SPEAK UP! TAKE ACTION AGAINST ABUSE!

Humanity & Inclusion (HI) has a zero tolerance stance on sexual exploitation, abuse, harassment and bullying.

If you are a victim or witness of a situation of abuse committed by any HI staff or any HI partners, you can report it through our dedicated mechanisms:
- **EthicsPoint platform via HInside (https://hinside.hi.org/intranet/jcms/) or hi.org (https://hi.org/en/reporting-form)**
- **Contact any manager, Focal Point or the HQ referents (contacts in annex 3)**

Direct Manager (field of HQ)	Verbal or by email
Senior manager (fied or HQ)	Program Director, National Association Director, Geographical Directors
Safeguarding Advisor: Mrs Lucile Papon	l.papon@hi.org
Fraud and Corruption Referent: Mr Luciano Loiacono	l.loiacono@hi.org
Director of Risk and Audit: Mrs Emmanuelle Weber	e.weber@hi.org
Director of Human Resources: Mrs Céline Blay	c.blay@hi.org
General Director: Mr Manuel Patrouillard	m.patrouillard@hi.org
Ethics Point Platform	HInside (https://hinside.hi.org/intranet/jcms/) or hi.org (https://hi.org/en/reporting-form)

S a f e g u a r d i n g F r a m e w o r k
A SAFE ENVIRONMENT FOR ALL

BE SKILLED

Read the Child Protection, PSEAH, Anti-fraud & bribery and Disability, Gender and Age policies!

Follow the e-learning trainings from the Safeguarding Learning Package!
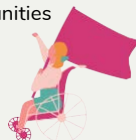
RESPECT THE CODE

Read, sign and follow the Code of Conduct to behave appropriately when working with HI

ACCESS

Make sure to establish a range of participative feedback and complaint mechanisms accessible to all members of your host's communities

PREVENT

Prevent future harm with Safe recruitment, HR processes and risk analysis tools to be used by HI and its partners

A SET OF ORGANISATIONAL POLICIES, PROCEDURES AND PRACTICES DESIGNED TO ENSURE THAT NO HARM COMES TO PEOPLE AS RESULT OF CONTACT WITH HI'S PROGRAMMES, OPERATIONS OR PEOPLE.

humanity
&inclusion

REPORT

RESPOND

YOU HAVE TO REPORT

An Internal Alert System via your managers or HInside

An external Mechanism for the beneficiairies

All is received on Ethics Point - a secured and confidential platform

Keep these in mind:

A Zero Tolerance for abuses with an incident management process including professional investigations, reporting and transparent decisons

PRESERVE & PROTECT

Keep a victim – centered approach ensuring care, confidentiality, protection and folllow up

ACCOUNTABILITY

A clear commitment from the Federal and National Boards
&
senior leaders to be transparent and to learn from experience

Go to Hinside or hi.org if you want to raise an alert

**For support or confidential exchange you can contact:
Mrs. Lucile Papon - HI Global Safeguarding Referent
(l.papon@hi.org)**

Table of content

Introduction: Policy statement

Humanity & Inclusion (HI) is an independent and impartial aid organisation working in situations of poverty and exclusion, conflict and disaster. The organisation works alongside vulnerable population taking action and bearing witness in order to respond to their essential needs, improve their living conditions and promote respect for their dignity and fundamental rights.

HI's Ethical principles are humanity, solidarity, impartiality & equity, independence, commitment.

HI works in a range of humanitarian, resilience and development contexts with vulnerable populations and in particular disabled persons and persons living with chronic disabling diseases; refugee populations, populations living in disaster areas or populations displaced by crises, conflicts and catastrophes. It includes as well, populations threatened by weapons, munitions and explosive devices during or in the aftermath of military.

Outraged by the injustice faced by people with disabilities and vulnerable populations, we aspire to a world of solidarity and inclusion, enriched by our differences, where everyone can live in dignity. **At HI, we believe that every child and adult have the right to protection and to live their lives free from sexual harassment and abuse, sexual violence, bullying, exploitation and any abuse of power, regardless of gender, ethnicity, political association, religion, sexual orientation and whether or not they have a disability.**

The respect and dignity of the people concerned, i.e. the beneficiaries of our actions, and of their communities are at the heart of the engagement of HI's staff and collaborators in all intervention settings. HI's reputation depends largely on the quality and accountability of its staff, and so on their conduct. Even during difficult missions, HI aims to promote engagement of the highest quality. Non-respect of the organisation's values undermines the reputation of the whole organisation. It is important to bear in mind that each member of our organisation represents HI both during and outside working hours. HI's staff regularly find themselves in positions of trust or power with regard to the beneficiaries and communities concerned.

HI is committed to safeguarding everyone who works in, or meets, the organisation. **The guiding principles of safeguarding covers the responsibility of HI to make sure our staff, operations and programmes do no harm to children and vulnerable adults, or expose them to abuse or exploitation, and includes protecting our staff from inappropriate behaviour such as bullying and all forms of harassment.** Demonstrating awareness of this and respect for HI's values means behaving in an appropriate fashion and feeling responsible for and complying with its codes and ethical principles.

