Policy Level: Level 1: Global Policy
Policy Title: Safeguarding Policy
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Effective Date: April 15, 2019
Owner: Michelle Guillermín, Chief Administrative Officer
Approver: Laurie Adams, CEO

Approved & Disseminated by:

[Signature]
Laurie Adams
Chief Executive Officer

This Safeguarding Policy should be read and applied in conjunction with the WfWI Code of Conduct (L1-2019-02), issued in February 2016, and the WfWI Whistleblowing Policy (Circular #2015-02), issued in July 2015.

SECTION 1 – OBJECTIVE AND SCOPE

OBJECTIVE

This policy was created to confirm Women for Women International’s commitment to protecting all vulnerable persons and, in particular, women and children from harm, harassment, bullying, abuse and exploitation.

SCOPE

This policy applies to all Women for Women International staff and representatives:

- All Employees, full time or part time, international or national, and to those engaged on contracts, e.g., Consultants, Contractors, Researchers, etc. (referred to as “staff”);
- Interns, Volunteers, Board Members, Trustees (referred to as “representatives”)
- Staff and Representatives of partner agencies and any other individuals (referred to as “representatives”);
- Groups, organizations, or individuals who have a formal contractual relationship to WfWI (referred to as “representatives”).
- Donors, board members, journalists, celebrities, politicians and other people who visit WfWI programs or offices must be given a copy of this policy and be made aware that they must act in accordance with it whilst visiting programs/offices (referred to as “representatives”).
SECTION 2 - POLICY

Women for Women International takes seriously our responsibility for safeguarding practices and to protect all vulnerable persons from harm, abuse, neglect, bullying, harassment and exploitation in any form. **WfWI has zero tolerance for harassment, abuse and exploitation.**

It is the policy of Women for Women International (WfWI) that we conduct our activities according to the highest ethical and professional standards and in a way that protects the rights and safety of all persons. We reaffirm WfWI’s core values and commitment to the United Nations Convention on the Rights of the Child (UNCRC), and we have signed the InterAction CEO Pledge on Preventing Sexual Abuse, Exploitation and Harassment by and of NGO Staff as a reminder of certain standards of conduct that all staff and representatives must meet while working for or on behalf of Women for Women International. We expect all associated parties to uphold these same standards when they are not directly working with our organization and may terminate a relationship with any organization or person that does not uphold the highest personal and professional ethical standards.

All WfWI staff and representatives are expected to conduct themselves in a manner consistent with this commitment and obligation to protect all persons from harm. Any violation of this policy will be treated as a serious issue and may result in disciplinary action, up to and including termination and any other available legal remedy.

It is WfWI’s policy to ensure compliance with host country and local welfare and protection legislation, or international standards, whichever affords greater protection, and with U.S. law, where applicable. The requirements of this policy are in addition to any other applicable legal requirements.

**Definition of “child”**
In line with the UN Convention on the Rights of the Child, and for purposes of this policy, Women for Women International defines a child as anyone under 18 years of age. WfWI recognizes that some national legislation recognizes the possibility that children will obtain the age of majority earlier under certain circumstances but this WfWI policy applies to anyone under the age of 18 regardless of national legislation.

**Policy Principles**
- All people, including children and other vulnerable people, have equal rights to protection from abuse and exploitation.
- All people, including children, will be treated with respect regardless of gender, nationality or ethnic origin, religious or political beliefs, age, physical or mental health, sexual preference and gender identity, family, socio-economic and cultural background, or any history of conflict with the law.
- Everyone has a responsibility to support the care and protection of all people and in particular, children, women and other vulnerable people.
- WfWI has particular responsibilities to the vulnerable people we serve.
These particular responsibilities extend to those individuals or organizations who are associated with WfWI. Therefore, everyone working for or associated with WfWI's work must be aware of and adhere to the provisions of this policy.

Our decisions and actions in response to safeguarding concerns and breaches of this policy will be guided by the principle of 'the best interests of the person impacted'.

Women for Women International is committed to a survivor-centered approach to any instance of sexual exploitation and abuse and will prioritize the needs, rights and wishes of the survivor. The survivor has a right to:

- be treated with dignity and respect and not be exposed to victim-blaming attitudes.
- choose the course of action in dealing with the violence instead of feeling powerless.
- privacy and confidentiality instead of exposure.
- non-discrimination instead of discrimination based on gender, age, race/ethnicity, ability, sexual orientation, HIV status or any other characteristic.
- receive comprehensive information to help them make their own decision instead of being told what to do.

