

FHI 360 Toolkit

How to implement FHI 360's minimum standards
for safeguarding program participants

July 2022



Sexual misconduct and other types of abuse
are rooted in imbalances of power.

“We need to reflect on how we use power and privilege and ensure that we create workplaces of respect and accountability, where misconduct is not tolerated, and where senior management communicates, embodies, and enforces ethical standards.”

– UNHCR

This toolkit was developed to help FHI 360 teams take action at the project level to prevent, mitigate, and respond to misconduct toward program participants committed by our own personnel or partner personnel.

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FOREWORD

We all have a right to live a life free from exploitation and abuse. Unfortunately, in the international development sector, we have seen widespread sexual exploitation and abuse of program participants committed by humanitarian and development workers. Any type of harm, including sexual exploitation and abuse (SEA) toward the program participants who engage with humanitarian and development organizations is an enormous violation of basic human rights with devastating effects on the people who are harmed, often people already in highly vulnerable positions whose trust we have violated. It also causes irreparable damage to an organization's reputation, economic stability, and erases the community's trust in us. Finally, these incidents are a stain on our industry and diminish the credibility of every entity that operates within it.

We have a moral and ethical obligation to ensure this type of harm does not occur at FHI 360 or within any FHI 360-supported project.

Given the diverse portfolio of projects here at FHI 360 --including projects involving populations that are vulnerable to sexual exploitation and abuse in both humanitarian and development settings --it is imperative that we have in place and continuously improve concrete efforts to prevent, mitigate, and respond to any type of harm toward program participants.

We have made good progress, but there is more to do.

Our efforts to prevent harm toward program participants must also go beyond legal- or compliance-focused activities. We need to pay attention to our organizational culture. There is no doubt that the tone is set at the top, and although everyone who works with FHI 360, including our implementing partners, has a role in maintaining safety and respect in our work environments and programs, FHI 360 leadership teams have a responsibility to promote and maintain a safe and positive organizational culture of transparency and inclusion that supports our safeguarding efforts. **As FHI 360's CEO, I am looking to our leadership teams, including project directors and chiefs of party to lead the way with these efforts.**

These standards and procedures align with industry standards and reflect FHI 360's commitment to safeguarding and to helping elevate safeguarding within our organization.

TESSIE SAN MARTIN
CHIEF EXECUTIVE OFFICER, FHI 360

ABBREVIATIONS AND ACRONYMS

CMS	Contracts Management Services
COP	Chief of Party
FCDO	Foreign, Commonwealth & Development Office (United Kingdom)
CBCM	Community-based complaint mechanism
CTIP	Combating trafficking in persons
HR	Human resources
LGBTQ+	Lesbian, gay, bisexual, transgender, queer people, and those of other diverse sexual orientations and gender identities
LOE	Level of effort
M&E	Monitoring and evaluation
OCIA	Office of Compliance and Internal Audit
PSEA	Preventing sexual exploitation and abuse
RAAP	Risk assessment and action planning
SEA	Sexual exploitation and abuse
SFP	Safeguarding focal point
STTA	Short-term technical assistance
TA	Technical assistance
UN	United Nations
USAID	U.S. Agency for International Development

KEY DEFINITIONS

Child: A person under 18 years of age, regardless of the age of majority under local laws.

Child protection: A broad term used to describe efforts to keep children safe from harm. The United Nations Children’s Fund (UNICEF) uses this term to refer to actions that aim to prevent and respond to acts of violence, exploitation, and other abuse of children in all contexts.¹ In international development programming, child protection refers to protecting children from harm that occurs in communities and within families, which is distinct from “child safeguarding.” (See definition of “child safeguarding.”)

Child safeguarding: Child safeguarding is one aspect of a sound child protection approach. It specifically addresses the protection of children from harm that occurs through the delivery of programs, including harm committed by humanitarian and development workers. Keeping Children Safe, an international nonprofit focused on child safeguarding, defines child safeguarding as “the responsibility that organizations 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.”²

Commercial sex: Any sex act on account of which something of value is given to or received by any person. This includes consensual sex work involving adults. In the case of children (people younger than 18 years old), the exchange of anything of value for a sex act is often referred to as transactional sex.