1. Purpose and scope

1.1 Purpose

The Safeguarding Framework with associated Institutional Policies and Directives aim to:
- Ensure staff and other representatives of HI are given every opportunity to become aware of the standards and expectations that we have set ourselves;
- Provide a clear system of how to report concerns as soon as they are identified or suspected;
- Provide guidance on how HI will respond rapidly to any concerns and carry out investigations diligently;
- Ensure managers have appropriate training and support to deal with safeguarding issues;
- Comply with international standards in relation to safeguarding.

1.2 Scope

This Safeguarding Framework and associated components applies to all entities within the HI Federal Network including:
- The Federation;
- The National Associations;
- The HI's Institute of Humanitarian Action;
- All social missions in each country where HI works (Regional, affiliated or Standalone programs).

It applies to **all HI employees (international, national and HQs), volunteers, interns, consultants, contractors, trustees, plus accompanying partners and family members of international staff.** Where employees or staff are referred to in this document, these groups of people are included.

HI's operational partners and service providers are bounded to the Institutional Policies annexed to the partnership/service contract (HI's Child Protection Policy; HI's Protection of Beneficiaries from Sexual Exploitation, Abuse and Harassment (PSEAH) Policy; and Anti-corruption Policy). They have to respect and implement these principles unless their own organisation has a Code of Conduct and/or Safeguarding Framework that meets the required standard.[1]

This framework also applies to job applicants, potential applicants and former employees in relation to how they will be treated by HI.

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[1] Minimum standard being: Commitment to the Secretary General's Bulletin on Special Measures for protection from sexual exploitation and sexual abuse / 'Do no harm' principle incorporated into their work / Recognizing the rights of all beneficiaries to be protected from sexual exploitation and abuse / Sets out how this applies to all 'staff'; identifies and manages risk / Ensures the organisation's Code of Conduct integrates safeguarding measures into all areas of the organization.

2. Definitions and applications

2.1 Definitions

HI defines safeguarding as a set of organisational policies, procedures and practices designed to ensure that no harm comes to people as result of contact with an organisation's programmes, operations or people. There is a responsibility on preventing reporting and responding to harm or abuse of all adults and children beneficiaries by HI staff and its affiliates. It also includes protecting HI staff from inappropriate behaviour such as bullying and all forms of harassment.

Safeguarding measures are to:
- Ensure the safety and protection of groups, including children and vulnerable adults, with whom the organisation is in contact;
- Establish safe and respectful workplaces, which are free from harassment, abuse, and discrimination, maintain HI's reputation by high standards for good governance, accountability and sound management by preventing, addressing and learning from instances of wrongdoing.

➔ For a set of definitions that relate to Safeguarding, see Annex 1.

2.2 Applications

Our approach is **victim centred,** within an organisational culture that aims to prevent harm and abuse from occurring but which responds quickly and thoroughly to it when it does happen. We will learn from experience and share good practice throughout the organisation.

HI commits to a **zero tolerance stance on sexual exploitation, abuse and harassment and bullying but acknowledges that risk of these harms can never be complete eradicated.** For this reason, zero tolerance means encouraging reports, investigating and to sanction even minor infringement of the PSEAH and CPP and its related Code of Conduct in order to reinforce its overall importance and enhance deterrence.

We will work towards:

Victim support and enhanced accountability:
- Protecting the dignity and safety of the people our work serves;
- Ensuring victims and survivors are central to our safeguarding response;
- Ensuring rigorous and inclusive reporting and complaints processes.

Cultural change:
- Driving cultural change and addressing structural inequalities at all levels of the organisation (with a field perspective);
- Ensuring consistency in approach;
- Collaborating to improve employment practice.

Minimum standards:
- Applying internationally recognised standards and practices including the Protection from Sexual Exploitation and Abuse (PSEA) index of the Core Humanitarian Standard (CHS);
- Collaborating with others in our sector to advance global safeguarding practice;
- Ensuring policies and practice address the needs of vulnerable groups.

Organisational capacity and capability:
- Improving and sharing expertise of staff, partners and agencies with whom we work or collaborate;
- Equalise relationships between organisations delivering and receiving aid;
- Testing and scaling innovative technology solutions and as part of the wider sector.

3. Roles and responsibilities

The Safeguarding Framework places a number of responsibilities on various groups of people involved in HI's work.

These are as follows:

HI Federation Board of Trustees (via audit committee): Have a duty of care to ensure that appropriate policies and procedures are in place to prevent abuse from taking place. They have to ensure that any concerns have been appropriately managed by the organization. In line with the best practices defined by the organization and the local legislations if any, they also have a responsibility to ensure that all appropriate issues are reported.

The Board of Trustees in each of the HI Associations, including the Federation Board, may have responsibility for reporting to the relevant regulatory body in their countries of origin, in line with that country's legal requirements. An issue will be usually reportable if it results in, or risks, significant loss of HI's money or assets, damage to HI's property or harm to HI's work, beneficiaries or reputation but is dependent on the requirement in each Association's country. Some Association Boards (e.g. HI UK) may have a requirement or wish to appoint a Safeguarding Trustee Focal Point who will provide subject matter expertise and has delegated responsibility on behalf of the Board for ensuring that HI maintains effective safeguarding policies, procedures and practices. As well as reporting to the relevant regulatory body, depending on the incident, there may also be a requirement to notify the police, local authority and the relevant regulator or statutory agency including institutional and/or private donor(s).

