



INTERNATIONAL SAFEGUARDING POLICY

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This policy has been approved by Action Against Hunger’s International Executive Committee as a Global Network Policy that applies to all Action Against Hunger entities which have signed up to the International Trade Mark Licensing Agreement, the International Protocols and the International Charter of Principles including its headquarters, regional offices, country offices and their branches and subsidiaries (the “Action Against Hunger Network”).²

The responsibility for the drafting and updating of this policy lies with the International Human Resources Directors, approved by the International Executive Committee, and will be reviewed on an annual basis, though may be updated on an "as needs basis" should revisions be required.

INTRODUCTION

Action Against Hunger has led the global fight against hunger for nearly 40 years in over 50 countries, saving the lives of children and working with communities before and after disasters to enable people to provide for themselves, see their children grow up strong and build prosperous communities. Working with communities in such humanitarian contexts, we recognize that our programs and operations put our teams in contact with children and vulnerable adults who may be particularly at risk of harm or abuse.

This Policy sets out Action Against Hunger’s commitment to protect all persons we come into contact with through our work, including children and At-Risk adults. Action Against Hunger has ZERO TOLERANCE towards all forms of harm and abuse. We take concerns and complaints relating to Safeguarding issues involving our Staff, Associated Personnel, Partners and Suppliers very seriously and will take action to vigorously investigate and manage any violations or alleged violations of this Policy.

PURPOSE

The purpose of this Policy is to:

- Outline the range of measures Action Against Hunger has put in place to protect anyone we come into contact with through our work, in particular children and vulnerable adults, from harm (including harm arising from the conduct of Staff, Associated Personnel, Partners and Suppliers or from the design and implementation of our programs and activities);

¹ Audit, Risk and Compliance Unit in ACF France

² At the date of adoption of this policy, this includes UK, US, Canada, France, Spain, India - & any other separate legal entities across the network and any of their country offices, branches, subsidiaries and local offices.

- Ensure that our Staff, Associated Personnel, Partners and Supplier know and understand Action Against Hunger's commitment to Safeguarding and that they are skilled and confident in meeting their responsibilities under this Policy;
- Embed processes and procedures across the Action Against Hunger Network to prevent, manage and report Safeguarding concerns in order to meet our commitments to our program participants, donors, regulators and other stakeholders;
- Make sure that people we come into contact with through our work are informed and aware of our Safeguarding commitments and know and understand how they can report any Safeguarding concerns relating to our work, staff, Associated Personnel, Partners or Suppliers.

This policy does not cover:

- Sexual harassment in the workplace – this is dealt with under Action Against Hunger's Workplace Violence and Harassment Policies³
- Safeguarding concerns in the wider community not perpetrated by Action Against Hunger or Associated Personnel

WHAT IS SAFEGUARDING?

At Action Against Hunger, Safeguarding applies to the range of measures we put in place to protect the people we come into contact with through our programs, operations and presence in communities in which we work; protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect.

Action Against Hunger is fully committed to responsible Safeguarding practice and takes seriously our obligation to ensure we, as an organization, and anyone who represents us, do not in any way harm, abuse or commit any other act that may place persons at risk. We further commit that all who work with or engage with our agency understand and are supported to meet their Safeguarding roles and responsibilities. Further, Action Against Hunger will take appropriate measures to prevent anyone from taking advantage of their association with our organization to perpetrate abuse, exploitation or harm.

SCOPE

As an international policy, this Safeguarding Policy applies to:

- All staff contracted by Action Against Hunger, regardless of international or national contractual status
- Associated Personnel while engaged with work or visits related to Action Against Hunger i.e.: consultants; interns; volunteers; Board Members, organizational ambassadors, Trustees, program visitors including journalists, celebrities and politicians
- Partners and Suppliers that Action Against Hunger engages with. Partners are those organizations or institutions that we hold strategic, technical or implementation relationships with. Suppliers provide Action Against Hunger with a service in exchange for payment.

Action Against Hunger shall ensure that any external parties with whom it enters into a partnership, contract or grant agreement with, or any organisations that we work with in delivering our programs, and all of their staff and associated personnel, will be required to comply with this policy or demonstrate that they have equivalent or higher Safeguarding policies and procedures in place.

³While some NGOs include workplace bullying and harassment in their Safeguarding policy, this is covered by Action Against Hunger's relevant HQ-specific procedures for dealing with workplace bullying and harassment, as legal and statutory differences in handling workplace incidents may vary.

Action Against Hunger respects the belief and value systems by which staff, associated personnel, partners and suppliers conduct their personal lives. However, actions taken by them out of working hours that are seen to contradict this policy will be considered a violation of the policy.

POLICY STATEMENT

Action Against Hunger believes that everyone we come into contact with, regardless of age, gender identity, disability, sexual orientation or ethnic origin, has the right to be protected from all forms of harm, abuse, neglect and exploitation. Action Against Hunger will not tolerate abuse and exploitation by staff, Associated Personnel, Partners or Suppliers.

This policy will address the measures we put in place to protect our program participants including, but not limited to Children and At-Risk Adults whom we come into contact with through the delivery of our programs. Action Against Hunger has put in place specific measures in relation to Child Safeguarding and Protection from Sexual Exploitation and Abuse (PSEA), attached as Annexes.

Additionally, this Safeguarding Policy applies to all forms of organised abuses of power, including Forced Labour, Modern Slavery and Trafficking in Persons. Action Against Hunger condemns these forms of exploitation and applies its ZERO TOLERANCE policy towards staff, Associated Personnel, Partners and Suppliers who exploit human beings for their benefit. These principles are embedded in the Action Against Hunger Code of Conduct, and compliance guidelines /plans on Trafficking in Persons (TIP) and Modern Slavery (see Associated Policies). Trafficking in Persons and modern-day slavery affects 21 million people worldwide, particularly vulnerable populations with whom Action Against Hunger works including refugees, displaced persons, migrants, and women and children living in poverty. As part of our Safeguarding commitments, Action Against Hunger has a responsibility to protect our program participants and assisted communities from forced labor, slavery or human trafficking, ensuring that no one is harmed as a result of their engagement with Action Against Hunger's programs and operations in any form.