Community-based complaint mechanism (CBCM): A mechanism by which program participants in communities where development or humanitarian programs are being implemented are able and encouraged to safely report grievances — including sexual exploitation and abuse incidents — and those reports are then routed to the appropriate reporting mechanisms/channels for follow-up. A CBCM usually blends both formal and informal community structures, is built on engagement with and input from program participants and can be set up to support multiple organizations (inter-agency CBCM) or to support a single organization or project (intra-agency CBCM) in a location.

Contact with program participants: Involves in-person or virtual interaction with program participants (see definition of program participant below). Virtual contact includes, but is not limited to, electronic or mobile interactions (e.g., phone calls, texting, email, video chat, social media). Contact can be occasional, regular, short-term, or long-term.

¹ UNICEF. Child protection overview — UNICEF data. New York; 2015. Available from: <https://data.unicef.org/topic/child-protection/overview/>.

² Keeping Children Safe. The international child safeguarding standards. London. n.d. Available from: https://mcusercontent.com/c53792304124d6235236f91e5/files/dda79395-78c1-2634-b8d0-b82864c5165c/KCS_CS_Standards_ENG_200218.pdf.

Disciplinary action: A formal action against personnel because of misconduct.

FHI 360 personnel: FHI 360 employees, officers, members of the Board of Directors, interns, and fellows (paid or unpaid), volunteers, agents, and other individuals authorized to act on behalf of FHI 360. This also includes incentivized workers (individuals who receive a stipend).

Forced labor: Knowingly providing or obtaining the labor or services of a person by express or implied threats of serious harm to, or physical restraint against, that person or another person.

Misconduct: Inappropriate behavior toward program participants by FHI 360 personnel or partner personnel, including volunteers and incentivized workers.

Program participant: Any adult or child who is served by FHI 360 programs 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; lesbian, gay, bisexual, transgender, and queer people and those of other diverse sexual orientations and gender identities [LGBTQ+]; people with disabilities; people who sell sex; refugees), especially during the delivery of certain services, such as health services and aid distribution, and/or activities that are implemented in high-risk settings (e.g., schools, health centers, drop-in centers for LGBTQ+ people, conflict areas) as part of humanitarian or development programming.

Project: Synonymous with an award, FHI 360 projects are implemented with outside resources of a funder, donor, or client. A project refers to a set of strategies, interventions, and activities implemented during a specific time period to address a problem, with the expectation of achieving specific goals and objectives.

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

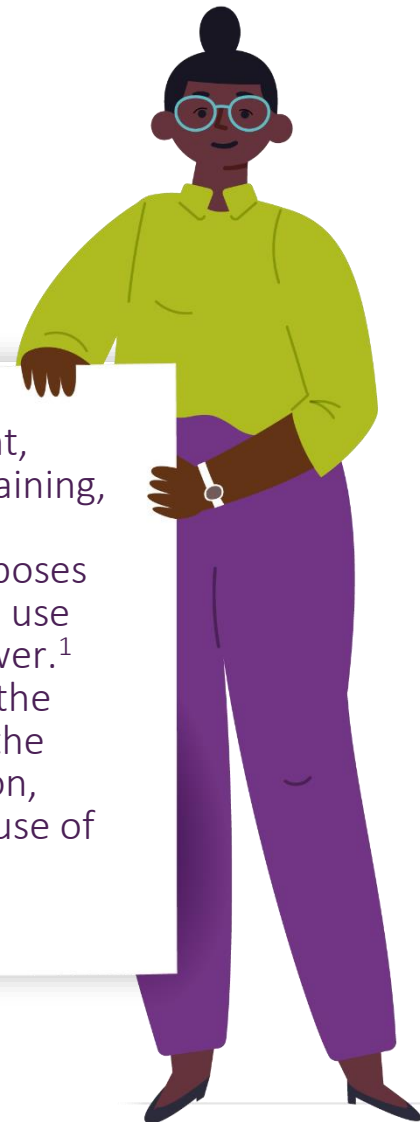
Sexual exploitation: Any actual or attempted abuse of program participants that takes advantage of their position of vulnerability or trust for sexual purposes.