HI's **Association Boards of Trustees** also have a similar responsibility as the main Federation Board to uphold the policies and procedures within their own country of operation and to share serious concerns to the HI Federation Board and/or other HI Associate members where:

- The report or incident directly or indirectly relates to an HI country mission, staff, funding or program operated by the HI Federation with the involvement of another HI Association;
- Is likely to impact on the wider HI reputation.

Cases or reports relating to issues that only directly the relevant National Association (e.g. a volunteer working in their own country of operation and/or local staff) will be handled directly by that National Association, though support and guidance may be provided the HI Federation office. However, as all formal reports will be logged through the EthicsPoint system, this will be pre-determined within this system, which is available across the HI network.

HI's Directorate:
- Maintains oversight of HI's incident reporting and management in relation to any breaches by HI staff of its codes or HR policies/internal regulations;
- Ensures that policies and procedures to prevent abuse from taking place are up to date, effective, appropriate and fully implemented;
- Will ensure the following principles are upheld:
  - Build a culture of openness to enable issues and concerns about safeguarding to be raised and discussed;
  - Build a sense of accountability between staff so that potential poor or abusive behaviour can be challenged;
  - Maintain a reputation of robust and high standards of working.

HI's Safeguarding Advisor supports the effective implementation of the safeguarding policies and procedures globally and is accountable for the effective case management of incidents related to PSEAH, CPP and Breaches of Code of Conduct. He / She reports to the Director of Risks and Audits, who in turn reports to the Executive Director of the Federation.

Management responsibilities: All managers. HI recognizes that often employees will be the first to know when there is cause for concern. All employees, interns, volunteers, consultants and contractors have a responsibility to act with due care and attention to safeguard the wellbeing of every person, specifically have a particular responsibility to uphold the standards within the Safeguarding Directive and to set an example ensuring that a culture of dignity and respect is maintained. Managers should encourage an open and transparent way of working that facilitates a strong safeguarding culture within and between teams. As well as upholding standards themselves, managers are expected to ensure that all staff understand the provisions clearly and challenge any unacceptable behaviour. In addition, managers must ensure that any reports or complaints are taken seriously and investigated promptly and thoroughly. All HI associations, programmes and social missions have a responsibility for ensuring that standards contained within each policy are upheld in each location. As well, policies are translated into relevant local languages and/or accessible formats and understood by all.

Individuals: Creating a safe working environment at HI is everyone's responsibility and failure to act on concerns or disclosures relating to harassment, abuse and exploitation is not an option. All individuals should remain vigilant, be prepared to take action and understand what to do in the event there is a concern to raise. Therefore, all HI representatives should understand and abide by the standards set out within the policies that uphold this framework. All HI employees are obliged to report any suspicions of sexual exploitation, abuse or harassment of others. Failure to report suspicion of abuse relating got someone else to a relevant person is a breach of HI's policy and could lead to disciplinary action being taken.

➔ Refer Annex 3 for contacts' names and addresses

4. Safeguarding standards

HI has established a set of Safeguarding Standards. A summary can be found below. An annual review of the standards is carried out by the Operations Department against a set of agreed trackers. These standards are allocated into three main components:

Component 1: A Culture of Safeguarding including:

Safe Environment and Culture – The organizational culture for safeguarding:
- HI's workplace is built on respect, tolerance, diversity and inclusion that delivers a respectful environment for all staff and supports staff to create a safe environment in which to deliver the organization's work.

Safe People – Recruitment, induction, training staff conduct and equal opportunities and non-discrimination:
- HI's HR policies, processes (references, background checks, interview questions) and systems sets out (induction, Safeguarding Module training), and implement organizational responsibilities around the employee lifecycle;
- Ensure staff with responsibilities for safeguarding are appointed and skilled to undertake their roles.

Component 2: Safeguarding people including:

Safe Programs – Risk management in programs and partnership arrangements:
- HI's programs and projects are designed and delivered in a manner that prevents harm and abuse to the people with whom we work and the communities in which we work.
- Safeguarding risks Assessments must be in place for each programme or department to analyse risk of harm through staff, programmes and operations.

Safe Reporting/Response – Whistle blowing and investigations:

- HI treats any allegations related to safeguarding extremely seriously. We strive to learn and identify areas in which we could improve, and welcome feedback from stakeholders.
- We commit to respectfully listening and supporting individuals who want to raise a concern or make a complaint. We will also ensure that genuinely held concerns would be thoroughly investigated.

Component 3: Accountability including**:**

Safe Governance – Accountability for safeguarding:

- HI's governance is based on our values and promotes transparency and accountability internally and externally.

Safe Communications & funding – Use of information and images:

- HI's communications and fundraising activities feature appropriate images and stories of children and communities and ensure that they are not exposed to harm and abuse.

5. Policies and procedures

The following IP, ID and guidance documents are in place to ensure that appropriate standards are maintained across the HI Federation, Associations and Social Missions.

➔ A summary can be found here and full details in Annex 2.

