



**Global
Communities**

Safeguarding Policy

Updated 2023

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Global Communities Safeguarding Policy

1. Purpose

1.1 This policy aims to protect all individuals who come into contact with Global Communities, particularly children, adults at risk, program participants, partners and staff, from harm or abuse, which includes harm arising from:

- The conduct of staff or individuals associated with Global Communities
- The design and implementation of Global Communities programs and activities

2. Scope

2.1 This global policy applies to all Global Communities staff and those potentially affected, including program participants and members of the communities in which we work. The term staff refers to all permanent and temporary full and part-time employees and individuals engaged in work or visits related to Global Communities, including but not limited to the following: on-call, consultants; incentivized workers; interns, volunteers; program visitors; and board members during and outside of work hours.

This policy does not cover:

- Protection concerns in the wider community not perpetrated by Global Communities staff or individuals associated with Global Communities.



3. What is Safeguarding?

3.1 Safeguarding is the responsibility of all organizations to ensure that their people, programs and practices respect the rights and dignity of the people with whom the organization comes in contact—especially children and adults at risk—so they can live free from abuse and harm.

This definition aligns with Global Communities' vision and mission. As such, the duty to safeguard and do no harm applies without exception to all Global Communities staff, programs and partners. Safeguarding at Global Communities includes preventing sexual exploitation and abuse, sexual harassment in the workplace, anti-trafficking, bullying, discrimination and safeguarding children.

4. Key Principles

4.1 Global Communities is committed to safeguarding the people we work with and the communities we serve. We are guided by our values of dignity, integrity, humility, connection, creativity and the following principles:

Abuse of Power – We recognize that misconduct, including sexual misconduct, often stems from a misuse of authority, rank or relationships. Therefore, we take proactive measures to address any reported abuse at all levels of the organization.

Accountability and Transparency – We value all individuals and uphold everyone's right to be safe is upheld. Safeguarding concerns are reported and dealt with quickly and appropriately.

Confidentiality – We restrict access to and dissemination of information to those who need to know. Confidentiality helps create an

environment in which witnesses are more willing to provide their versions of events and builds trust in the system and organization.

Culture of Safety and Respect – We promote an environment in which people feel safe and respected and are met with empathy and compassion when they raise a concern about misconduct.

Diversity, Equity and Inclusion – We honor the unique dimensions of human identity and promote a culture of fairness where everyone is welcomed, respected and encouraged to participate fully.

Prevention – We look for ways to reduce the risks of safeguarding violations and harm to program participants, members of the communities in which we work, our staff, representatives and partners.

Reporting – We ensure transparent reporting processes for concerns to be raised and they are accessible and made known to everyone we work with and serve.

Response – We take steps to prevent further harm, investigate complaints confidentially in a timely manner and take appropriate actions to address any substantiated allegations of misconduct and any consequences stemming from the misconduct.



Do No Harm – We are open to the critical assessment of our policies and program implementation and committed to preventing and mitigating unintended negative consequences.

By applying these principles, Global Communities ensures that:

- All program participants, members of the communities in which we work and staff have equal rights to protection from the risk of harm or abuse.
- Staff, representatives and partners understand their responsibility to prevent the risk of harm to each other, program participants and members of the communities in which we serve.
- A duty of responsibility is applied to those with whom the organization works or is in contact with through our operations.
- Partner organizations are supported to comply with safeguarding policies and assisted in adapting and/or adopting our policies.
- All safeguarding actions are taken with the best interests of children and adults at risk.

5. Policy

5.1 Global Communities is committed to the safeguarding and well-being of all program participants, staff, representatives, partners and anyone with whom Global Communities interacts worldwide, regardless of age, sex, gender identity, disability, sexual orientation or ethnic origin. Global Communities prohibits its staff, partners or any other individuals associated with the delivery of its work from engaging in or being subjected to, any form of sexual exploitation, abuse, harassment or discrimination. All representatives of Global Communities have

a duty to report any suspected breach of our safeguarding policy.