Supplier (partner organization): Defined by FHI 360 policies as a contractor, consultant, vendor, service provider, subcontractor, or subrecipient. Partner organizations are often referred to as implementing partners or suppliers.

Supplier personnel (partner personnel): Supplier's employees, interns, and fellows (paid or unpaid), volunteers, agents, and other individuals authorized to act on supplier's behalf, including incentivized workers (individuals who receive a stipend).

Trafficking in persons (TIP): The recruitment, harboring, transportation, provision, obtaining, or receipt of an adult person (age 18 and older) through the use of force, fraud, coercion, or abuse of power for purposes of commercial sex acts or sexual exploitation, subjection to involuntary servitude, peonage, debt bondage, forced labor or services, or slavery or practices similar to slavery.³

Child trafficking refers to the recruitment, harboring, transportation, provision, obtaining, or receipt of a person who has not yet attained the age of 18 for any of the purposes listed above, whether or not through the use of force, fraud, coercion, or abuse of power.¹ It is important to emphasize that, unlike the definition of trafficking involving adults, the elements of threats, use of force, coercion, abduction, fraud, deception, or other abuse of power, do not need exist in child trafficking cases.



³ United Nations. Protocol to prevent, suppress and punish trafficking in persons especially women and children. New York; 2000. Available from: <https://www.ohchr.org/en/instruments-mechanisms/instruments/protocol-prevent-suppress-and-punish-trafficking-persons>.

SECTION 1

BACKGROUND AND INTRODUCTION

1.1 What does “safeguarding program participants” mean at FHI 360? In the context of international development, safeguarding means preventing harm to people — especially children, youth, and vulnerable adults — during the delivery of development and humanitarian programs. At FHI 360, this means protecting program participants from any type of harm as a result of their engagement with FHI 360 or any of our programs, including sexual exploitation and abuse (SEA), child abuse and neglect, and human trafficking, committed by FHI 360 personnel or partner personnel.

We know that most people who work at FHI 360 and our partner organizations are committed to the principle of do no harm and to treating all people with dignity and respect, but there is always a risk of misconduct. Additionally, although harm to program participants can happen in any setting, there is increased risk of sexual exploitation and other abuse by humanitarian and development workers in times of crisis because of strained infrastructures, limited resources, and diminished systems to protect communities. **FHI 360 has zero tolerance for this type of misconduct and will hold accountable anyone who engages in any type of harm toward program participants.** FHI 360 is implementing enhanced efforts to prevent these harms from happening in the first place, mitigate risks, and ensure we have reporting mechanisms that are accessible to and trusted by program participants so that we can respond quickly, investigate, and provide support to program participants if harm does occur.

1.2 What is FHI 360’s approach to safeguarding program participants? FHI 360 recognizes that SEA violates international human rights conventions and the rights of all people to live free from any type of violence or other abuse.⁴ These rights apply to all areas of personal, public, social, and professional life — and international development organizations have a duty to ensure that these rights are safeguarded during the delivery of humanitarian and development programs.

To increase protections for program participants, FHI 360 created a set of stand-alone safeguarding policies, standards, tools, and procedures that are grounded in a human rights approach to addressing SEA,⁴ while also aligning with international standards and the requirements of the United States Government, United Nations (UN), and the Foreign, Commonwealth & Development Office (FCDO).

⁴ InterAction. A human rights framework for preventing and responding to sexual exploitation, abuse, and harassment. Washington, DC; 2022. Available from: <https://www.interaction.org/resource-library/a-human-rights-framework-for-preventing-sexual-exploitation-abuse-and-harassment/>.

As described in *USAID’s Policy on Protection from Sexual Exploitation and Abuse*:⁵ “SEA is deeply rooted in power imbalances, often linked to social, age-, and gender-related inequalities exacerbated in development and humanitarian contexts in which aid workers often control access to valued commodities and services. In addressing SEA, particular attention is needed for vulnerable groups, including women and children, and those most at risk of discrimination on the basis of disability, gender identity and sexual orientation, race, ethnicity, age, or religion.”