Policy Ref	Policy name	Date of next review / status
IP 01	Disability, Gender & Age Policy	2018
IP 02	Child Protection Policy	Updated 2019
ID 01	Code of Conduct: Prevention of abuse and safeguarding	January 2018
IP 03	Protection of beneficiaries policy from Sexual Exploitation, Abuse and Harassment	Updated 2019
IP 04	Anti-Fraud, Bribery and corruption Policy	Updated 2019
DI 02	Reporting Suspicions on fraud and abuse	June 2018

	Whistle Blowing Policy	Under development. Will merge/ replace the DI02 Reporting Suspicions on fraud and abuse
IP 05	Safety and Security Policy	Updated 2018
	Centralized process of alerts and incidents (flow chart & guidance documents)	October 2020

In addition, the HI Federation headquarters, along with each National Association and HI social missions in the field have in place a series of locally appropriate policies relating to: Recruitment, Grievance, Disciplinary processes for staff, volunteers and local supporters, in line with local legislation, along with other HR/staffing concerns (around pay, leave, performance, GDPR policy, etc.). These are often contained in a single document E.g. Staff Manual, or Internal Regulations or similar documents. Individual employee contracts detail the specific contractual obligations placed on staff, including the need to comply with the above-specified policies of HI. Similarly, other consultants, service providers and partners are contracted and required to adhere to organisational safeguarding policies. At last, HInside – the HI intranet also holds a series of toolkits and guidance.

➔ Refer to Spaces: Safeguarding: Protection policies and Code of Conduct and Risk Management and Internal Audit.

6. Implementation

The Safeguarding Framework and its associated references are deployed via:
- **Staffing** – A senior level full time safeguarding position will be in place at Headquarter level, safeguarding focal points will be recruited across the organisation (fields), and Safeguarding responsibilities will be included in job descriptions. All staff with responsibility for implementation will receive training.
- **Prevention** – Safeguarding will be integrated into all aspects of HI's work and systems, including awareness raising from application stage and continuous throughout an employee's employment at HI. Risk assessment will be considered at all levels including when working with partners, when designing new programmes, supporter or volunteer activities and setting up new operations at local and national level.
- **Reporting and responding mechanisms** – Steps for raising or reporting safeguarding's concerns will be known to all, investigation and incident management procedures are clear and understood; duties and responsibilities are clear for those who have safeguarding responsibilities, particularly managers, HR teams and focal points.
  - ➔ See: Centralized process of alerts and incidents (flow chart & guidance).

- **Implementing, maintaining, reviewing and monitoring the safeguarding policy** – training and capacity building of staff and partners, monitoring and reporting and continuous review of the framework.
- **Budget** – Will be available to support with organisation wide safeguarding activities.

6.1 Focus on Safeguarding Focal Points

HI's global network of Safeguarding Focal Points (based mostly in country programmes) support HI to prevent and respond to sexual harassment, abuse and exploitation by receiving concerns and forwarding these to the team, raising awareness and promoting best practice. Focal points are NOT required to investigate concerns or complaints themselves.

> While this is a global policy, where necessary, the policy and its appendices can be contextualised or adapted for children and/or accessible formats by HI entities to fit the local legal and cultural context, without diluting it. Any adaptations besides language translations will be in consultation with the global Safeguarding Advisor, who will facilitate internal mechanisms for approval of the adaptations.

6.2 Focus on reporting and investigation

HI recognises that the standards outlined in each policy can only be upheld if strong reporting channels exist and understood by all. As such, each policy outlines how concerns should be raised. Each policy also outlines what action may be taken where incidents or concerns arise.

The Policy on the Code of Conduct states that it is the duty and responsibility on everyone who is part of HI (members and personnel) to report any concern, query, suspicions or allegations (even if the information or allegation is vague) with regards to the Code of Conduct, the PSEA and the Child Protection Policy with manager/supervisor or if not possible, with another from the hierarchy or designated focal person, and as soon as possible. This can be done without sharing details of cases where information has been shared in confidentiality. Failure to report suspicion of abuse relating to someone else to a relevant person is a breach of HI's policy, and could lead to disciplinary action being taken. Although we strongly encourage reporting through the available channels, for the avoidance of doubt, there is no obligation placed on any individual to report any incident that has happened to them. However, where there is a clear legal requirement placed on HI to report, the decision will be made by HI in consultation with the alleged subject of abuse.

HI recognises that not all complainants may be willing to reveal their identity. This does not necessarily have any bearing on the truth of the complaint but may be an indication of fear of reprisal. HI provides an externally supported confidential whistleblowing mechanism (Navex – Ethics point) outside the line reporting which it provides as a last resort and as such does

not encourage anonymous reports but commits itself to strict anonymity through this externally supported system which limits the identify of information being passed through it, in line with French law.

In addition, rumours must not be left unchecked and may be an early warning of a greater problem. HI will take consistent rumours seriously and they must therefore be reported and investigated.

Support for Survivors and Victims: HI will always offer support to survivors and victims, regardless of whether a formal internal response is carried out (such as an internal investigation). Support can include Specialist psychosocial counselling, and/or access to other specialist and appropriate support as needed (medical and where possible legal). Survivors and victims can choose if and when they would like to take up the support available to them. On hearing a complaint or concern, the priority is to ensure and check if the complainant is in need of mental or physical support. All further action will only be taken with the victim's agreement or consent unless they are a child or vulnerable adult.

Raising a complaint within HI (internal alert system): Anyone can raise a concern or make a complaint to HI about something they have experienced or witnessed. Reporting/ complaints mechanisms are encouraged at all levels of the organisation and the first choice should be along the managerial chain, though it is possible to bypass your immediate manager if you feel it is problematic to do so. Complaints or concerns can be made in any language and arrangements will be made for a confidential translation. In addition, complaints are accepted through the Ethics point system and all locally adapted processes.