Action Against Hunger commits to systematically addressing Safeguarding in its programs and operations through five thematic pillars: information, prevention, reporting, implementation, and monitoring & learning.

INFORMATION: Ensuring that all staff, Associated Personnel, Partners and Suppliers are aware of our Safeguarding Policy and undergo mandatory training.

PREVENTION: Ensuring, through awareness, programming and personal and professional conduct, that our staff, Associated Personnel, Partners and Suppliers minimize potential and actual risk and Do No Harm.

REPORTING: Ensuring that staff, Associated Personnel, Partners, Suppliers and affected communities and others are clear what steps to take where concerns arise regarding breaches of this Safeguarding Policy.

IMPLEMENTATION: Ensuring that action, including investigations, is taken where concerns arise regarding possible breaches of our Safeguarding Policy and Code of Conduct.

MONITORING & LEARNING: Ensuring consistent, systematic review of the learnings from Safeguarding reports and complaints received in order to continuously improve our systems.

ACTION AGAINST HUNGER Responsibilities

Action Against Hunger commits to fulfilling its Safeguarding commitments through the development of comprehensive information, establishment of prevention and reporting measures, implementation of consistent procedures, and rigorous monitoring of this policy to include time-bound, measurable indicators of progress that will enable continual learning and improvement.

Action Against Hunger will:

- Undertake risk assessments to identify areas of risks and document steps that are being taken to remove or reduce these risks,.

- Ensure Safeguarding standards are included in relevant codes of conduct and in induction materials and training courses for staff, Associated Personnel, Partners or Suppliers.
- Require mandatory training on Safeguarding and PSEA for all staff, Associated Personnel during on boarding with refresher trainings provided on an annual basis thereafter.
- Ensure all staff have access to, are familiar with, and know their responsibilities within this policy.
- Design and undertake all its programs and activities in a way that protects people from any risk of harm that may arise from their coming into contact with Action Against Hunger.
- Regularly report to relevant stakeholders as appropriate measures taken to prevent and respond to sexual exploitation and abuse and child mistreatment. Such information will include details on complaint mechanisms, the status and outcome of investigations in general terms, feedback on actions taken against perpetrators, and follow-up measures taken as well as assistance available to complainants and survivors.
- Engage in inter agency coordinated efforts on Safeguarding and elicit the support of communities and governments to prevent and respond to sexual exploitation and abuse and child mistreatment by Action Against Hunger staff, Associated Personnel, Partners or Suppliers
- Ensure that complaint mechanisms for reporting Safeguarding concerns are accessible and that all staff understand their responsibilities for receiving complaints and how to discharge their duties. This includes ensuring documented reporting procedures are available in a relevant local languages and clear communication is provided about the policy for non-compliance, including potential sanctions for breaches.
- Provide support and assistance to complainants of sexual exploitation and abuse or child abuse, which may include medical treatment, legal assistance and psychosocial support as appropriate and feasible, according to the needs of the survivor, taking account of confidentiality, cultural sensitivities and survivor safety.
- Ensure allegations of sexual exploitation and abuse and child mistreatment are investigated in a timely and professional manner. When necessary Action Against Hunger will engage professional investigators or secure investigative expertise as appropriate.
- Take swift and appropriate action, including legal action if applicable, against staff, Associated Personnel, Partners or Suppliers who commit breaches of the Safeguarding Policy. This may include administrative or disciplinary action, and/or referral to the relevant authorities for appropriate action. This will also include taking the appropriate action to protect persons from retaliation where allegations of sexual exploitation and abuse or child mistreatment are reported.

Staff, Associated Personnel, Partners and Suppliers Responsibilities

Action Against Hunger staff, Associated Personnel, Partners and Suppliers are obliged to uphold and promote the highest standards of ethical and professional conduct at all times. This Safeguarding policy articulates the minimum standards of conduct in order to minimize risk and protect our program participants and communities from sexual exploitation and abuse and child mistreatment as a result of engagement with our organization.

Action Against Hunger acknowledges that the nature of our work often puts our staff, Associated Personnel, Partners and Suppliers in positions of power in relation to the communities with whom we work, especially particularly At-Risk adults and children. Action Against Hunger commits to ensuring all staff do not abuse this imbalance of power and influence over the lives and well-being of our program participants or others in the communities where we work.

Action Against Hunger staff and Associated Personnel are obliged to:

- Comply with this Safeguarding Policy and the relevant associated policies which fall under its scope, including those referred to in the section below
- Participate in mandatory Safeguarding and PSEA trainings during induction processes and on an annual basis thereafter.

- Contribute to creating and maintaining an environment that prevents Safeguarding violations and promotes the implementation of the Safeguarding Policy.
- Report any concerns or suspicions regarding safeguarding violations by an Action Against Hunger staff member or Associated Personnel according to the appropriate channels and in line with established procedures.
- Conduct themselves according to the highest standards of humanitarian professionalism, ensuring that Action Against Hunger programs and operations facilitate an environment where our program participants and communities feel safe, respected and supported.

Action Against Hunger Partners and Suppliers are obliged to:

- Comply with this Safeguarding Policy and the relevant associated policies which fall under its scope, including those referred to in the section below OR demonstrate that they have their own policies and procedures that meet equivalent or higher standards.

Action Against Hunger will take reasonable steps to ensure that Partners and Suppliers comply with this Safeguarding Policy. The Partners and Suppliers Assessment Tool provides guidance for assessing the level of risk of partners with regards to Safeguarding commitments and Prevention of Sexual Exploitation and Abuse (PSEA) standards and the mitigating actions Action Against Hunger should take.

Child Safeguarding

Action Against Hunger staff, Associated Personnel, Partners and Suppliers must not:

- Engage in sexual activity with anyone under the age of 18
- Sexually abuse or exploit children
- Subject a child to physical, emotional or psychological mistreatment, or neglect
- Engage in any commercially exploitative activities with children including child labor or trafficking

Action Against Hunger will not tolerate sexual activity with persons under the age of 18, regardless of the age of majority or age of consent locally. Mistaken belief in the age of the child will not constitute a defense or be considered a justifiable excuse.

