



Policy Title: Safeguarding Policy	
Policy owner: Risk and Assurance Executive Sponsor: VP of Risk and Assurance	Effective Date: October 1, 2023 Next Review Date: October 1, 2025
Revision: 1.3	Document Type: Global Policy

Reason for Policy

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. This aligns with our Heartbeat culture, mindsets and behaviors.

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, harassment, bullying, shaming, or any form of harm in all areas where FH operates. FH holds a zero-tolerance policy against all forms of physical and sexual abuse among personnel and between personnel and program participants and/or community members.

This policy affirms the above commitments made by FH, the principles upon which we will base our decision making and action, and informs personnel of responsibilities in relation to safeguarding.

Scope

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.

Policy Statement

Safeguarding

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

sexual exploitation by personnel. We recognize that there are unequal power dynamics across the organization and in relation to those we serve, and that we face the risk of some people exploiting their position of power for personal gain.

FH commits to instituting safeguarding measures through supporting survivors, improving safeguarding capacity, reporting, investigating, responding to, and preventing any safeguarding misconduct.

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 principles, ethics, and appropriate behavior to be completed in quarter two of the fiscal year, including reporting obligations and procedures. As part of their responsibilities for creating and maintaining a safeguarding environment, supervisors are responsible for ensuring that the employees reporting to them complete all required training.
- 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.
- See Appendix for prohibited activities, core principles and commitments related to this policy

Duty to Report

- Personnel are required to immediately report (within 24 hours), verbally or in writing, any suspicion, or allegation of a policy violation.
- See Appendix for Reporting Options

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.

Responsibilities

- Chief Financial Officer (CFO) and Risk and Assurance unit are responsible for:
 - Ensuring this policy and related guidance and training materials remain up-to-date via annual reviews;
 - Ensuring global reporting and investigations are overseen in accordance with this Policy and the Whistleblower Policy and related guidance; and
 - Reporting to the Board Finance and Enterprise Risk Management (FERM) Committee regarding allegations.
- The Chief Talent and Culture Officer (CTCO) and Human Resources Team are responsible for:
 - Ensuring that safe recruiting processes are in place and adhered to;
 - Ensuring that all team members undergo the compliance training annually and acknowledge their understanding of it and willingness to abide by it;
 - Working closely with senior management in all countries to ensure that focal points are properly identified and trained and policies and trainings are appropriately adapted to the local context; and
 - Ensuring that team members declared ineligible for rehire are not rehired by FH and that this status is included in responses to employment verification checks by other organizations.
- The Chief Operating Officer (COO) and Program Delivery team is responsible for:
 - Providing minimum standards and guidance to country teams related to community accountability reporting mechanisms for program participants and community members.
- All FH leadership, country directors and senior leadership teams in all countries and areas where FH operates are responsible for:
 - Creating and maintaining an environment and culture that fosters respect and inclusion and does not tolerate any harm;
 - Overseeing the full implementation of this Policy in their area of operations;
 - Ensuring that all safeguarding complaints are taken seriously and immediately reported to EthicsPoint, are treated with confidentiality, and given high priority;
 - Ensuring that survivors are offered psychosocial, medical, legal, and other support as necessary; and
 - Ensuring that anyone who reports complaints or participates in investigations are not retaliated against.

Enforcement

Failure to follow this policy or retaliation against those who report in good faith is grounds for discipline of personnel, including termination.