This policy addresses the following areas of safeguarding: protection against sexual exploitation, abuse and harassment, child safeguarding, anti-trafficking and sexual harassment bullying and discrimination in the workplace. These key areas of safeguarding may have different policies and procedures associated with them (see Associated Policies and Procedures referenced below).

Global Communities will implement Safeguarding Minimum Standards (SMS) as required actions to support the operationalization of safeguarding and to address safeguarding across all departments.

5.2 Prevention

Global Communities responsibilities:

- Ensure all staff have access to, are familiar with and know their responsibilities under this policy.
- Design and undertake programs and activities to protect people from the risk of harm that may arise from their coming into contact with Global Communities, including the way information about individuals in our programs is gathered and communicated.
- Ensure safeguarding activities are included in new project proposal narratives and budgets based on the country and program risk level.
- Implement safeguarding procedures when recruiting, managing and deploying all staff, including mandatory safeguarding training within 30 days of start date.

- Ensure all partner, contractor, supplier and vendor agreements that interact with program participants include a safeguarding clause specific to preventing sexual exploitation, abuse and harassment.
- Ensure that program participants give informed consent before using their information for stories, photos or online engagement.
- Ensure all staff receives annual safeguarding training.
- Ensure that all staff, partners, program participants and members of communities have access to mechanisms for reporting safeguarding concerns or allegations of abuse.
- Follow up on reports of safeguarding concerns promptly, according to due process and survivor-focused best practices.
- Ensure the provision of support services to survivors of sexual exploitation and abuse caused by staff or individuals associated with Global Communities.

Managers' responsibilities

- Ensure the dissemination of this policy and promote its relevance in all aspects of their work.
- Hold themselves and others accountable and help create a safe environment for all.



- Support systems that maintain an environment in which staff, program participants, partners, contractors, suppliers, vendors, and other representatives know how Global Communities expects them to behave and will respond should they fail to meet those expectations as well as how they can report their concerns.
- Ensure that Global Communities staff are updated on our safeguarding policy and are familiar with our procedures for incident reporting.

All Staff responsibilities: Additional requirements will be shared with staff according to their role at Global Communities.

Safeguarding Children (anyone under the age of 18)

Global Communities staff and associated personnel are prohibited from:

- Engaging in sexual activity with children (anyone under the age of 18¹) regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defense.
- Sexually abusing or exploiting children.
- Subjecting a child to physical, emotional or psychological abuse or neglect.
- Engaging in any commercially exploitative activities with children, including child labor.
- Communicating with children via social media, text or other channels unless it is an agreed part of your work and managers

are both informed and able to monitor activity.

- Using inappropriate language or behavior when dealing with children.
- Engaging in human trafficking.
- Exposing children to pornography.
- Engaging in online grooming or consuming, purchasing or distributing child pornography.
- Abusing their power to obtain favors from children.
- Recruiting or employing anyone below the national legislated minimum working age.²
- Using children’s pictures and information in a way that could put them at risk.
- Publishing pictures or stories of children without the written consent of their parents or guardians, using Global Communities Photo Use Policy and Media Consent form.
- Taking pictures of undressed children.
- Working with vendors who employ child labor.

Global Communities staff and associated personnel must:

- Treat children with respect always.
- Interact with children showing trust and respect, valuing their views and taking them seriously.



¹UN convention on the Rights of the Child.

²UN convention on the Rights of the Child, ILO conventions nos. 138, 182 and 79, ILO recommendation no. 146

- Ensure that two more staff members or adults are always present at Global Communities activities for children and young people.
- Ensure appropriate supervision and support to ensure children are always safe.
- Promote the implementation of the Safeguarding Policy and help to create and maintain an environment that prevents safeguarding violations.
- Report any concerns or suspicions regarding safeguarding violations by Global Communities staff members or associated personnel.