At- Risk Adult Safeguarding

Action Against Hunger defines At- Risk adults as:

- those aged over 18 years and who are identified as unable to take care of themselves/ protect themselves from harm or exploitation; or
- those who, due to their gender, mental or physical health, disability, ethnicity, religious identity, sexual orientation, economic or social status, or as a result of disaster and/or conflict, are deemed to be at particularly heightened risk.

A Vulnerable Adult or Adult at Risk is defined as someone “who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation”. This can include people experiencing certain conditions (for instance physical or mental disability or illness) or certain types of vulnerability (for instance domestic abuse or displacement from their homes)

Action Against Hunger staff, Associated Personnel, Partners and Suppliers must not:

- Sexually abuse or exploit At-Risk adults
- Subject an At-Risk adult to physical, emotional or psychological abuse, or neglect

Protection from Sexual Exploitation and Abuse (PSEA)

Action Against Hunger is committed to the six core Principles of the Inter Agency Standing Committee IASC. Sexual exploitation and abuse by employees and Associated Personnel constitutes an act of gross misconduct and are therefore grounds for termination of employment, service contract, partnership or other agreement.

Action Against Hunger confirms its commitment to ensure that all staff, Associated Personnel, Partners and Supplier comply with the following core principles:

- Staff must not engage in sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defense.
- Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited. This includes exchange of assistance that is due to beneficiaries.
- Any sexual relationship between employees and a person benefitting from such humanitarian assistance and protection that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of our work.
- Where an employee develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, he or she must report such concerns via established agency reporting mechanisms.
- Staff are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of their code of conduct. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.

Board of Directors / Executive Directors / Chief Executive Officers (CEO) are accountable for this Policy and its implementation, and are responsible for the application of this Policy within their own organizational entity and where they are the Managing Headquarter for a country office or region. They commit to supporting its implementation by:

- Creating a positive organizational culture to support a Safeguarding environment
- Engaging with senior management to ensure that Safeguarding is embedded and regularly considered within programs, operations and risk registers
- Monitor progress, review and update the Policies annually ensuring lessons learned from implementation are considered in future operations
- Ensure that sufficient resources are made available to support the effective implementation of the relevant Safeguarding policies
- Protect the credibility and reputation of Action Against Hunger through effective oversight of this Policy and its implementation
- Serve as role models for standards of conduct and behaviour as outlined in this Policy

Managers and Senior Leadership have additional obligations regarding this policy, including:

- Ensuring that our program participants and communities are made aware of this policy and the Safeguarding systems in place contextualized for language, cultural and literal considerations, with the confidence and trust in the organization to report any incidents or concerns they may have about our staff, associate personnel or programs.
- Ensure that all staff, Associated Personnel, Partners and Suppliers understand this Safeguarding policy and their obligations when engaging with Action Against Hunger including provision of mandatory trainings.
- Support and facilitate the development of mechanisms to operationalize this policy, particularly in relation to contextualizing these standards to country specific realities and necessities.
- Be held ultimately accountable for ensuring the policy is fully considered and applied in their relevant areas of responsibility.

Human Resource Managers will also be responsible for ensuring procedures are in place and implemented with regards to robust recruitment, induction and training. Senior Managers and Line Supervisors will be

held responsible for ensuring Safeguarding is consistently considered and assessed in performance management processes.

Country Directors, are responsible to ensure that all staff and Associated Personnel in their country office are trained and understand this policy. With support from relevant Headquarter senior management, Country Directors will ensure that complaints handling and investigation procedures are enacted, along with appropriate employee disciplinary procedures as necessary. Country Directors will also be responsible for ensuring the provision of appropriate survivor assistance is consistently prioritized.

REPORTING

Action Against Hunger will ensure that safe, appropriate, accessible means of reporting Safeguarding concerns are made available to staff, Associated Personnel, Partners and Suppliers and the communities with whom we work. Complaints and reporting mechanisms will be developed in consultation with communities to ensure appropriate, relevant, safe and confidential means of channeling Safeguarding concerns are in place. These mechanisms will include methods for escalating reports through the appropriate channels within the organization, as well as include guidance on referral to appropriate authorities as necessary.

Action Against Hunger is committed to handling complaints, originating both internally and externally, in a clearly defined, effective and expeditious manner that:

- Treats program participants, staff and other stakeholders with respect by acknowledging their right to complain and have a complaint handled professionally
- Actively solicits and acts on stakeholder feedback
- Acknowledges that a complaint received gives Action Against Hunger the opportunity to maintain confidence in our work as well as enhancing relationships within and outside the organization.
- Improves the quality of our work, enhance the trust and confidence of our stakeholders, identify areas of our work which need to be improved and ensure that Action Against Hunger learns from the feedback provided through this process.
- Enforces Data Protection requirements in order to ensure processes respect the identity of their users and fulfills relevant Data Protection policy compliance

Action Against Hunger is committed to assurance of confidentiality, professionalism and non-retaliation, particularly for complaints relating to sexual exploitation and abuse or child abuse, given the social stigma associated with this and the very real danger that women or children reporting such abuse could face from perpetrators, and from their own families and communities.

All Safeguarding reports will be taken seriously whether submitted from a named source or anonymously. A core principle of Action Against Hunger's reporting mechanism is that it can accommodate complaints lodged anonymously, particularly when a complainant may have concerns about their safety and security. While an anonymous complaint may be more difficult to investigate and verify, Action Against Hunger will make every concerted effort to ensure it follows standard recommended procedures to address and action.

Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with Safeguarding concerns. Information relating to the concern and subsequent case management will be shared on a need to know basis only and will be kept secure at all times.

Action Against Hunger will follow up Safeguarding reports and concerns according to policy and procedure, and legal and statutory obligations. This will include appropriate measures to support and protect affected persons when Safeguarding concerns are reported. Organizational response to reports will take into account the wishes and interests of the complainant and affected persons and will pay particular attention to safety and protection issues related to gender, cultural sensitivities and other identity considerations.

Action Against Hunger will ensure its responses to Safeguarding reports will take care to appropriately assess associated risks and strive to ensure no further harm arises as a result of actions taken by the agency. Action Against Hunger will apply appropriate disciplinary measures to staff found in breach of this policy. This may include suspension of staff and associated personnel until such a time as a Safeguarding report has been thoroughly investigated, and/or result in termination in cases where abuse or exploitation is found to have taken place and been substantiated.