Approval



September 27, 2023 | 3:26 PM EDT

Mark Viso, President and CEO

Date

Related Resources

- [Whistleblower Guidelines](#)
- [Safeguarding Acknowledgement Form](#)
- [Code of Conduct](#)
- [Whistleblower Policy](#)
- [Anti-Harassment and Nondiscrimination Policy](#)
- [Diversity, Equity, and Inclusion \(DEI\) Policy](#)
- [Business Integrity Policy](#)
- [Community System for Accountability and Feedback \(C-SAFE\) Policy](#)
- [Enterprise Risk Management \(ERM\) Policy](#)
- [UN Secretary General's Bulletin: Special measures for protection from sexual exploitation and sexual abuse](#)
- [UN Secretary General's Bulletin: Prohibition of discrimination, harassment, including sexual harassment, and abuse of authority](#)
- [Inter-Agency Standing Committee \(IASC\) Six Core Principles Related to Sexual Exploitation and Abuse](#)
- [International Labor Organization \(ILO\) Convention 182](#)
- [International Labor Organization \(ILO\) Convention 138](#)
- [Inter-Agency Misconduct Disclosure Scheme \(MDS\)](#)
- [Inter-Agency Standing Committee \(IASC\) Definition & Principles of a Victim Survivor Centered Approach](#)
- [InterAction CEO Pledge on Preventing Sexual Abuse, Exploitation, and Harassment by and of NGO Staff](#)
- [InterAction Core Standards for Survivor-Centered Support of Sexual Exploitation, Abuse, and Harassment](#)

Related Trainings

- [All-Staff Safeguarding Awareness Training](#)

Related Tools

- [Whistleblower Guidelines](#)
- [Community System for Accountability and Feedback \(C-SAFE\) Toolkit](#)
- [Internal Investigations Toolkit & Case Management Guidelines](#)
- [Enterprise Risk Management Guidelines](#)

Related Websites

- [United Nations](#)
- [Inter Agency Standing Committee \(IASC\)](#)
- [InterAction](#)
- [FH Connect - Safeguarding page](#)
- [FH Connect - C-SAFE page](#)
- [FH Connect - Risk Management and Assurance page](#)

Revision History

Revision	Effective Date	Description of Change
1.3	October 1, 2023	Update for current standards and format

Appendix

Definitions

Term	Definition
Safeguarding	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.

	<p>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, as well as minimizing negative impacts on communities, the environment, and cultural heritage.</p>
<p>Child(ren)</p>	<p>A child is an individual under the age of 18 years old, irrespective of local or cultural definitions of when a child reaches adulthood.</p>
<p>Child Abuse</p>	<p>The infliction of physical or emotional injury on a person under the age of 18 years old. There are four categories of child abuse:</p> <ul style="list-style-type: none"> 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.
Program participant	A resident of a community where FH partners who is a recipient of services, and/or participate actively as a contributor of project service activities sponsored by FH and FH partners.
Vulnerable populations	Adults and children who are unable to protect themselves from harm, exploitation, and 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.
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.
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.
Sexual harassment	Any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offense 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.

Bullying	Prone to or characterized by overbearing mistreatment and domination of others.
Shaming	The act or activity of subjecting someone to shame, disgrace, humiliation, or disrepute especially by public exposure or criticism.

Guidelines

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):

- **Sexual Misconduct**
 - Spending time with a child where they are outside the view of others. Use the “different gender two adult” rule when possible.
 - 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.
 - Exposing program participants, community members, children and vulnerable populations, to pornography or other sexually explicit images or media.
 - Sleeping in the same bed with a child (that is not your own) or vulnerable individuals.
 - 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.
 - Unwanted touch, molesting, oral sex and/or sexual intercourse with any program participant, community members, children and vulnerable populations.
 - Engaging in prostitution.
 - Facilitating any such act with program participants and community members, including children or vulnerable populations.
- **Physical Misconduct**
 - Hitting or physically assaulting program participants, community members, children and vulnerable populations, even if acceptable in local culture.
- **Emotional Misconduct**
 - Acting in ways that shame, humiliate, belittle, or degrade program participants, community members, children and vulnerable populations, or otherwise perpetrate any form of abuse.
 - Participating in harmful traditional practices or spiritual or ritualistic abuse.