➔ See [Reporting suspicions on fraud and abuse policy](#) for further details

Community complaints (Feedback and Complaint Mechanism – FCM): Communities will be informed of how they can make a complaint or raise a concern if necessary. Arrangements will vary between each programme.

➔ See: [How to set up a field-based system for handling feedbacks and complaints from populations](#), HI, 2020

Complaints about partners: If HI receives a complaint about an operating partner organisation, it will expect the partner to respond quickly and appropriately. HI can assist an operating partner organisation to ascertain its obligations under local law to refer the matter to the police or other statutory authorities for criminal investigation. Where appropriate, HI could work with the operating partner to address the issue through an appropriate independent investigation. If the outcome is that the abuse has occurred, ongoing work with the partner cannot involve the individual(s) concerned. If there is a reason to believe that a partner has dealt with an allegation of abuse inappropriately then they risk withdrawal of funding or ending the relationship (including networks and consortia).

Complaints from partners: Partners can also complain to HI and within the framework of contractual relationships. Partner organisations and contractors who supply goods and services must also be informed of the existence of our policies, the persons to be contacted and the methods to be used for reporting and resolving any incidents or disputes. They too

can, if necessary, move up through the management chain within HI and, where utilise the centralised Ethics point system to lodge a complaint where they feel normal channels are deemed too risky or unsafe.

Complaints from outside of HI: Everyone has the right to complain to HI. This can be sent in writing to HI Federation offices in country or centrally or directly to National Associations in the relevant country of operations. They can also complain via the website, by completing a complaints form, available on HI's website: https://hi.org/en/reporting-form

Process of investigation: All credible allegations (credible = initial fact-check done) are entitled to a proper investigation conducted in strict accordance with HI investigations' principles. Ordinary or Crisis cells will be launched under the Authority of the General Director or Deputy General Directors and coordinated by the R(esponsible) dedicated to the complaint. HI will insure a transparent and fair process of investigation – conducted by a team of investigators bounded by oaths of confidentiality and only accountable of an anonymised investigation & recommendation report to the R of the investigation cell.

Statutory and external reporting: The decision about whether to refer an allegation to local police or statutory authorities is made by the person who it is alleged has been the subject of abuse ("the victim/survivor" – who may or may not be the complainant). HI will support the victim/survivor and/or complainant regardless of whether they wish to report to local police/statutory authorities or not. However, HI's approach will always be to comply with the reporting obligations under local law. Where there is a clear legal requirement placed on HI to report, HI will make this decision in consultation with the alleged subject of abuse. If someone's life is in danger or the matter relates in any way to a child or adult at risk, then some decisions may have to be taken by HI (For example, to contact the police or statutory authority).

The principle of 'survivor or victim-centred must be balanced against risk and protection of vulnerable groups in every instance. If the victim/survivor is a child or adult at risk, then decisions about their welfare may have to be made by others. However, as far as is possible and appropriate they will be engaged in the conversation about their own welfare.

Regulatory and donor reporting: HI's regulatory authorities and donors have different reporting mechanisms in relation to safeguarding incidents. All incidents that involve national, international staff or operating partners, must be reported immediately via the centralised process of alert and incident flowchart.

7. Monitoring, review and references

7.1 Monitoring & review

In order to ensure the standards within each policy are effectively in place and in line with international standards:

- Direction of Operations will monitor the deployment Plan for programs at least 2 times per year with key milestones follow up in Dashboards;
- The DRA will monitor and report Case Management situation to DDO every month;
- The DRA will analysis the Case Management situation and update the risk to report to the Risk Committee 3 times per year;
- Activities, results and analysis of the Safeguarding implementation and management will be presented to the Board sub-committees and National Association Boards / Federation Board at least once a year;
- The Safeguarding Advisor will update each policy in a continuous process of alignment with the last internal evolutions and international standards with the validation of the Directorate and Board accordingly.

7.2 References

Internal: All Safeguarding Policies are listed. In addition: Disability Gender, and Age Policy, Recruitment processes and toolkits (found in HInside or within each HI Association member HR /staff manual or equivalent), HR manuals in each country program cover the guidance on local customs, legal requirements for country of operation and additional Disciplinary and Grievance processes and policies.

External:
- IASC Core Principles on PSEA
- UN Secretary General's Bulletin: Special Measures for protection from sexual exploitation and sexual abuse, 9 October 2003
- UN Convention on the Rights of the Child
- UN Convention Rights of People with Disabilities
- The Core Humanitarian Standard (including the PSEA index)

Approval and Dates:

The HI Federation Directorate has approved this Directive in December 2020.
This version take effect from January 2021.