- 1.3 What is the purpose of this toolkit?** This toolkit provides information to help project teams implement FHI 360’s minimum standards for safeguarding program participants (*Section 3*). In line with FHI 360’s directives model, these standards and procedures are “mandatory controls and instructions designed to support and conform to policies.”



- 1.4 Who should use this toolkit?** All projects, including research projects, that involve in-person or virtual interaction with program participants should use this toolkit to help them implement FHI 360’s minimum standards for safeguarding program participants.

Per FHI 360 policies, a program participant is defined as “any adult or child who is served by FHI 360 programs, 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 and aid distribution, and/or activities that are implemented in high-risk settings (e.g., schools, health centers, drop-in centers, conflict areas) as part of humanitarian or development programming.

- 1.5 Why did FHI 360 develop minimum standards for safeguarding program participants?**

Drawing from existing standards and guidance, *FHI 360’s Framework and Minimum Standards for Safeguarding Program Participants* were developed to ensure uniform application of and alignment with FHI 360’s safeguarding policies, major funder requirements, and industry standards. They are required actions for FHI 360 projects that involve interaction with program participants. When effectively and fully implemented, the standards help FHI 360 mitigate safeguarding-related risks and effectively respond if harm occurs. Applying these standards consistently across the organization helps us to be accountable to and protect the fundamental rights of program participants, as well as be accountable to ourselves and external stakeholders, including funders and other partners.

⁵ USAID. Policy on protection from sexual exploitation and abuse (PSEA). Washington, DC; 2020. Available from: https://www.usaid.gov/sites/default/files/documents/1868/PSEA_Policy_Digital.pdf.

FHI 360's Framework and Minimum Standards for Safeguarding Program Participants aligns with USAID's Policy on PSEA,⁶ which states "...the expectation that each partner will take reasonable measures to prevent sexual harassment within its workforce and SEA in programs it implements with USAID funds: This includes the expectation that partners will develop and adhere to a minimum set of internal controls necessary to prevent, detect, assess, address, and resolve these issues, including through the appropriate use of mechanisms to solicit feedback from beneficiaries, and to protect from retaliation those individuals who report abuse." FCDO and the UN have similar expectations.

- 1.6 Who reviewed the minimum standards and required tools?** We received and incorporated input from various headquarters, regional, country office, and project staff, including technical advisors, safeguarding focal points, FHI 360's Safeguarding Committee, Office of Compliance and Internal Audit (OCIA) staff, and other Enterprise Services and Operations staff.
- 1.7 Who do the safeguarding standards and tools apply to?** The minimum standards apply to all FHI 360 projects, including research projects, that involve in-person or virtual interaction with program participants in humanitarian and development settings, regardless of whether FHI 360 is the prime or sub. As such, if we are the prime and the scope of the project involves interaction with program participants — either by FHI 360 or through implementing partners — the standards apply. If we are a sub, and the scope of our work, as a sub, involves interaction with program participants, the standards apply.

Because our definition of "program participant" is broad, program participants on technical assistance (TA)-only projects could be local organization staff, community health care workers, and others. The standards and tools account for the wide range of programs that FHI 360 implements and the different types of program participants involved in our programs, and where needed, qualifiers are placed throughout these tools and procedures. In all cases, safeguarding efforts should be tailored at the project level.

- 1.8 Who is accountable for ensuring the minimum standards are met and tools completed?** All FHI 360 personnel and supplier personnel play a role in safeguarding program participants, and everyone affiliated with our projects is expected to support the implementation of these procedures. However, certain staff members have heightened responsibilities, as described below.

⁶ USAID. Policy on protection from sexual exploitation and abuse (PSEA). Washington, DC; 2020. Available from: https://www.usaid.gov/sites/default/files/documents/1868/PSEA_Policy_Digital.pdf.

Project directors/chiefs of party 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 focal points (SFPs) support the project's safeguarding efforts by coordinating the implementation of the standards and activities described in Section 4 of this document. SFPs can also provide information and guidance to project personnel and implementing partners on all issues related to safeguarding program participants.