Protection from Sexual Exploitation, Abuse and Harassment (PSEAH)

Global Communities staff and individuals associated with Global Communities are prohibited from:

- Sexually abusing or exploiting adults, including engaging in human trafficking.
- Subjecting an adult at risk to physical, emotional or psychological abuse or neglect.
- Engaging in any form of forced or unwanted sexual activity. Sexual abuse includes using physical force, making threats or taking advantage of a person unable to give consent. Sexual abuse also includes unwanted sexual attention that does not involve physical contact, such as sexualized comments and gestures or unwanted exposure to pornography.
- Communicating with participants online or through other channels unless it is an agreed part of your work and managers are both informed and able to monitor activity.



- Taking advantage of an imbalance of power to manipulate or coerce another person to engage in sexual activity for the financial, sexual or political benefit of the abuser. This includes sexual exploitation in person, online or a combination of both.
- Exchanging money for sexual activity. This includes paying for sex even in countries where prostitution is legal.
- Exchanging employment, goods or services for sexual activity.
- Engaging in any sexual relationship with a program participant that involves improper use of rank or position since they are based inherently on unequal power dynamics, as determined by Global Communities.

Global Communities staff and associated personnel must:

- Treat everyone, especially adults at risk, with respect always, noting that some people may experience increased vulnerability, including women, refugees, internally displaced people, LGBTQ+ people, people with disabilities, people who are homeless, people who sell sex, people who are incarcerated, other marginalized people.

- Work with adults at risk with mutual trust and respect, value and take their views seriously.
- Be aware of situations that may present risks and manage these risks.
- Promote the implementation of the Safeguarding Policy and help to create and maintain an environment that prevents safeguarding violations.
- Report any concerns or suspicions regarding safeguarding violations by Global Communities staff members or associated personnel.
- Balance the need to respect societal norms of the communities with the responsibility to report abusive cultural practices.
- Work in partnership with colleagues and other agencies to promote and safeguard people's welfare in everything we do.
- Develop and keep clear personal boundaries and rules when conducting activities with participants and communities to keep them and those conducting activities safe.
- Ensure confidential information concerning participants and communities is not shared inappropriately on social media or with others, except through formal safeguarding reporting processes.
- Empower adults at risk to make their own decisions and to give informed consent when connecting with Global Communities and contributing to our work.
- Prioritize the dignity, safety and well-being of the individual.
- Prioritize actions to protect and be inclusive of children and adults at risk and prioritize actions that prevent harm from occurring.
- See Safeguarding Child and Adult at Risk Policy and Prevention of Sexual Exploitation, Abuse and Harassment Policy for additional information in accordance with the IASC Six Core Principles Relating to Sexual Exploitation³ and Abuse.

Protection Against Sexual Harassment in the Workplace

Global Communities staff and individuals associated with Global Communities must not:

Subject a fellow employee, including volunteers, interns, contractors or board members, to unsolicited and unwelcome sexual advances, requests for sexual acts or favors or other physical, verbal, electronic conduct or visual displays of a sexual nature when submission to such conduct is made either explicitly or implicitly including:

- Making inappropriate jokes or comments with sexual connotations.
- Leering or using sexually suggestive hand or body gestures.
- Making comments and/or questioning another person's sexual conduct and/or private relationships.
- Making persistent and/or unwelcome advances, propositions and/or requests for dates.
- Making inappropriate written communications via phone, text, email or

³ [IASC Six Core Principles Relating to Sexual Exploitation and Abuse, 2019](#)

other computer system messages or social media channels.

- Having unnecessary close physical proximity, including persistently following a person or blocking movements.
- Offering employment benefits in exchange for sexual favors.
- Making or threatening reprisals after a negative response to sexual advances.
- Making denigrating comments regarding a person's gender or sexual orientation.
- intimidating or excluding a person because of their sex or gender identity.
- See the Anti-Sexual Harassment Policy for additional information.

Global Communities staff and associated personnel must:

- Support and maintain policies and processes that always promote a safe and supportive work environment.
- Promote a "speak-up" culture in which individuals are encouraged to set boundaries and communicate when words or actions make them feel uncomfortable, raise concern and report unacceptable behavior.



5.3 Reporting

Country offices are responsible for ensuring that program participants and members of the communities in which we work have safe, appropriate and accessible means of reporting safeguarding concerns through locally established community-based reporting mechanisms. Community-Based Feedback Mechanism (FBM) guidelines are available for additional information and development support.

