clothed and not in poses that could be seen as sexually suggestive;
- e. Ensure images are honest representations of the context and the facts, and;
- f. Ensure file labels do not reveal identifying information about a program participant, community member, child or vulnerable individual including full name, city, and/or country.
- g. Ensure images, video, social media content or digital content of any kind is not used or kept by personnel for personal use.

Duty to Report

- A. Personnel are required to immediately report (within 24 hours), verbally or in writing, any suspicion, or allegation of a policy violation.
- B. Reporting options:
 - a. Confidential, anonymous reporting: <https://fh.ethicspoint.com>
 - b. The confidential reporting mechanism available in their location
 - c. Their supervisor (who must then forward the complaint, allegation or suspicion to the reporting site at: <https://fh.ethicspoint.com> immediately (within 24 hours of receipt of complaint).
- C. If personnel learn of potential safeguarding issues, he/she must report even if the alleged survivor does not want it investigated. While FH will strive to respect the alleged survivor's wishes, in some situations FH may need to investigate to ensure protection and prevention of future mistreatment. Also, in some situations, FH may be required to report the potential misconduct to local authorities for investigation.
- D. Personnel must report suspected or alleged safeguarding issues, even if the issues are between program participants or community members. If the alleged perpetrator is not personnel, FH will refer the matter to appropriate authorities.
- E. Personnel are not to follow-up or investigate suspected or alleged safeguarding issues on their own.
- F. Failure to report safeguarding issues can result in criminal liability and/or termination.

Retaliation

FH prohibits retaliation against anyone who:

- Opposes any act of abuse;
- Reports in good faith any suspected or alleged child and vulnerable populations; and
- Participates in the investigation of any alleged incident of child and vulnerable populations.

Retaliation is grounds for discipline of personnel, including termination. Anyone who believes that he/she has been retaliated against should promptly inform FH using the reporting options listed previously.