Safeguarding Policy

Statement
The Hunger Project (THP) is committed to the human dignity of all people and thus does not tolerate any form of exploitation, abuse or harassment, whether verbal, physical or sexual in nature, anywhere in our organization or in our work.

Scope
There are two groups in policy scope:

THP Affiliated Person is anyone officially affiliated with THP: it refers to all full time and part time staff members, board members, national advisory committee members, volunteers and / or interns under direct supervision of staff, and any other person who is officially contracted to represent THP.

Affiliated Persons are expected to comply with the principles and requirements specified in this policy.

THP Associated Person is anyone not officially affiliated with THP who may however be associated or perceived to be associated with THP: it refers to community partners (including animators, catalysts and other volunteer community organizers), partner organizations, vendors, consultants, independent contractors and sub-contractors, investors, guests, or any other person who is perceived to be associated with THP.

Associated Persons are expected to act in accordance with the principles and requirements specified in this policy.

Key Terms
Safeguarding is the set of measures designed to prevent and address behavior by THP Affiliated or Associated persons that threatens the safety, well-being or human rights of others. Said behavior is unacceptable and is hereafter referred to as misconduct. Specific examples of such misconduct are detailed in Appendix 1.

Local Compliance
We recognize that laws and requirements may differ among countries, and that approaches cannot be universal. For those reasons, when needed, any THP country may develop additional local policies to meet specific local requirements. However, in no circumstances will the additional local policies serve to weaken or contradict this global policy.

Approved by the Global Board, May 6, 2020
Accountability
Within the Global Board, this policy resides under the Governance, Nominating and Human Resources (GNHR) Committee and its Chair.

THP enforces this policy and monitors how it is applied to and respected by Affiliated Persons. Failure by Affiliated Persons to follow this policy could lead to disciplinary action, which may ultimately result in termination of employment, contract or other forms of official affiliation.

THP will, to the extent possible, monitor how this policy is applied to and respected by Associated Persons. Failure by Associated Persons to follow this policy could result in termination of partnership agreement, or other forms of association.

At the Global staff level, responsibility for this policy lies with the Head of Human Resources in the Global Office (hereafter referred to as Global Office).

At the local level, from among existing staff, a Safeguarding Officer is appointed in each office, who is:

- Naturally skilled with handling sensitive issues and information.
- Trusted and respected by staff and community members.
- Trained in how to handle safeguarding issues.

The Safeguarding Officer is tasked with the following key responsibilities:

- Attend annual training of trainers on safeguarding provided by the Global Office.
- Brief new Affiliated Persons and conduct an annual local training on safeguarding.
- Promote ongoing awareness on the importance of safeguarding.
- Ensure that reporting mechanisms are in place, both in the workplace and in communities.
- Conduct the initial fact gathering regarding any issues reported.
- Coordinate with the Global Office about concerns and investigations.

Approach
This policy is organized by the five phases of Safeguarding:

1. Prevention. Proactive efforts to keep misconduct from occurring in the first place.
2. Reporting. Procedures for detecting and reporting incidents that do occur.
3. Investigation. Steps involved in fully understanding the facts of a reported incident.
4. Discipline. The unequivocal consequences of misconduct.
5. Closure. Informing the complainant of THP’s determination in the matter.

1. Prevention

1.1. Policies
This policy comes under the umbrella of THP’s Code of Conduct which is a set of guiding standards and principles that all representatives of THP adhere to in practice and in spirit in all their decisions, procedures, actions and interactions.

All THP Affiliated Persons are required to familiarize with and attest to the Code and its associated policies upon joining THP and annually thereafter. Associated Persons that contract with THP or are
visitors from other countries are required to sign the Code prior to making visits to THP program sites.

**Dissemination**
This policy will be made available on our global website and in the policy handbooks of all THP offices. It will be provided to all Affiliated Persons as part of their orientation. Summary forms of this policy (such as a poster in local language in partner communities) or a link to the full policy will be provided to Associated Persons at local offices and epicenters.

**Continuous Review**
By the Global Office: Every reported incident will trigger a review of the policy to determine if, and which, change in our policies and practices could avoid a repeat of the same situation. New policies, white papers, training and recommendations from peer organizations or donors will be considered to improve the policy.