- Inappropriate Images
 - 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.
- Other
 - Enlisting or engaging a child or vulnerable populations in FH activities without parental or guardian consent.
 - 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.
 - Including the full name or location of the program participant, community member, child or vulnerable individual in media publications or to unauthorized people.
 - Taking program participants, community members, children and vulnerable populations to the home of personnel.
 - Being intoxicated or consuming alcohol or drugs before or during encounters with program participants, community members, children and vulnerable populations.
 - Using offensive language, suggestions, or advice.
 - Exposing program participants, community members, children and vulnerable populations to situations that are unsafe, abusive, or illegal.
 - Dressing in a culturally inappropriate way where bodies are exposed to program participants, community members, children and vulnerable populations.
 - Blaming the survivor for abuse, as they cannot be blamed for the actions of others.
 - Leaving non-FH personnel unsupervised during visits to FH project areas.
 - Hiring vulnerable populations to do any work that exploits them.
 - Hiring children in any form of child labor (including as “house help”) unless it is within the best interest of the child and in alignment with local law and international standards. ‘Child labor’ is work that is mentally, physically, socially or morally dangerous and harmful to children, or that interferes with their schooling and puts them at significant risk of injury. ‘Child work’ may be beneficial if it meets, and is in alignment with International Labor

Organization (ILO) Conventions and puts the child's interests ahead of any benefits gained by adults.

Core Principles

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:

- SEAH constitutes acts of gross misconduct and are grounds for termination of employment.
- Sexual activity with children is prohibited. The mistaken belief that the person is 18 or older cannot be used as a defense.
- 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.
- 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.
- 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.¹
- 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.
- 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.

Commitments

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

¹ 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, and therefore inter-agency complaints mechanisms may be the established system in some contexts.

- 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. This is in alignment with and central to the FH Compliance Program, which is applicable to all personnel.
- 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.
- Ensure that when engaging in partnerships, sub-grant or subrecipient 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.
- Report obligations to donors (private individuals and government agencies) about how it is implementing safeguarding.
- Regularly inform personnel, non-personnel, program participants, community members, children and vulnerable populations on measures taken to prevent and respond to SEAH, including complaint mechanisms. Confidentiality will be respected for all parties involved.
- Engage the support of communities and governments to prevent and respond to SEAH by personnel and non-personnel.
- Ensure that reporting mechanisms are accessible and that FH safeguarding focal points understand how to respond appropriately, including a reporting procedure in a relevant local language and policy for non-compliance.
- Provide support and assistance to SEAH survivors as appropriate depending on the nature of the complaint, the circumstances involved, and the informed consent of the survivor. This may include medical treatment, legal assistance, and psychosocial support as appropriate, taking into account confidentiality, cultural sensitivities, and survivor safety. FH will assist them with reporting incidents to the proper authorities should they choose to do so directly.
- 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, including screening

using the Inter-Agency Misconduct Disclosure Scheme (MDS). Investigate allegations of SEAH in a timely and professional manner.

- 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.
- 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.
- Ensure high-level oversight on SEAH reports received and actions taken, in order to monitor effectiveness, report progress, and improve efforts to prevent and respond to SEAH.
- 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.
- When photographing or filming program participants, community members, children and vulnerable populations, personnel will:
 - Comply with local traditions or restrictions for reproducing personal images;
 - 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;
 - Ensure photographs, videos, social media, and digital technology present program participants, community members, children and vulnerable populations in a dignified and respectful manner;
 - Ensure program participants, community members, children and vulnerable populations are adequately clothed and not in poses that could be seen as sexually suggestive;
 - Ensure images are honest representations of the context and the facts, and;
 - 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.
 - Ensure images, video, social media content or digital content of any kind is not used or kept by personnel for personal use.

Reporting Options

- Confidential, anonymous reporting: <https://fh.ethicspoint.com>
- The confidential reporting mechanism available in their location
- 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).
- 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.
- 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.
- In the event that personnel wish to report a safeguarding complaint against an FH executive team member, the complaint may be made either to the CEO (unless the complaint involves the CEO) or directly to FH's Board Chair (. Allegations against executive team members will be investigated by external experts.
- Personnel are not to follow-up or investigate suspected or alleged safeguarding issues on their own.
- Failure to report safeguarding issues can result in criminal liability and/or termination.