Staff, representatives and partners may make reports of any safeguarding violations through the Internal Reporting Process. Reports should adhere to the principles of do no harm and confidentiality to the extent possible.



Internal Reporting Process

Staff members with a complaint or concern relating to safeguarding must report it immediately through any of the following channels:

- Designated Safeguarding Focal Point (if one has been appointed)
- The Country Director or Chief of Party
- Senior Manager
- Safeguarding Director
safeguarding@globalcommunities.org
- People and Culture office
- Global Communities' anonymous reporting service:
www.lighthouse-services.com/globalcommunities

Senior management and People & Culture staff in all Global Communities offices must notify the Safeguarding Director within 24 hours of occurrence or upon learning of a violation. The report should include the following:

- Date, time and location of the incident.
- Nature of what happened.
- Any immediate help or actions required.

Any staff reporting concerns or complaints will be protected by Global Communities No Retaliation Policy.

To enhance transparency and accountability, safeguarding incidents are aggregated and reported to the Board with no identifiable information and external commitments are enforced, including as specified by donors, to share incident reports. Safeguarding violations are also reported through the Global Misconduct Disclosure Scheme to prevent perpetrators of sexual misconduct from moving between organizations. All reports are confidential and accessible by the Safeguarding Director and those involved in the specific investigations.

Internal and external safeguarding reports may come through multiple sources, including community-based reporting mechanisms, Lighthouse, email and in-person. The Safeguarding, Ethics and People & Culture offices regularly meet to triage and ensure a confidential and coordinated effort to manage and investigate all reports that may come into any of these offices.

5.4 Response

The Safeguarding Director will work with internal stakeholders such as Ethics and People & Culture to conduct timely investigations of complaints and determine the appropriate response using a survivor-centered approach.

Intake: Reports are confidential to protect the survivor and all involved. An initial inquiry and risk assessment is conducted to ensure the well-being and safety of all involved parties and that we do no harm in investigating.

Investigate: Any reported violation will be followed by a timely, thorough and discreet

investigation, which may include interviews with the parties involved and individuals who may have observed the alleged conduct or who have relevant knowledge. Global Communities ensures that the confidentiality and agency of the survivor takes precedence; relevant details are shared only on a need-to-know basis amongst people directly involved in the investigation.

Adjudication: If the investigation determines that a policy violation has occurred, Global Communities will take immediate and appropriate disciplinary measures against staff found in breach of the safeguarding policy, up to and including termination of employment.

If it is determined that no policy violation has occurred, safeguarding mitigation efforts, including additional staff training, program risk assessments and program adjustments may still be applied as determined by Safeguarding Director.

Global Communities will make referrals to local service providers and offer additional ongoing support to survivors of harm caused by staff or individuals associated with Global Communities. Decisions regarding support will be survivor-led.

5.5 Confidentiality

We commit to restricting access to and dissemination of information to only those with a need to know. Confidentiality helps create an environment in which witnesses are willing to share their versions of events and builds trust in the system and the organization.

6. Associated Policies and Procedures

- [Standards of Conduct](#)
- [Child Safeguarding](#)
- [Safeguarding Children and Adults at Risk Behavioral Standards](#)

- [Prevention of Sexual Exploitation, Abuse and Harassment \(PSEAH\)](#)
- [Anti-Sexual Harassment](#)
- [Anti-Discrimination, Harassment and Bullying](#)
- [Anti-Trafficking](#)
- [No Retaliation](#)
- [Fraternization & Consensual Relationship](#)
- [Safe Recruitment and Selection Procedure](#)
- [Photo Use Policy](#)
- Other policies as appropriate

7. Glossary of Terms

Abuse, Exploitation and Neglect

All forms of actions or inactions resulting in harm (or risk of harm), injury or death of program participants or community members with whom we come in contact, particularly children or adults at risk, by another in a position of responsibility, trust, authority or power. There are seven (7) key recognized sub-types of abuse:

1. Abuse of Power

When a person misuses their authority to harm someone in a position of vulnerability or someone who reports to them for personal interest or gain. Abuse of power can be in the form of, but not limited to, sexual exploitation, abuse, harassment and workplace bullying.