Policy Owner:
Deputy Manager Director of Risks and Audits

Annexes

Annex 1: HI's Safeguarding references for definitions

Terms	Definitions	Reference
Safeguarding	A set of organisational policies, procedures and practices designed to ensure that no harm comes to people as a result of contact with an organisation's programmes, operations or people.	HI – inspired by CBM Safeguarding definition
Code of Conduct	A set of rules about how to behave and interact with other people.	HI Code of conduct
Child	As a person below the age of 18.	HI Child Protection Policy
Child abuse	is a general term covering all forms of physical and/or emotional ill-treatment, sexual assault, neglect or negligent treatment or exploitation resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship or responsibility, trust or power	HI Child Protection Policy
Vulnerable Adult	Persons over 18 years old who, because of their disability, age, gender, sexual orientation, socio-economic status, geographical location, ethnic origin, religion or political opinion may find themselves unable to satisfy their fundamental needs, are particularly exposed to risks.	HI Direction of Protection
Vulnerable People	Persons or population groups who, because of their health or social condition may find themselves unable to satisfy their fundamental needs, are particularly exposed to risks and therefore require specific measures to be put in place. The generic notion of "vulnerable population" is variable according to the context. It may include persons made vulnerable by age, gender or temporary impairment, and notably includes destitute and excluded people.	HI Mission scope of activity
Physical abuse (child)	The actual or likely physical injury to a child or failure to prevent physical injury or suffering to a child.	HI Child Protection Policy

Emotional abuse (child)	Includes verbal abuse, discrimination and psychological maltreatment. It refers to the actual or likely adverse effects on the emotional and behavioral development of a child caused by persistent or severe emotional ill-treatment or rejection.	HI Child Protection Policy
Sexual abuse (Child)	Refers to the actual or threatened physical intrusion of a sexual nature whether by force or under unequal or coercive conditions.	HI Child Protection Policy
Neglect (Child)	Refers to any act of omission or failure to provide, whether deliberate or otherwise, that compromises the health, security and development of a child, with due consideration to context, resources and circumstances. It refers the on-going incapacity to satisfy the basic physical and/or psychological needs of the child resulting in a high risk of serious physical and cognitive disorders.	HI Child Protection Policy
Child Labour	Refers to employment and work of child below the age or 15.	HI Child Protection Policy
Protection (In HI programming context)	Reducing violence based on disability, gender and age and ensure that vulnerable women, boys and girls, people with disabilities, and other at-risk groups such as migrants and displaced population in specific context, are less exposed to violence and maintain dignity, autonomy, and control over their own lives. HI aims at people to be safe in their communities and receive support when they experience harm.	StraTech – Direction of Protection
Sexual abuse	Refers to actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.	HI Protection of Beneficiaries from sexual exploitation, abuse or harassment (PSEAH)
Sexual exploitation	Is any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.	HI PSEAH

Sexual Harassment	Is the act of repeatedly subjecting a person to unwelcome verbal or physical conduct of a sexual or sexist nature when such conduct either compromises the victim's dignity through demeaning or humiliating words and actions, or creates an intimidating, hostile or offensive environment for the victim. Any form of intense pressure, even if not repeated, with the actual or perceived goal of obtaining sexual favors, whether for the offender or for a third party, it is also considered to be sexual harassment.	HI PSEAH
Bullying	Actions or words that seek to harm, intimidate, or force in order to gain power and control. Examples: unnecessary criticism, spreading rumours, intentionally undermining, deliberate isolation, making inappropriate personal comments, hitting, pushing, damaging or stealing personal possessions. (May be referred to differently in some countries, e.g. as harassment; This may be legally defined in various country labour laws differently)	Mines Advisory Group (MAG)
Harassment	Harassment consists of repetitive and unwanted conduct, whether verbal, physical or visual, which is related to a person's profile or characteristic with the purpose or effect of violating the dignity of a person or creating an intimidating, hostile, degrading, humiliating or offensive environment. (This may be legally defined in various country labour laws differently)	French Law – general definition
Whistle blower	A person who exposes information that he or she reasonably believes, at the time of disclosure, to be true and to constitute a threat or harm to people or organisations, such as a violation of national or international law, abuse of authority, sexual abuse and exploitation, fraud, or harm to the environment or public safety.	HI focal Point Training
Whistleblowing	Refer to a **mechanism** to report facts or suspicions of misconduct within our organization or with our operating partners.	HInside whistleblowing

Whistleblowing Protection policy	A policy that encourages staff members to report concerns, the disclosure of which are typically in the public interest, particularly in countries where whistleblowing is part of national legislation. Concerns are typically those regarding a criminal offence, health and safety, damage to the environment or injustice. Reporting on PSEAH can fall within an organisation's Whistle-blower Protection policy. Whistle-blowers are often protected by law and cannot be treated unfairly or lose their job because they report these concerns.	CHS PSEAH Implementation Handbook (Quick reference) revised 2020
Persons with disability	Include those who have long-term physical, mental, intellectual or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others.	HI Policy on Disability, Gender and Age (DGA)
Discrimination	Relates to any distinction, exclusion or restriction on the grounds of disability or other criteria (sex, age, ethnic origin, etc.) which has the purpose or effect of compromising or preventing the recognition, enjoyment or exercise of all human rights on an equal basis with others. Discrimination includes refusing to provide reasonable accommodation.	HI Policy on DGA
Equality	Is when people enjoy rights, opportunities and resources on an equal basis with others, irrespective of disability, gender or age.	HI Policy on DGA
Confidentiality	An ethical principle that restricts access to and dissemination of information. In investigations on sexual exploitation, abuse, fraud and corruption, it requires that information is available only to a limited number of authorised people for the purpose of concluding the investigation. Confidentiality helps create an environment in which witnesses are more willing to recount their versions of events and builds trust in the system and in the organisation.	CHS PSEAH Implementation Handbook (Quick reference) revised 2020
Fraud	Pertains to acts which aim to obtain an undue material or moral advantage by deliberately circum-venting internal rules, contract rules or laws to the detriment of HI or a third party; individuals, commu-nities, organizations, corporations or institutions.	HI Fraud & corruption policy