Survivor- Centered Approach

Action Against Hunger commits to adopting a survivor led approach to its Safeguarding procedures and will ensure relevant resources and services are in place or offered for providing support to complainants or survivors of harm caused by staff, Associated Personnel, Partners or Suppliers. This commitment applies regardless of whether a formal internal response is carried out (such as an internal investigation).

Decisions regarding support required will be led by the survivor. Action Against Hunger recognizes it is accountable to survivors of Safeguarding violations of its staff, Associated Personnel, Partners and Suppliers and will facilitate, as appropriate and feasible, resources and access to specialized services including medical care, legal counseling, psychosocial counselling and others as necessary. As part of this commitment Action Against Hunger will, as much as possible, coordinate with inter agency referral mechanisms and networks when available.

NOTE on Trafficking in Persons: All employees should be made aware of the Global Human Trafficking Hotline at 1-844-888-FREE and its e-mail address at help@befree.org.

MONITORING & LEARNING

Action Against Hunger will ensure consistent, systematic review of the learnings from the Safeguarding reports and complaints received. This will include a comprehensive analysis of the nature of reports received (excluding confidential information or specific identifiable data on concerned individuals), timeframes taken to address and resolve, thematic trends arising, and satisfactory closure rates. Such analysis will feed into improved programming and strengthened accountability mechanisms across the Action Against Hunger network.

Monitoring of the complaints mechanism will be consistently conducted to ensure the procedures are followed, are effective, and to recommend adjustments and improvements for continual improvement.

Action Against Hunger commits to promote network-wide learning to ensure best practice and lessons from Safeguarding reports and processes are captured, analyzed and shared. Additionally, participation and active engagement within the inter-agency sector on Safeguarding Initiatives will be prioritized in order to benefit from sector-wide advancements and innovation in Safeguarding approaches.

POLICY VIOLATIONS

Any breach of this Safeguarding Policy, whether within or outside the context of our work, in ways that contravene the principles and standards contained in this document, will result in immediate disciplinary action and any other action which may be appropriate to the circumstances. This may mean suspension or termination of employment, ending contractual relationships, possible withdrawal of funding/support, and termination of contract.

ASSOCIATED POLICIES

This policy is complementary to the set of standards of behaviour that all Action Against Hunger staff are required to adhere to in the International Code of Conduct, associated internal regulations or related policies defined by Action Against Hunger entities, Headquarters, and Country Offices. This Policy is also a commitment to Action Against Hunger's accountability to the communities with whom we work, and thus serves as an overarching operationalization framework for the following:

- International Code of Conduct
- PSEA (Protection from Sexual Exploitation and Abuse) policy (Annexed)
- Child Safeguarding policy (Annexed)
- Whistleblowing policy
- Complaints Response Mechanism Policy
- Data Protection Policy
- Trafficking in Persons (TIP) Policy
- UK Modern Slavery Act
- Gender Policy
- Good Business Practice Policy
- People Management Framework
- Risk Management Policies
- Protection Policy

GLOSSARY OF TERMS

At- Risk Adult

A person over the age of 18 years who has needs for care and support, who is experiencing, or at risk of, abuse or neglect and as a result of their care needs is unable to protect themselves.

Associated Personnel

Persons working with or on behalf of Action Against Hunger while not holding full time permanent contracts, including but not limited to consultants; interns; volunteers; Board Members, organizational ambassadors, Trustees, program visitors including journalists, celebrities and politicians.

Child/Children

A person below the age of 18.⁴

Child Safeguarding

Child Safeguarding is the responsibility that organisations have to make sure their staff, operations, and programs do no harm to children, that is that they do not expose children to the risk of harm and abuse, and that any concerns the organization has about children's safety within the communities in which they work, are reported to the appropriate authorities.

Complainant

A person who brings an allegation of SEA (sexual exploitation and abuse) in accordance with established procedures. This person may be an SEA survivor or another person who is aware of the wrongdoing.

Concern

A Safeguarding concern is a feeling or worry that a child or adult may be at risk of harm, or may have been harmed, by the organisation's staff, associates, programs or operations.

Confidentiality

Confidentiality reflects the belief that people have the right to choose to whom they will, or will not, tell their story. Maintaining confidentiality means not disclosing any information at any time to any party without the informed consent of the person concerned.

Do No Harm

⁴ As defined under the United Nations Convention on the Rights of the Child

A principle that has been used in the humanitarian sector but can equally be applied to the development field. It refers to organisations' responsibility to minimise the harm they may be doing inadvertently as a result of their organisational activities.

Focal Point

The designated person in a headquarter, region or country that holds the Safeguarding role.

Harm

Psychological, physical and any other infringement of an individual's rights.

Mandatory reporting

The responsibility for humanitarian actors who hear about and/or receive a report of sexual exploitation or abuse committed by a humanitarian actor against a member of the affected population.

Program Participant

Someone who directly receives goods or services from Action Against Hunger's program. Note that misuse of power can also apply to the wider community that the NGO serves, and also can include exploitation by giving the perception of being in a position of power.

Protection from Sexual Exploitation and Abuse (PSEA)

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 Associated Personnel⁵.

Psychological harm

Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation.

Safeguarding

Safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect. In our sector, we understand it to mean protecting people, including children and At-Risk adults, from harm that arises from coming into contact with our staff or programs. This means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially At-Risk adults and children, from that harm; and to respond appropriately when harm does occur. This definition draws from our values and principles and shapes our culture. It pays specific attention to preventing and responding to harm from any potential, actual or attempted abuse of power, trust, or vulnerability, especially for sexual purposes. Safeguarding therefore applies consistently and without exception across our programs, partners and staff. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialise. These systems will be survivor-centered, while also protecting those accused until an allegation is substantiated.

Sexual abuse

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

Sexual exploitation

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. This definition includes human trafficking and modern slavery.

⁵ United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13)

Staff

Any individual who has a labor contract with the organization and therefore receives a regular salary for work by any entity within Action against Hunger network.