SECTION 3 – PROCEDURE

1. All WfWI staff and representatives must act in accordance with this policy in both their professional and their personal lives.

2. All WfWI staff and representatives must sign the Declaration of Acceptance, prior to or at the time of issuing any employment or contractual agreement, or before travel to a WfWI location.

3. All WfWI staff and representatives must:
   
a) report any vulnerable person abuse and/or protection concerns immediately in accordance with procedures laid out in the WfWI Whistleblowing Policy;
   b) undertake induction and training on this policy which is relevant and appropriate to their position so that they can undertake their responsibilities effectively and with confidence;
   c) cooperate fully and confidentially in any investigation of concerns or allegations of vulnerable persons' abuse;
   d) respond to a vulnerable person who may have been abused/exploited in accordance with his/her best interest and safety;
   e) identify, minimize, and attempt to avoid potential situations of risk for vulnerable people;
   f) identify and avoid potential situations which may lead to staff behavior being misinterpreted;
   g) ensure, when making images of vulnerable people (e.g. photographs, videos), that they are respectful, that the people are adequately clothed and that sexually suggestive poses are avoided;
   h) ensure that any image or recorded case history of a vulnerable person does not place him/her at risk or render him/her vulnerable to any form of abuse;
i) ensure that this policy is complied with if any vulnerable person is to participate in any activity other than as a program participant, e.g. a campaigning event, awards ceremony, panel or any other event or in internet social networking.

4. All WfWI staff and representatives must never:
   a) hit or otherwise physically assault or physically abuse a vulnerable person;
   b) have sexual intercourse, or engage in any sexual activity, with a program participant or anyone under 18 years of age, regardless of the age of consent locally. Mistaken belief in the age of the child is not a defense;
   c) develop relationships with vulnerable people which could in any way be deemed exploitative or abusive;
   d) act in ways that may be abusive or may place a vulnerable person at risk of abuse;
   e) use language, make suggestions or offer advice to vulnerable people which is inappropriate, offensive or abusive;
   f) behave in a manner which is physically inappropriate or sexually provocative;
   k) condone, or participate in, behavior of vulnerable people which is illegal, unsafe or abusive;
   l) act in ways intended to shame, humiliate, belittle or degrade vulnerable people, or otherwise perpetrate any form of emotional abuse;
   m) discriminate against, show unfair differential treatment or favor to particular vulnerable people to the exclusion of others;
   n) act as negotiator or assist in the process of financial settlement between the family of a victim of sexual abuse or exploitation and the perpetrator;
   o) participate in a professional situation where a WfWI staff or representative is alone with a child.

Best practices require that multiple WfWI personnel are in attendance when children are present. This is not an exhaustive or exclusive list. WfWI persons should at all times avoid actions that may allow behavior to be misrepresented or constitute poor practice or potentially abusive behavior.

5. All WfWI staff and representatives must be aware that any allegation of the abuse or exploitation of women, children or other vulnerable parties made against them will be investigated, under these Safeguarding policies:
   a) by consideration of referral to statutory authorities for criminal investigation and prosecution under the law of the country in which they work; and/or
   b) by WfWI in accordance with the WfWI Whistleblowing Policy and Code of Conduct.

6. All agreements between a) WfWI and b) implementing partners, other individuals, groups or organizations who have a formal contractual relationship with WfWI that involves them having contact with children, women or other vulnerable people must include agreement on the issue of this Safeguarding Policy. Partner agencies must adopt this policy or have developed their own policy of a similar standard.

7. Partnership agreements must clearly outline agreed procedures for reporting and investigating concerns involving breaches of the policy involving issues of child abuse and exploitation or harassment, abuse or exploitation of women or other vulnerable parties.
8. By following this policy, WiWI persons will be both playing their part in safeguarding vulnerable people and developing best practices. As with the WiWI Code of Conduct, if a staff member breaks this policy or fails to meet the standard of behavior that it requires, disciplinary action may be taken. This may include dismissal and/or referral to national authorities for criminal investigation and prosecution, should the law be broken in the country in which an offence is committed.
APPENDIX 1: Declaration of Acceptance

I hereby acknowledge that I have received and understand the WWI Safeguarding Policy (L1-2019-01) issued on April 15, 2019 (the "Policy"). I agree to comply with all aspects of the Policy, and I understand that my ongoing compliance with the Policy is a condition required for my continued employment and participation in any visits to WWI program sites or any other WWI related activities.

________________________________________
Name

________________________________________
Signature  Date