

# FHI 360'S FRAMEWORK & MINIMUM STANDARDS FOR SAFEGUARDING PROGRAM PARTICIPANTS



Available in **Arabic, French, Portuguese, and Spanish**

**Safeguarding Program Participants:** Protecting program participants from sexual exploitation and abuse (SEA) and other harm as a result of their engagement with FHI 360 programs, including harm committed by FHI 360 personnel or partner personnel.

**Program Participant:** Per FHI 360's policies, a "program participant" is "any person who is served by an FHI 360 program or has contact with FHI 360 Personnel, Suppliers, or Supplier Personnel in connection with or as a result of FHI 360's programs or business activities." Note: Some program participants are more vulnerable to exploitation, violence, and other abuse (e.g., women, children, LGBTQ+ people, people with disabilities, people who sell sex, refugees), especially during the delivery of certain services, such as health services, aid distribution, and/or activities that are implemented in high-risk settings (e.g., schools, conflict areas).

**Supplier:** Per FHI 360 policy, a supplier refers to a contractor, vendor, service provider, subcontractor, subrecipient, or consultant. The term "partner" is often used interchangeably with "supplier."

## INTRODUCTION

FHI 360's framework for safeguarding program participants includes a set of minimum standards (required actions) that are organized under eight domains.<sup>1</sup> **The minimum standards apply to all FHI 360 projects that involve interaction with program participants, regardless of whether FHI 360 is the prime or a sub to another organization.** The standards are designed to help country offices and FHI 360 project teams ensure uniform application of FHI 360's *Safeguarding Policies*. When effectively and fully implemented, the minimum standards mitigate safeguarding-related risks and help us respond effectively if harm does occur.

At the center of this framework are four elements that provide a foundation for effective implementation of the minimum standards:

- **Organizational Values and Culture:** Everything we do to safeguard program participants relies on an ongoing commitment to our organizational values and beliefs that everyone who interacts with our organization has the human right to live free from violence and other abuse and must be treated with dignity and respect.
- **Program Participant Engagement:** Input from program participants is essential to develop safe and effective strategies.
- **Leadership and Policies:** Everyone has a role in maintaining safety in our work environments and programs, and leadership teams have a unique role in 1) promoting and maintaining a safe and positive organizational culture that supports our safeguarding efforts; and 2) ensuring that our safeguarding policies and other requirements are known by FHI 360 and partner personnel and effectively integrated into projects.



<sup>1</sup>FHI 360's Framework for Safeguarding Program Participants is informed by and aligns with the *Inter-Agency Standing Committee's (IASC) Six Core Principles Relating to Sexual Exploitation and Abuse*; *Interaction's Framework for Creating a Safer Work Environment*; *IASC's Minimum Operating Standards*; *OECD Development Assistance Committee (DAC) Recommendations*; *Keeping Children Safe: Setting tough international child safeguarding standards*; *Core Humanitarian Standard on Quality and Accountability*; and major funder requirements, including those outlined in *USAID's Policy on Protection from Sexual Exploitation and Abuse*; *FCDO's Enhanced Due Diligence: Safeguarding for External Partners*; and the *UN Implementing Partner PSEA Capacity Assessment*.

## WHO IS ACCOUNTABLE FOR ENSURING THE MINIMUM STANDARDS ARE IMPLEMENTED?

**Chiefs of Party (COPs) and Project Directors** are accountable and have ultimate oversight for ensuring the minimum standards are met and tools completed for their respective projects, including monitoring adherence to the minimum standards by various staff and escalating issues when actions are not implemented.

### Safeguarding Program Participants: Minimum Standards (Required Actions)

#### DOMAIN 1: RISK ASSESSMENT AND ACTION PLANNING

- 1.1 Include safeguarding activities in project proposals, work plans, and budgets. **Refer to how-to-note on Connect.**
- 1.2 Complete FHI 360's **Safeguarding Vulnerability Profile Tool** to determine the project's level of vulnerability related to sexual exploitation and abuse (SEA), during proposal development and again within 90 days of project implementation as part of the project's initial work plan development. Upload completed tool under the Safeguarding tab in **Vine**.
- 1.3 FHI 360 country offices: Implement FHI 360's **Universal Anti-Trafficking Compliance Plan ("Universal Plan")** and post copies of the Universal Plan in visible locations at country offices. **Refer to how-to note on Connect.**
- 1.4 FHI 360 projects: Tailor, implement, and post copies of FHI 360's **Universal Plan** in visible locations at project offices and sites, within 90 days of project implementation as part of the project's work plan development, unless required by funder pre-award. Upload completed plan under the Safeguarding tab in **Vine**. **Refer to how-to note on Connect.**
- 1.5 Complete FHI 360's **Safeguarding Risk Assessment and Action Planning (RAAP) Tool** to identify project-related risks and actions to mitigate those risks, within 90 days of project implementation and annually as part of the project's work plan development (quarterly for crisis response projects). Note: The RAAP tool includes a comprehensive set of risk factors and illustrative mitigation strategies, including those related to working with children and other populations that are at higher risk of SEA. Projects that involve interaction with children need to refer to FHI 360's **Child Safeguarding Procedures** for additional information. Upload completed tool under the Safeguarding tab in **Vine**.
- 1.6 Complete FHI 360's **Safeguarding Self-Assessment Tool** to assess adherence to FHI 360's minimum standards within 90 days of project implementation and annually as part of the project's work plan development (quarterly for crisis response projects). Upload completed tool under the Safeguarding tab in **Vine**.