Survivor

The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive, however it is the individual's choice how they wish to identify themselves.

Survivor-centred approach

Prioritizes the safety, wishes and interest of the survivor first, above all other considerations.

Trafficking in Persons

As per the Protocol to Prevent, Suppress, and Punish Trafficking in Persons, especially Women and Children, supplementing the UN Convention against Transnational Organized Crime "Trafficking in persons" shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.



ANNEX I: INTERNATIONAL PROTECTION FROM SEXUAL EXPLOITATION and ABUSE (PSEA) POLICY⁶

POLICY STATEMENT

Action Against Hunger recognises the right of people everywhere to be treated with dignity and respect and protected from sexual exploitation and abuse. We understand our work can create unequal power balances between Action Against Hunger staff and its representatives (defined below) and the communities with whom we work, especially its most vulnerable members, and we are committed to mitigating the risks associated with this.

In addition to harming people, sexual abuse and exploitation erodes integrity and damages the trust and confidence of the public, our donors, and other stakeholders and therefore our ability to achieve our vision and mission.

All staff, Associated Personnel and Representatives of Action Against Hunger must uphold and promote the highest standards of ethical and professional conduct at all times, and abide by the organization's policies, including this Policy on Protection from Sexual Exploitation and Abuse.

PURPOSE

This Policy sets out the organization's measures to prevent and, where required, respond to sexual exploitation and abuse. It outlines Action Against Hunger commitments to ensure the protection of those with whom we work, and to ensure effective actions are taken when problems occur. This Policy is to be used in conjunction with employment / labour laws, our Duty of Care and relevant criminal laws, to make decisions about how to respond to complaints and concerns raised. It also reflects our responsibility for the full implementation of international standards, principles and commitments to prevent and respond to sexual exploitation and abuse.

By providing clarity on Action Against Hunger position on these issues, we will increase awareness and build trust and confidence amongst all our stakeholders in our work to prevent sexual exploitation and abuse.

DEFINITIONS

According to the United Nations⁷, Sexual exploitation is defined as the actual or attempted abuse of a position of vulnerability, power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

Sexual abuse is defined as the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

The organization prohibits sexual exploitation and abuse by staff and its representatives and affirms its ZERO TOLERANCE approach to such cases. Sexual exploitation and abuse is gross misconduct and will

⁶ Action Against Hunger International PSEA Policy, endorsed 2018

⁷ ST/SGB/2003/13: UN Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse

result in summary dismissal of staff, in accordance with disciplinary procedures and applicable laws in a given country where Action Against Hunger operates and/or has staff located. It will also result in the termination of any contracts governing relationships with other representatives.²

Action Against Hunger reserves the right to refer cases of sexual exploitation and abuse to the relevant authorities for appropriate action, including criminal prosecution where applicable, in the abuser's country of origin, as well as the host country. In order to ensure any risk of harm is fully considered prior to referral to external authorities, all cases where this is potentially appropriate must be referred to the relevant Headquarter / Legal department for advice.

PSEA STANDARDS

The PSEA Standards below apply to all Action Against Hunger staff and Associated Personnel related to conduct and behaviour required in personal and professional life. The standards below do not represent an exhaustive list.

All staff, Associated Personnel and Representatives of Action Against Hunger will:

1. Treat all people at all times with dignity and respect.
2. Abide by the provisions, standards and commitments laid out in this Policy.
3. Undertake required awareness raising and other training related to this Policy.
4. Create and maintain an environment that prevents the potential for sexual exploitation and abuse to occur.
5. Report any concerns or suspicions about a breach of this Policy according to the prescribed channels and in a timely manner.

All staff, Associated Personnel and Representatives of Action Against Hunger will not:

6. Engage in sexually exploitative relationships, nor request any service or sexual favour from participants of Action Against Hunger programs, children or others in the communities in which Action Against Hunger works, in return for protection or assistance.
7. Have sex or engage in sexual activities with program participants. This is because there is an inherent conflict of interest and potential for abuse of power in such relationships.
8. Engage in sexual activity with a child which is any person under the age of 18. This applies regardless of the local age of consent, i.e., the local or national laws of the country in which the employee or representative works or regardless of the age of consent in the home country of the Action Against Hunger employee or representative. Ignorance or mistaken belief of the child's age is not a defence.
9. Exchange money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. Sexual acts with paid sex workers are prohibited at all times, regardless of the local or national law or habits and practices concerning sex work or prostitution in the country.

REPORTING CONCERNS

All staff, Associated Personnel and Representatives are obliged to report any concerns or suspicions they have regarding possible violations of this Policy as laid out in the Reporting Procedures. This obligation to report includes concerns or suspicions involving any other humanitarian worker, regardless of whether or not s/he is an employee or representative of Action Against Hunger. In order to prevent sexual exploitation and abuse, it is a duty and responsibility to report concerns and failure to do so represents a breach of this Policy, will be treated seriously and could lead to administrative or disciplinary action.

Action Against Hunger will take action against any staff or representative who seeks or carries out retaliatory action against those who have reported concerns or are involved in investigating or handling them.

Action Against Hunger will investigate allegations of sexual exploitation and abuse involving Action Against Hunger staff, Associated Personnel and/or Representatives in a timely and professional manner. This includes the use of appropriate interviewing practices with complainants and witnesses, particularly with children. We will engage professional investigators or secure investigative expertise as appropriate.

In order to protect those involved, sensitive information related to incidents of sexual exploitation and abuse will be treated confidentially and shared only with discretion and on a needs-to-know basis.

PSEA SPECIFIC ROLES and RESPONSIBILITIES

Board and Directors recognize their ultimate accountability for the organization's measures to prevent and respond to sexual exploitation and abuse. They commit to supporting its implementation by:

1. Creating a positive organizational culture to support a safeguarding environment which will help to prevent sexual exploitation and abuse.
2. Reviewing and updating this Policy every two years.
3. Monitoring and reviewing the Policy's implementation at a senior level, including via an annual Policy Implementation Review, and ensuring lessons learnt from this are embedded across the organization.
4. Ensuring there are sufficient resources available across the organization to support effective the implementation of this Policy.
5. Protecting the credibility and reputation of Action Against Hunger via effective oversight of this Policy and its implementation.
6. Agreeing protocols with regulatory and donor bodies for the handling and reporting of sexual exploitation and abuse information and cases.
7. Role modelling the standards of conduct and behaviour required by this Policy.