By the Global Board: This policy will be annually reviewed by the Global Board and updated as needed, informed by recommendations of the Global Office.

1.2. **Recruitment of Affiliated Persons**

**Advertisement**
Recruiting materials, including advertisements, will refer to key policies including this safeguarding policy.

**Interview and References**
Appropriate questions will be asked during the interview and reference check process to evaluate a candidate’s commitment to safeguarding principles and to reduce the chance that prior offenders join THP’s team.

**Background Check**
THP Affiliated Persons who will work directly with children will be required, if available in their country of origin, to provide a certificate of good behavior. In addition, a criminal background check of such persons that specifically checks for prior incidents of child-related misconduct of any kind will be conducted.

1.3. **Training**
Each employee will undergo safeguarding training on an annual basis. In order to further foster a culture of transparency and respect in line with our Code of Conduct, the annual training will include a discussion on where the boundaries between normal and unwanted behavior lie. Any change in policy will be accompanied by appropriate training as necessary.

2. **Reporting**
It is mandatory for all THP Affiliated Persons to immediately report any witnessed, suspected or alleged misconduct whether the incident occurred at the workplace or in a community. THP’s Whistleblower Policy (available online at thp.org) protects Affiliated and Associated Persons from adverse consequences of reporting incidents in good faith.
There is a deeply entrenched culture of silence around exploitation, abuse and harassment. For that reason, it is incumbent upon all THP offices to create reporting mechanisms that make it easy and safe for victims and observers to report any such misconduct.

Each THP Program Country will post clear information in each of its offices and in each epicenter with instructions for how to report any witnessed, suspected or alleged misconduct. This will include contact information for the Safeguarding Officer as well as the third-party whistleblower hotline information as described in Appendix 2.

All alleged incidents must be reported by the Safeguarding Officer to the Global Office promptly. The Global Office will report annually to the GNHR Committee on all reported incidents and their outcome. Serious incidents are reported as quickly as practicable to the Chair of GNHR and the Head of Global Communications, who will advise on a holding statement and FAQ document for external communication purposes as necessary.

The Global Office will inform Partner Countries that fund the work in the Program Country where an incident is reported. If required, the Partner Country will inform donors that an incident took place, and of its resolution. In turn, the Partner Country will report back to the Global Office and Program Country, on the exchange with the donor and any communication and corrective action that might follow.

3. Investigation
All suspected misconduct must be investigated. This includes rumors as well as formal reports.

3.1. Investigator
If the incident occurred in a country office, the Safeguarding Officer or Country Leader is responsible for the investigation, with support from the Global Office. If there is any allegation that the Safeguarding Officer or Country Leader is involved in the incident, or if the incident occurred in the Global Office, the Head of Human Resources in the Global Office is responsible for the investigation. If the Head of Human Resources in the Global Office is alleged to be involved in the incident, then the appropriate global executive is responsible for the investigation, and / or the matter is referred to the Chair of the GNHR Committee of the Global Board.

Depending on the seriousness and complexity of the allegation, the investigation may be handled internally or referred to an outside expert, after consultation with the Global Office.

3.2. Process
- The initial response to any allegation is to take the report seriously. Safeguarding Officers or others who receive a complaint must not perpetuate the culture of diminishment around these serious issues;
- It is key to take all reasonable precautions to ensure protection of the alleged victim, including but not limited to removing the alleged victim and/or perpetrator from the situation, and offering access to professional psychological support;
- The Investigator may review relevant documents including electronic communications and take steps to obtain and preserve those documents;
- The Investigator may interview parties involved, including relevant witnesses;
- The Investigator will write an Incident Report (available on THP’s Intranet at sites.google.com/a/thp.org) to document the investigation.
3.3. Confidentiality
THP will maintain the confidentiality of the complainant, the accused, and any witnesses, and each of their statements and records, to the fullest extent practicable and appropriate under the circumstances. THP cannot promise absolute confidentiality but will conduct the investigation on a need-to-know basis.

4. Discipline
Disciplinary action will be taken against any THP Affiliated or Associated Person found to have:
- Engaged in conduct that has violated THP policies;
- Contributed to the creation or continuation of a hostile work environment;
- Failed to report an exploitation, abuse or harassment concern;
- Intentionally made a false allegation; or
- Obstructed an internal investigation.