Bribery & Corruption	Associated with non-ethical conduct, cover a range of practices including: conflicts of interest, fraudulent commissions, illicit gifts and invitations, extortion, theft or misappropriation of materials or funds, facilitation payments, money laundering; as well as abuse of power, nepotism and favoritism.	HI Fraud & corruption policy
Zero tolerance versus Zero cases	HI does not commit on Zero Cases in our organization but commits on Zero Tolerance stance on sexual exploitation, abuse and harassment and bullying. Zero Tolerance means encouraging reports, investigating and to sanction even minor infringement of the PSEAH and CPP and its related Code of Conduct in order to reinforce its overall importance and enhance deterrence. HI commits as well on accountability by maximizing protection and mitigation measures.	HI Focal Point Training
Beneficiary	Children and vulnerable adults benefiting or impacted by HI's intervention.	HI PSEAH
Operational Partner	Operational partnership is a form of collaboration between two or more structures that, in theory, gives precedence to cooperation over substitution, subordination and/or competition. It is a relationship constructed and negotiated in order to achieve a common goal that involves 3 elements: • A mutual commitment to the execution of a project or part of a project. • Shared accountability to donors, beneficiaries and national authorities. • Shared responsibility for project results.	HI Practical guideline on Operational Partnership
Project's stakeholders	They are the agencies, organisations, groups or individuals who have a direct or indirect interest in the action or in its evaluation. Target-stakeholders (or organisations): these are all organisations whose relationship with HI, or with its partners, is based upon the receiving of goods or services.	HI Practical guideline on Operational Partnership

Do No Harm	**Emergency:** "Do no harm" is to avoid exposing people to additional risks through our action. **Development:** "Do no harm" means taking a step back from an intervention to look at the broader context and mitigate potential negative effects on the social fabric, the economy and the environment.	DNH policy
Victim centred (approach)	Seeks to empower the survivor by prioritizing her rights, needs and wishes. HI is always promoting this approach first – meaning we can decide case by case to take risks for the organization if it means protecting the victims.	HI Focal Point training
Risk	Concrete consequences of a threat to which the staff and/or organisation is exposed. Risk can concern staff, property or goods, or HI's reputation, image or presence It means the potential for something to go wrong (an incident or an accident), or the likelihood of a negative consequence to an action.	HI Operational Security Guide
Risk Assessment and Management	Risk assessment is a means of identifying threats and the potential associated risks. It comes with a range of mitigation measures.	HI Operational Security Guide

Annex 2: HI's Safeguarding and related Policies

Policy	Key Messages
Child Protection Policy	The Child Protection Policy states the commitment of HI to the safeguarding of all children who are participating in or impacted by its activities. This policy aims to protect children from intentional and non-intentional harm or abuse. It sets out: • Common values and principles; • Provides guidance on how to protect children from harm; • Good practice and sets out procedures that must be followed by HI representatives – including how HI will recruit and induct staff; • Makes clear that everyone must report concerns where children may be at risk, including partners.
Code of Conduct: Prevention of abuse and safeguarding	The HI code sets forth the expected behaviours and practices constituting the organisation's minimum standards and actions to ensure relations with the beneficiaries or between members of HI's staff are respectful of the ethics developed by the organisation via its policies. Sets out expected standards of personal behaviour and ensure professional and personal actions do not bring the organisation into disrepute in terms of: • Relations with beneficiaries; • Elimination of sexual exploitation and abuse situations; • In the workplace; • In communications. Standards are mandatory and full compliance is expected in all circumstances. It is also does not replace existing documents (contracts, HI byelaws, other protection and Rules of procedures documents). It lays out how to report. Managers are additionally required to ensure their team members respect this code by ensuring an exemplary working environment.
Protection of beneficiaries policy from sexual exploitation, abuse and harassment	This policy applies to all those working with HI and details the principles on how HI will commit to investigate all allegations abuse of beneficiaries Through this policy, Humanity & Inclusion (HI) expresses its determination to: • Combat the sexual exploitation, abuse and harassment of children and vulnerable adults benefiting from and impacted by HI's intervention.

	• Implement measures to reduce risks on its programmes, whatever the context. HI affirms its commitment of zero tolerance of any form of sexual exploitation, abuse or harassment. There is a PSEAH Toolbox on HInside to support managers in dealing with PSEAH reports.
Anti-Fraud, Bribery and corruption Policy	The Anti-Bribery Policy states the position of HI on the prevention and detection of fraud, sets out HI strategy for preventing and detecting fraud, corruption and other wrongdoing and sets out responsibilities and procedures to be followed if fraud is detected or suspected.
Reporting suspicions of fraud and abuse Policy	This policy outlines the system put into place for steering, reporting, administration and control mechanisms which are intended to ensure not only the proper management of our activities, but also to prevent scheming, whose effect would be: • To affect our resources, the integrity of our operations or the quality of the aid intended for our project beneficiaries; • To cause harm to the physical and psychological integrity and dignity of persons, including HI's staff, beneficiaries and partners or members of the community in the countries in which we work. And is intended to support the implementation of Humanity & Inclusion's institutional policies and guidelines, especially: • Preventing bribery and corruption, • Protecting beneficiaries from sexual exploitation and abuse, • Code of conduct: preventing abuse and safeguarding persons, Child protection. It presents recommendations for the implementation of the following: Internal signalling of suspicions and incidents, Reporting in the processing settings, Feedback from partners and beneficiaries, Whistleblowing.
Whistle Blowing Policy – not yet developed; This policy will eventually replace the 'Reporting	A Whistle Blowing Policy is being designed to encourage staff and others (including the public) to feel confident to make a disclosure of concerns, to provide avenues for staff to raise those concerns and reassure staff that they will be protected. It will: • Defines whistleblowing, reporting malpractice and raising a concern; • Sets out the process for reporting a concern; • Explains how issues will be dealt with;