Staff, Associated Personnel and Representatives

All staff, Associated Personnel and representatives of Action Against Hunger must contribute individually and collectively to creating an environment that promotes the implementation of this Policy and prevents sexual exploitation and abuse. They will support implementation of this Policy by:

1. Knowing, understanding and abiding by both the specific requirements of the Policy, its specified Standards, and its spirit.
2. Fulfilling any specific requirements related to the prevention of sexual exploitation and abuse required in their positions.

Managers and Supervisors

In addition to the actions applicable to all Action Against Hunger staff and representatives, managers and supervisors at all levels will also support this Policy implementation in their areas of responsibility by:

1. Ensuring all Action Against Hunger staff and representatives understand and comply with all aspects of this Policy.
2. Creating an organizational culture and fostering a working environment which is free from and prevents exploitation and abuse and supports the implementation of this Policy.
3. Applying and maintaining mechanisms and managerial systems to support the implementation of this Policy including effective supervision, awareness raising, prevention, reporting, and responding.
4. Role modelling the standards of conduct and behaviour required by this Policy.

Organizational

To support the implementation of this Policy, the organization commits to:

1. Creating a culture which supports safeguarding and prevents sexual exploitation and abuse.
2. Developing organization-specific strategies, policies, procedures and action plans to prevent and respond to sexual exploitation and abuse.
3. Aligning this Policy across all organizational HR systems, policies and procedures, including but not limited to recruitment and selection, on-boarding, induction and orientation, performance management, reward, and learning and development. Specific job / role responsibilities for the prevention of sexual exploitation and abuse will also be captured in job descriptions.
4. Seeking to prevent perpetrators of sexual exploitation and abuse from being hired, rehired or redeployed by Action Against Hunger and other organizations within the international development and humanitarian sector. This could include use of background and criminal reference checks.
5. Working and collaborating with other organizations and stakeholders to develop practices and mechanisms that facilitate greater transparency regarding the handling and reporting of sexual exploitation and abuse cases.
6. Establishing and ensuring complaint mechanisms for reporting sexual exploitation and abuse are accessible, particularly to participants of Action Against Hunger programs, and that Action Against Hunger focal points for receiving complaints understand how to discharge their duties. These will be regularly reviewed to ensure they are fit for purpose.
7. Taking swift and appropriate action, including legal action when required, against Action Against Hunger employees and representatives who commit SEA and / or breach the Policy Standards.
8. Providing assistance (such as medical or legal) and basic psychosocial support as appropriate and feasible to those involved in complaints of sexual exploitation and abuse.
9. Creating and maintaining mechanisms to ensure awareness of and systematically train Action Against Hunger employees and representatives about this Policy and measures taken to prevent and respond to sexual exploitation and abuse.
10. Creating and maintaining mechanisms to ensure awareness of program participants about the provisions and standards contained in this Policy, the behaviour and conduct they can rightfully expect of Action Against Hunger staff and representatives, and how to raise any concerns or suspicions about a potential breach of this Policy.
11. Ensuring that when engaging in partnership, sub-grant or sub-recipient agreements, these agreements a) incorporate this Policy as an attachment OR that contracting entities have their own accompanying investigation mechanisms in place b) include the appropriate language requiring such contracting entities and individuals, and their staff and representatives to comply with this Policy OR their own policy; and c) expressly state that the failure of those entities or individuals, as appropriate, to take preventive measures against sexual exploitation and abuse, to investigate allegations thereof, or to take corrective actions when sexual exploitation or abuse has occurred, shall constitute grounds for Action Against Hunger to terminate such agreements.
12. Actively engaging with a broad range of internal and external stakeholders to prevent and respond to SEA.
13. Embedding risk assessment and mitigation of SEA in program design and organizational risk management.



ANNEX II: CHILD SAFEGUARDING POLICY

INTRODUCTION

It is both a fundamental belief and duty of Action Against Hunger to focus on the prevention of child maltreatment and exploitation, while also advocating child safeguarding in all that we do. Children can be extremely vulnerable, especially in situations of poverty, humanitarian crisis or conflict and deserve higher standards of protection. Considerations such as class, gender, ethnicity, race, sexual orientation, disability or being displaced, further increase a child's vulnerability to child abuse and exploitation, which occurs in many different forms throughout all communities and cultures. As an organization we find our work often takes place in environments where people might be considered to be at their most vulnerable, and these realities and circumstances can augment the vulnerability of children increasing the opportunities for abuse to occur. Within the populations most commonly working with the organization, a significant number of the program participants are children under the age of 18 who are the focus of this policy.

While Action Against Hunger is not specifically a child- focused organisation, we come into contact with children every day in the course of our work. In the delivery of our work, we are committed to upholding the rights of children, and safeguarding them against actions (intended or unintended) that place them at risk of all forms of violence and harm, including child abuse and exploitation. As a member of the international non-governmental community, Action Against Hunger recognizes its responsibility to safeguard children from those who may use its work to assist them in the abuse and exploitation of children.

STATEMENT OF COMMITMENT

Action Against Hunger places human dignity and protection of vulnerable peoples, including children, at the center of our work. We unequivocally oppose all forms of abuse, exploitation, discrimination and manipulation of children as set out in the United Nations Convention on the Rights of the Child. We recognize that we have a fundamental duty of care toward children with whom we work, and we acknowledge our responsibility to keep children safe in every way while engaged in our programs and activities. We take seriously all concerns about abuse, exploitation, and harassment which contravene this policy, and will instigate investigations and take warranted disciplinary action as required.

This child safeguarding policy details the practices that we employ to ensure that Action Against Hunger is a child-safe organization. Child safeguarding is everyone's responsibility to protect children from mistreatment, prevent impairment to their development, ensure as much as possible that they are provided with safe and effective care, and remove barriers to enable them to have the best outcome possible. This Policy therefore forms the basis of the organization's working practices in relation to the issue of Child Safeguarding.