2. Physical Abuse

Actual or potential physical harm from an interaction or lack of interaction. There may be single or repeated incidents. Examples include smacking, hitting, shaking, poisoning, burning, drowning or suffocating or deliberately making an individual ill.

3. Sexual Abuse

Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. Sexual abuse

in this policy covers all forms of sexual threat, assault, violence, rape and molestation without physical harm or penetration, sexually explicit pictures or videos; being forced to share sexually explicit photographs or videos through technology or other means; being made to do something sexual to someone that may feel uncomfortable or wrong. Perpetrators may sexually groom children or adults at risk by enlisting caregivers' trust to enable easy access to the child or adult at risk.

4. Emotional Abuse

The failure to provide an appropriate, supportive environment in which a stable and full range of emotional and social competencies can be developed. Emotional abuse may include restriction of movement, patterns of belittling, denigrating, scapegoating, threatening, scaring, discriminating, ridiculing or other non-physical forms of hostile or rejecting treatment.

5. Exploitation

Using survivors or victims to work or perform activities for the benefit of others where the perpetrator profits monetarily, socially, politically or in other ways where there is an exchange of gifts, cash or in kind. This includes, but is not limited to, child labor, forced recruitment into armed groups, prostitution, trafficking and pornography. These activities risk the physical or mental health, education (e.g., deprivation of schooling or combining school with long hours at work, in the case of children), moral or social-emotional development (e.g., early or forced marriage).

6. Neglect or Negligent Treatment

The inattention or omission on the caregiver's part to provide for the development of the child or adult at risk in all spheres, such as health, education, emotional development, nutrition, shelter and safe living conditions.

This includes failing to properly protect children and adults at risk from harm as much as feasible.

7. *Traditional Harmful Practices*

Practices based on cultural beliefs and values that have harmful consequences to survivors or victims, including such practices as early or forced marriage and genital mutilation.

Adult at Risk

An individual 18 and older who identifies as unable to take care of or protect themselves from harm or exploitation; or who, due to gender, mental or physical health, disability, ethnicity, religious identity, sexual orientation, economic or social status or resulting from disaster or conflict, is deemed to be at risk.

Bullying

Persistent and repeated mistreatment of a targeted person(s) by one or more perpetrators. Includes (but is not limited to) threats, intimidation, public humiliation/name-calling, persistent and unwelcome teasing, stalking or intentional work interference/sabotage that creates a risk to health and safety.

Child

Any person under the age of 18, in accordance with Article 1 of the UN Convention on the Rights of the Child, 1989.

Child Labor

Work that deprives children of their childhood, their potential and their dignity and that is harmful to physical and mental development. It refers to work that is mentally, physically, socially or morally dangerous and harmful to children; and/or interferes with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely or requiring them to attempt to combine school attendance with

excessively long and heavy work. It also includes the worst form of child labor⁴ including:

- All forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labor, including forced or compulsory recruitment of children for use in armed conflict.
- The use, procuring or offering of a child for prostitution, to produce pornography or for pornographic performances.
- The use, procuring or offering of a child for illicit activities, for the production and trafficking of drugs as defined in the relevant international treaties.
- Work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children, also known as “hazardous work.”

Consent

Agreement to sexual acts, freely given without any element of force, fraud, deceit or coercion—whether physical, emotional, economic or social. The two necessary components of consent are that it be both informed and voluntary, meaning involved persons fully understand the sexual act to which the agreement of “yes” is made without any use of influence, force or coercion. Children, anyone under 18 years of age, can never give consent to a sexual relationship with an adult.

Discrimination

Unfair or abusive treatment based on protected characteristics such as race, age, color, creed, gender, gender identity, religion, national origin, genetic information, religious beliefs, sexual orientation, marital status, pregnancy, disability, protected veteran status or any other

⁴ Article 3 of ILO Convention No. 182

characteristic protected by law in all terms, conditions and privileges of employment, including without limitation, recruiting, hiring, assignment, compensation, promotion, discipline and termination.