Suspicions policy' mentioned above.	• Requests staff to use internal procedures before reporting externally; • Assures confidentiality and protection from victimisation and harassment; • Clarifies that malicious/untrue allegations will not be tolerated.
Centralised Process of Alert and Incident management of reports	A flowchart of how HI manages incident reports whether they come internally or externally; how they are logged onto NAVEX/Ethics point which will collect all reports (whether they have initially been received through this system or manually), whereby they are classified and assigned to the relevant people to investigate, check credibility and resolve. It also includes reminders of who else needs to be kept informed. (e.g. Regulatory body; Donor); It is designed to maintain appropriate levels of confidentiality limited to only those necessary to investigate and resolve reports. The Incident and Crisis management guidelines details this further in narrative form.
Disability, Gender and Age policy	This policy sets forth HI's different levels of commitment with regard to Disability, Gender & Age, and the changes to be made in how the organisation works, including with its partners, in line with 2025 strategy. These commitments apply to the whole HI network, and are to be taken into account at operational, technical and advocacy levels, and notably in technical and operational strategies, programming policies, etc.
Safety and Security Policy	This policy sets forth the safety and security policy adopted by HI for application on its programmes wherever its interventions may be required. It aims to enable the implementation of its programmes while minimizing the risks for its staff, partners and beneficiaries. HI provides its teams with procedures and tools they need for managing safety and security and these standards should cover the management of day-today safety and security as well as exceptional crisis management,
General Personal Data Protection Policy (2020)	HI has made the commitment to guarantee the protection of the Personal Data it obtains in carrying out its activities, and to comply with the laws and regulations applicable to Personal Data and Special Category (or Sensitive) Personal Data Processing. This Policy's objectives are to: • Define HI's commitments with regard to the principles imposed by Applicable Legislation, and in particular Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the

	processing of personal data and on the free movement of such data, in effect since 25 May 2018;
	• Define the roles and responsibilities of key contributors;
	• Ensure that appropriate measures and procedures and appropriate governance and supervision entities are set up to guarantee compliance with commitments and Applicable Legislation.
Toolkits and guidance notes for social media, interviews etc.	There are a range of guidance notes and toolkits that cover a number of topics from: social media policy, interviews of beneficiary guidelines, photography guidelines. In addition, there are a large number of documents relating to programme management (Project Planning, Monitoring and evaluation, risk assessments for projects, Policy against violence, managing appraisals etc. To be found on HI Intranet: HInside
Staff Handbook	Each country and National Association has developed a staff or HR handbook that lays out the benefits, policies and procedures and rules pertaining to how it operates in their particular country of operation. In the HIUK, this includes grievance, disciplinary and other relevant UK HR policies that are required under UK law (e.g. Equal Opportunities, Dignity at work etc.); HI Federation in France has 'internal rules' in line with French law; other countries have similar processes, in line with their own country legislation. These all follow the general principles laid out in the core policies mentioned above.

Annex 3: Contact list for advice and reception of complaints

Year 2020 – 2021

Direct Manager (field of HQ)	Verbal or by email
Senior manager (fied or HQ)	Program Director, National Association Director, Geographical Directors
Safeguarding Advisor: Mrs Lucile Papon	l.papon@hi.org
Fraud and Corruption Referent: Mr Luciano Loiacono	l.loiacono@hi.org
Director of Risk and Audit: Mrs Emmanuelle Weber	e.weber@hi.org
Director of Human Resources: Mrs Céline Blay	c.blay@hi.org
General Director: Mr Manuel Patrouillard	m.patrouillard@hi.org
Ethics Point Platform	HInside (https://hinside.hi.org/intranet/jcms/) or hi.org (https://hi.org/en/reporting-form)

Humanity & Inclusion's Safeguarding Framework

The guiding principles of safeguarding covers the responsibility of HI to make sure our staff, operations and programmes do no harm to children and vulnerable adults, or expose them to abuse or exploitation, and includes protecting our staff from inappropriate behaviour such as bullying and all forms of harassment.

The Safeguarding Framework – with associated Institutional Policies and Directives – aim to:

- Ensure staff and other representatives of HI are given every opportunity to become aware of the standards and expectations that we have set ourselves;
- Provide a clear system of how to report concerns as soon as they are identified or suspected;
- Provide guidance on how HI will respond rapidly to any concerns and carry out investigations diligently;
- Ensure managers have appropriate training and support to deal with safeguarding issues;
- Comply with international standards in relation to safeguarding.

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