VALUES AND PRINCIPALS

Action Against Hunger has a ZERO TOLERANCE policy towards child abuse, child exploitation and/or violence against children, and will take reasonable and appropriate steps to prevent abuse from occurring in the first place while ensuring our program activities do not impact on children negatively. Our commitment to prioritize the welfare of children in our programming and ensure protection from abuse and exploitation is shared by all our staff and Associated Personnel. Action Against Hunger will not permit staff

or Associated Personnel to work with children if they pose an unacceptable risk to children's safety or wellbeing.

We recognise that the abuse and exploitation of children happens in all countries and societies across the world, and that all forms of child abuse involve the violation of children's rights. Child abuse is never acceptable and a commitment to children's rights in general also means a commitment to safeguard the children with whom Action Against Hunger is in contact.

The following represents the core values and principles of our work with children, where their welfare is fundamental to our work:

- Strive to understand and respect children within the local context in which they live.
- All types of child abuse or exploitation are unacceptable.
- All children regardless of gender identity, age, sexual orientation, ability, ethnicity, religion, race, socioeconomic status/class or political view are to be protected.
- All team members will endorse an environment of respect and trust with children, recognizing them as individuals in their own right.
- All concerns and allegations of child abuse, exploitation, discrimination, and manipulation will be taken seriously by team members and responded to appropriately.
- All relevant concerns expressed by children will be taken seriously by team members.
- Action Against Hunger will work in partnership with parents/caregivers and other relevant organizations and professionals to ensure the safety of children.

Action Against Hunger therefore commits to the following:

- Take positive steps to ensure the protection of children who are the subject of any concerns.
- Support children, personnel or other adults who raise concerns or who are the subject of concerns.
- Act appropriately and effectively in instigating or co-operating with any subsequent process of investigation.
- Demonstrate responsibility to and respect for children by being sensitive in our communications that involve them.
- Enforce stringent recruitment and selection measures that have been designed to minimize the possibility of recruiting persons who may pose a risk to children.

Human Resources will adhere to strict guidelines in the recruiting process of new staff, with processes updated regularly to ensure that they accurately reflect child-safe recruiting and screening standards. This will include:

- A clear and bold statement that confirms our commitment to child safeguarding in all advertising.
- Adopting 'best practice' recruitment and selection techniques.
- Targeted interview questions for those working directly or indirectly with children.
- Consistent conduct of reference checks that specifically ask about child safeguarding concerns.

Staff and Associated Personnel who will perform work for Action Against Hunger in direct contact with children will be required to undergo rigorous background checks prior to commencement of employment, which may include criminal record check from their country of origin and/or from the international criminal record check.

On-going information sessions on Child Safeguarding will be presented within the organization periodically to ensure that all staff and Associated Personnel are familiar with and understand the policy. In addition, staff and Associated Personnel will be trained as appropriate and depending on their area of

responsibility, for awareness of issues related to the protection of children from abuse and exploitation, with further training provided at a departmental level that will be tailored to the needs of the department.

Action Against Hunger and its associates will not participate in any exploitative labour practices, including child labour. The organization will conduct all reasonably feasible research to ensure that no vendors, sub-contractors or partners are engaged in child labour practices. All local employment laws will be adhered to in regard to employing anyone under the age of 18.

CHILD SAFEGUARDING SPECIFIC PREVENTION MEASURES

Action Against Hunger will take appropriate measures to prevent any form of abuse taking place at the hands of any staff or Associated Personnel while taking steps to ensure that all concerns and allegations of any abuse are taken seriously and investigated thoroughly.

This includes guidance and core commitments to ensure staff and Associated Personnel:

- be vigilant and alert to their own behavior (in order to avoid situations where they may be accused of inappropriate behavior).
- take all steps necessary to promote safe environments for children and feel able to raise concerns with their managers who will work with them to ensure every precaution is taken.
- Will not ever be alone with a child
- Ensure that all program participants (including children) will be made aware of this policy and their right to be protected in an appropriate manner.
- Receive training in child safeguarding commensurate with their responsibilities.
- have a duty to report if they suspect that a child is in a situation in which they are in danger or could be a danger to others.

All Action Against Hunger program design must consider the impact on children and identify program activities which may have potential to negatively impact children in order to minimize risk. Where potential risk has been identified that would negatively impact children as a result of our programming, we will seek alternative activities to mitigate this situation.

SPECIAL CONSIDERATIONS FOR MEDIA / COMMUNICATIONS INITIATIVES

Action Against Hunger commits to treating all children fairly, with respect and dignity, therefore will seek to protect the rights of children in matters of media and communications, acting in a manner that ensures that their best interests shall be the paramount consideration. Pictures, images, or other likenesses of children and/or information related to children that could compromise their care and protection will not be made available through any form of communication media without proper protection and understanding of their use.

Any images of children should not be accompanied by detailed information relating to their place of residence or with identifiable data that may place them or their households at harm. Images with corresponding text which may identify a child will be removed. Action Against Hunger is committed to work closely with international colleagues and to follow international best practices to ensure images taken will be used appropriately. These practices include:

Procedures for Photography/Video/Interviews:

- A signed media waiver (signed by the child's guardians) will be obtained before taking pictures or photographs of any child participating in a program. The waiver will include language that covers all possible uses for the media.
- The signed waivers will be stored in a space accessible to the Action Against Hunger office for three (3) years after the child has completed their involvement with the organization.
- Assess any potential risks to the child, including possible reprisals, stigmatization, and prosecution.
- Ensure that the child knows who the interviewer/photographer/videographer is, why they're doing what they are, and for what purpose it might be used.

- Do not 'stage' – do not ask a child to tell a story that is not theirs or promote something in which they are not invested.
- Confirm the accuracy of what the child says with other children and/or adults, as possible.
- If it seems that a child is possibly being coerced into what they are saying, confirm the accuracy and report concerns immediately. Do not use said footage until complete, and if doubt remains then do not use footage.