Disciplinary action may include, but is not limited to:
- Termination of all relations including employment, contractual or partnership agreements; and
- Reporting to authorities if it is suspected that a crime has been committed.

In addition to any disciplinary action taken by THP, the THP Affiliated and Associated Persons may be held personally liable for monetary damages if a civil action is filed against him or her.

5. Closure
THP will inform the complainant, if known, of its determination as to whether THP policy was violated. However, THP will generally not disclose the nature of any disciplinary action that may have been taken because discipline is a confidential matter between THP and the individual subject to corrective action. Discipline may take many forms, and those who raise concerns should not assume that disciplinary measures have not been implemented simply because THP does not publicize such measures. Responsive action may include, for example, training, referral to counseling, or disciplinary action such as warning, reprimand, withholding of a promotion or pay increase, reassignment, temporary suspension without pay, termination, and/or pressing charges, as The Hunger Project believes appropriate under the circumstances.
Appendix 1: Types of Misconduct

Unacceptable behavior under this policy may include, but is not limited to, the following types of misconduct:

- **Abuse of Power:** the nature of NGO work creates an inherently unequal power dynamic—between those employed by or working with the NGO (which has resources and status), and the members of the communities where we work (who frequently have fewer resources and/or status). Misuse of authority is the commission of an unlawful act, done in an official capacity, in the course of performing work.

- **Child Abuse:** verbal, physical, emotional or sexual abuse of a person under 18 years of age or above if legally higher in a specific country.

- **Gender-Based Violence:** actions resulting in physical, sexual, psychological or economic harm or suffering to women and/or girls, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life.

- **Disability Abuse:** physical, financial, sexual and/or psychological abuse toward a person with a disability.

- **Elder Abuse:** single, or repeated acts, or lack of appropriate action, occurring within a relationship where there is an expectation of trust, which causes harm or distress to an older person.

- **Emotional Abuse:** a behavior designed to hurt another person emotionally, which may include restriction of movement, or treatment that is degrading, humiliating, bullying (including cyber bullying), threatening, discriminating, ridiculing or hostile.

- **Financial Abuse:** when one person improperly restricts access to money from another. This type of abuse may include actions like cutting off appropriate access to bank accounts and preventing appropriate access to financial information.

- **Physical Abuse:** a physical act or threat of a physical act designed to harm another person physically. This type of abuse may include actions like slapping, punching, assault or inappropriate physical contact, intimidating or hostile acts.

- **Sexual Abuse:** any unwanted sexual or threatening act forced on the victim. This form of abuse is also often known as sexual assault or rape. Sexual abuse can include anything from unwanted touching to forced intercourse or forced sexual contact with another person.

- **Sexual Exploitation:** an act or acts committed through non-consensual abuse or exploitation of another person’s sexuality for the purpose of sexual gratification, financial gain, personal benefit or advantage, or any other non-acceptable use. It is the abuse of a position of vulnerability, differential power, or trust for sexual purposes.

- **Sexual Harassment:** unwelcome or inappropriate advances, requests for favors, and other verbal, visual or physical conduct of a sexual nature, as well as offensive remarks about a person’s sex or gender.

- **Spiritual Abuse:** attack against another’s belief system, denying access to a house of worship or forced participation in a cult.

- **Verbal Abuse:** use of words and body language with the intent to hurt another person. Verbal abuse may include put-downs, name-calling, insulting nicknames, derogatory statements, slurs, and unreasonable criticisms.

- **Visual Abuse:** non-verbal communication that hurts others’ dignity, for example displaying sexually suggestive posters, derogatory cartoons or drawings, sending inappropriate adult-themed gifts, leering, or making sexual gestures.
Appendix 2: External Whistleblower Hotline

In addition to other channels set forth in THP’s Whistleblower Protection Policy (https://www.thp.org/wp-content/uploads/2014/08/Whistleblower_Protection_Policy-12-May-2016.pdf), a third-party option has also been made available.

Any witnessed, suspected or alleged misconduct may be reported in the following ways:

- www.TheHungerProject.ethicspoint.com
- USA Toll-free phone number: 1-844-425-1098
- Local phone number as made available in in-country material and on www.TheHungerProject.ethicspoint.com