Do No Harm

The Do No Harm approach challenges aid agency staff to take responsibility for the ways that their assistance affects conflicts and calls for a redesign of assistance programs so that they do not harm while doing their intended good.⁵

Harassment

A form of discrimination that can occur in the workplace. Harassment is defined as offensive verbal or physical conduct meant to intimidate or offend *and is based on a protected characteristic*. See Discrimination above for protected characteristics.

Human Trafficking

Human trafficking, also known as trafficking in persons, involves the use of force, fraud, or coercion to obtain some type of labor or commercial sex act. The coercion can be subtle or overt, physical or psychological. The exploitation of a minor for commercial sex is human trafficking, regardless of whether any form of force, fraud, or coercion was used.

Informed Consent

The voluntary agreement of an individual, who has the capacity, to give approval to pursue a legal

procedure or receive services. To be capable of providing informed consent, the individual must have the capacity and maturity to know about and understand the implications of the procedures to be followed and the services being offered.

Partner

National or international agencies or organizations that deliver programs or activities that are funded or supported by Global Communities. This term includes employees of, or entities engaged by, Partners.

Program Participant

Any individual who is receiving services, directly or indirectly, from Global Communities. Note that misuse of power can also apply to the wider community that Global Communities serves and can include exploitation by giving the perception of being in a position of power.

Protection from Sexual Exploitation and Abuse (PSEA)⁶

The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by staff or individuals associated with Global Communities. The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13).

Reporting Mechanism or Procedure

Processes that allow individuals to report concerns such as violations of organizational policies or standards of behavior. Elements of a complaints mechanism may include suggestion boxes, whistleblowing policies and designated Safeguarding Focal Points.

Representative

Consultants, visitors, media and journalists, third-party contractors, including vendors and anyone who derives a direct or indirect benefit from Global Communities.

⁵ Anderson, Mary 1999.

⁶ UN Secretary General's Bulletin on Special Measures for PSEA. ST/SGB/2003/13

Safeguarding

The responsibility that all organizations must ensure that their culture, programs and practices respect the rights and dignity of the people with whom the organization comes in contact—especially children and adults at risk—to live free from abuse and harm.

Safeguarding Focal Point

Safeguarding Focal Point(s) are located at the headquarters and field office level. They are responsible for providing safeguarding training and supporting community awareness campaigns at the field office level. They support the implementation of policy and activities, as well as regularly report to the Safeguarding Director on PSEAH activities. Safeguarding Focal Points may also be identified to receive reports of employee misconduct and take statements from complainants.

Sexual Abuse

The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual Exploitation⁷

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.

Sexual Harassment

Unsolicited and unwelcome sexual advances or physical, verbal, electronic conduct or visual displays of a sexual nature toward a program participant, community member, staff, representative or partner. It may also include requests for sexual acts or favors when submission to such conduct is made either explicitly or implicitly.

Survivor or Victim

The person who is, or has been, sexually exploited, abused, harassed or experienced other harm perpetrated by an individual associated with Global Communities, Partner or Staff. “Survivor” is generally preferred in the psychological and social support sectors because it implies resilience. “Victim” is a term often used in the legal and medical sectors. This document primarily uses the term “survivor” except in the case of children where the term “victim” will always be used.

Survivor-Centered Approach

Based on a set of principles designed to guide professionals—regardless of their role—in their engagement with survivors or victims who have experienced sexual exploitation, abuse or harassment. The survivor-centered approach aims to create a supportive environment in which the survivor’s rights are respected, is treated with dignity and respect and has access to necessary services.

⁷ United Nations Glossary on Sexual Exploitation and Abuse, 24 July 2017.

Safeguarding Policy Acknowledgment Form

I have read and understood Global Communities Safeguarding Policy and agree to abide by the requirements as set forth in this policy.

Signature: _____

Date: _____

Name (Printed): _____