Procedures for Sharing Photography/Video/Interviews:

- No child shall be further stigmatized by our media. Avoid categorizations or descriptions that expose children to negative reprisals.
- Always provide an accurate context for a child's story and/or image.
- Do not include any unnecessary identifying information, unless specifically obtaining permission from the child's guardian.
- Always change the name and obscure any visual identification features of a child who is identified as a victim or perpetrator of abuse or crime unless permission is specifically obtained from the child's guardian.
- When sharing the story of the child, do not make assumptions about their identity – ask them their name/how they want to be identified and their gender pronoun if needed.
- Children used in our media publications will always be fully clothed. Shirtless children will only be used if express permission is given.
- Ensure that a child's dignity is put first – avoid portraying them as helpless or victims.
- If a child or their signing family member asks any team member or the organization to cease using their image/story, we will comply immediately.

Action Against Hunger will provide children (and their parent/legal guardian) with all necessary details to make an informed decision regarding their participation in programs and activities, including any voice recordings, video or photographs, including how and where these will be used. Participation and/or usage of information and/or images will only take place after consent has been obtained.

CHILD- SAFEGUARDING SPECIFIC REPORTING

Reporting mechanisms will be established that enable the safe reporting of child safeguarding concerns, ensuring the appropriate escalation of concerns within the organization, referral to the appropriate authorities when necessary, and maintain confidentiality. Reporting mechanisms will be designed so that children are able to access them, are user friendly and sensitive to their differing needs.

All team members have a duty to report any disclosed, witnessed or suspected harm to a child, possible future harm to a child, or harm that the child has/will cause. Staff and Associated Personnel must immediately report the incident to appropriate management within the established reporting channel.

It may be necessary for senior management to respond immediately to protect the child from further potential abuse or victimization. The family /guardian of the child will be consulted as appropriate and may be included in an investigation.

Any allegation, belief or suspicion of sexual or physical abuse (past or present) by staff, Associated Personnel, volunteer, visitor or other partner which is reported will instigate internal investigation of the incident. Other child abuse reports that do not directly involve Action Against Hunger or its work may be referred to external organizations who deal with child rights, such as a relevant government body or authority, or specialized child protection organization.

Action Against Hunger recognizes that children with disabilities are a particularly vulnerable group within the communities, though understanding of what constitutes a disability may be broad in definition⁸. Where a child with disability is experiencing abuse, they may not necessarily understand that their rights have been violated or they may not have the confidence to bring about a complaint. Action Against Hunger staff and Associated Personnel have a responsibility to report any rumors of, or suspected acts of abuse towards a child with disability.

When child abuse or harm is suspected, witnessed or reported, the best interest of the child must be assessed and following steps are to be taken:

1. Ensure the safety of the child. If a child reports an incident, listen to them calmly and take them seriously.
2. Never be alone with the child. If the child prefers to discuss the situation with one individual, ensure a secondary adult is in close vicinity (where they can hear the child if they speak in a loud voice and/or can see them).
3. Consider who will make the child most comfortable when determining who will speak to the child (ex. take sex, age, previous relationship into consideration).
4. Reassure the child that they are not to blame.
5. Be honest. Do not promise confidentiality. Explain that you may have to share this information with someone who will be able to help them. Inform the child of the steps you will take. Tell the child that you believe them and are glad that they told you.
6. Ask questions only to get the necessary information. Do not lead the child in any way, and do not ask them about feelings if they do not offer the information – you are reporting the information, but you are not a counselor and do not have the resources to continue to support this child.
7. Make sure you are clear about what the child says before you report it.
8. To ensure trust and comfort of the child, do not tape record information while speaking with the child. If you need to take notes, ask the child's permission. When the child is no longer in your presence record what the child said in clear and accurate detail as soon as possible – use an Incident Report, but if none is immediately available then just document on paper.
9. Maintain a level of confidentiality; only discuss the matter with those necessary to protect the child, do not disclose unnecessary details.

Incidents must be reported using an official Incident Report within 24 hours of the incident occurring or being disclosed. If no report is available, record all factual details on paper without judgement statements.

The person receiving the report clarifies information as necessary, and then decides on further action based on the incident. If the child is in serious danger the first step is to take immediate necessary action to ensure the safety of the child, which may involve calling school officials, guardians, or Child Protective Services. Every step along the way is to be recorded in full, ensuring that all reports and logs are in one document/file.

If the alleged perpetrator is staff or Associated Personnel, senior management must take immediate action to ensure they are removed from interaction with children and the necessary authorities are alerted. Where there is a report made against any staff or Associated Personnel, the best interests of the child/young person may warrant their temporary suspension during an investigation. The alleged perpetrator will be advised of the reported incident and where there is a suspension instigated, they will continue to receive full pay and are entitled to a just process that does not pre-suppose guilt or innocence. The allegations should not be discussed or communicated to other people until such have been considered and a decision made by management including pursuing the matter further and/or dismissal.

⁸ Disability is not confined to the physical form however includes those with total or partial loss of a person's mental function, presence of disease or illness, malformation or disfigurement, and a disorder or illness which affects a child's thought process, development level, perception of reality, emotions or judgment.

CHILD-SPECIFIC TERMS AND DEFINITIONS

Child Abuse: Anything which individuals, institutions or processes do or fail to do which directly or indirectly harms children or damages their prospect of safe and healthy development into adulthood. The main categories of child abuse are:

- I. Physical Abuse: The use of physical force that causes actual or likely physical injury or suffering (e.g., hitting, shaking, burning, female genital mutilation, torture).
- II. Emotional / verbal abuse: Any humiliating or degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation.
- III. Neglect/Negligent Treatment: Persistent failure to meet a child's basic physical and/or psychological needs, for example by failing to provide adequate food, clothing and/or shelter; failing to prevent harm; failing to ensure adequate supervision; or failing to ensure access to appropriate medical care or treatment to the extent that a child's health and development are at risk.
- IV. Sexual Abuse: All forms of sexual violence, including incest, early and forced marriage, rape, involvement in pornography, and sexual slavery. Child sexual abuse also may include indecent touching or exposure, using sexually explicit language towards a child and showing children pornographic material.
- V. Sexual Exploitation: 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. This includes exchange of assistance due to children benefiting from organizational programming. The sexual exploitation of a child who is under the age of consent is child sexual abuse and a criminal offense.

Working with Children: Those working in a position that involves regular contact with children, either under the job description or due to the nature of the work environment.