#### DOMAIN 2: SAFE RECRUITMENT AND HIRING

- 2.1 Ask interview questions to assess candidates' alignment with FHI 360's safeguarding values and principles. Teams should refer to **Interview Questions for Hiring Managers and Interview Teams** to find questions.
- 2.2 Conduct and document criminal background checks and reference checks for all candidates, including staff, interns, volunteers, incentivized workers, and consultants. When country systems are not in place for criminal background checks, additional reference checks must be conducted (beyond two), including questions to former employers about **substantiated** safeguarding-related violations. Refer to FHI 360's **Reference Check Form**.
- 2.3 Ensure FHI 360 staff complete mandatory e-module **Safeguarding Program Participants** within 30 days of hire.

#### DOMAIN 3: SAFEGUARDING FOCAL POINTS

- 3.1 Identify a safeguarding focal point to support safeguarding activities. **Refer how-to note on Connect.**

#### DOMAIN 4: SAFEGUARDING/PSEA NETWORKS

- 4.1 Where one exists, participate in the in-country inter-agency PSEA network. Refer to the **UN IASC Dashboard**.

## DOMAIN 5: SUPPLIER AGREEMENTS AND MONITORING

- 5.1 Include safeguarding language in supplier **contracts, agreements, purchase orders, and consultant agreements**. For support, contact the project's point of contact for **Contracts Management Services (CMS)** and **Global Procurement Services (GPS)** to ensure any funder requirements are included.
- 5.2 Conduct a briefing with suppliers that interact with program participants to review FHI 360's safeguarding requirements as outlined in the Terms and Conditions of their contract/agreement and document the briefing via a memo to file.
- 5.3 Share FHI 360's e-module "Safeguarding Program Participants" with suppliers that interact with program participants. Suppliers can use this e-module as a resource to help orient their personnel to FHI 360 safeguarding policies, conditions that increase risk of SEA, requirement to report suspected or known harm against program participants to FHI 360, and how to access FHI 360's reporting mechanisms. The e-module can be accessed by suppliers at [academy.fhi360.org](https://academy.fhi360.org).
- 5.4 Facilitate the completion of FHI 360's **Safeguarding Self-Assessment Tool for Implementing Partners** by subcontractors and subrecipients that interact with program participants within 90 days of contract/agreement signing and annually thereafter. Upload completed tools under the Safeguarding tab in **Vine**.
- 5.5 For subcontractors and subrecipients that interact with program participants and where progress reports are required, ensure partners include updates on progress toward meeting industry standards included in the Safeguarding Self-Assessment Tool for Implementing Partners in any progress reports to FHI 360.
- 5.6 Monitor subcontractor and subrecipient progress toward meeting the industry standards outlined in the Safeguarding Self-Assessment Tool for Implementing Partners and any other requirements per the subcontract or agreement (e.g., include the industry standards from the tool in the project's monitoring plan).

## DOMAIN 6: TRAINING AND CAPACITY STRENGTHENING

- 6.1 Provide in-depth safeguarding training to all FHI 360 personnel and supplier personnel who have interaction with program participants using FHI 360's module **Safeguarding Program Participants: Building Core Knowledge** at the beginning of the project once most staff are onboarded and via refreshers, as needed.
- 6.2 Orient volunteers, incentivized workers, and other non-staff to FHI 360's **Code of Conduct for Volunteers, Incentivized Workers, and Other Non-Staff** and obtain signatures on the code.

## DOMAIN 7: REPORTING MECHANISMS & RESPONDING TO COMPLAINTS

- 7.1 Report suspected or known harm toward program participants committed by FHI 360 personnel or partner personnel using FHI 360's **reporting mechanisms** within 24 hours of receiving information or as soon as possible under the circumstances.
- 7.2 Have an established procedure in place to identify local victim/survivor support services, and refer program participants to medical, psychosocial, shelter, and legal services, where available.
- 7.3 Per **FHI 360's PSEA Policy**, where a community-based complaint mechanism (CBCM) is required or needed, use input from program participants to establish a CBCM. **Refer to CBCM training module.**

## DOMAIN 8: AWARENESS-RAISING AMONG PROGRAM PARTICIPANTS AND STAFF

- 8.1 Ensure **OCIA hotline posters** are visible at all FHI 360 offices and project sites.
- 8.2 Ensure all program participants and project personnel, including partner personnel, volunteers, incentivized workers, other non-staff are aware of key safeguarding messages and how to report harm. Project teams can use FHI 360's **ready-to-use posters** and/or FHI 360's **editable awareness-raising materials** and translate to local languages, as needed, to raise awareness about key safeguarding-related messages and reporting mechanisms.