Human resources representatives ensure that interviews with all candidates include safeguarding-related questions and conduct and document reference and background checks for all staff.

Country directors/country representatives support project directors/chiefs of party in implementing the minimum standards, as necessary.

Regional offices and business units provide administrative, operational, and technical support and oversight to country offices and projects. Regional office project backstops within these offices can also help ensure that projects implement the minimum standards.

1.9 What oversight will FHI 360 have on ensuring projects adhere to the minimum standards and complete the tools? Again, project directors/COPs are accountable for ensuring the standards are met and tools completed. There is a tab in *Vine* labeled "Safeguarding," where projects will upload completed tools. Vine will generate automated reminders to project directors/COPs and project backstops about when tools are due and overdue, based on the project's start date. FHI 360's Senior Technical Advisor for Safeguarding will utilize Vine to produce reports to flag high-risk projects and projects that are out of compliance to help target technical assistance and provide additional support to teams, as needed. OCIA will also include the standards in their internal audit materials/checklists.

1.10 How does this toolkit align with FHI 360's Child Safeguarding Procedures? Projects that involve interaction with children need to refer to FHI 360's *Child Safeguarding Procedures*, which is a companion document to this toolkit, for additional actions specific to safeguarding children.

SECTION 2

OVERVIEW OF FHI 360'S POLICIES FOR SAFEGUARDING PROGRAM PARTICIPANTS

In addition to the *Code of Ethics and Conduct*, FHI 360 has a set of stand-alone policies that relate to safeguarding program participants. These policies apply to all FHI 360 personnel worldwide, and to suppliers and supplier personnel. Click on the links in the boxes below to read each policy.

[Protecting Program Participants from Sexual Exploitation and Abuse \(PSEA\) Policy](#)

[Arabic, French, Portuguese, Spanish](#)

[Safeguarding of Children Policy](#)

[Arabic, French, Portuguese, Spanish](#)

[Combating Trafficking in Persons Policy](#)

[Arabic, French, Portuguese, Spanish](#)

FHI 360 strictly prohibits any retaliation against FHI 360 personnel, suppliers, supplier personnel, or program participants who report suspected or known violations of these policies or related procedures, or who participate in any internal or government SEA investigations. FHI 360 personnel can refer to FHI 360's *Open Door and No Retaliation policy* for additional information.

FHI 360's PSEA POLICY ALIGNS WITH THE INTERNATIONAL STANDING COMMITTEE (IASC) SIX CORE PRINCIPLES

1. "Sexual exploitation and abuse by humanitarian workers constitute acts of gross misconduct and are therefore grounds for termination of employment.
2. 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.
3. Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior is prohibited. This includes exchange of assistance that is due to beneficiaries.
4. Any sexual relationship between those providing humanitarian assistance and protection 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 humanitarian aid work.
5. Where a humanitarian worker 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.
6. Humanitarian workers 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."

SECTION 3

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

FHI 360's framework for safeguarding program participants includes a set of minimum standards (required actions) that are organized under eight domains.⁷ **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 ([Section 2](#)). 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:** Although everyone has a role in maintaining safety in our work environments and programs, 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 safeguarding policies and other requirements are known by all FHI 360 personnel and partner personnel and effectively integrated into projects.



⁷ 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 \(PSEA\)](#); [FCDO's Enhanced Due Diligence: Safeguarding for External Partners](#); and the [UN Implementing Partner PSEA Capacity Assessment](#).

Safeguarding Program Participants: Minimum Standards (Required Actions)

Additional Resource: [Project Checklist for Safeguarding Program Participants](#)

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 candidates, including staff, interns, volunteers, and consultants. When country systems are not in place for criminal background checks, additional reference checks must be conducted, including questions to former employers about *substantiated* safeguarding-related violations. Refer to FHI 360's *Professional 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 to how-to note on Connect.*

DOMAIN 4: SAFEGUARDING/PSEA NETWORKS

- 4.1 Where one exists, participate in the in-country inter-agency safeguarding/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 or have exposure to 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 own 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.
- 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 or 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 safeguarding requirements 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 and supplier personnel who have interaction with or exposure to 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.

REMINDER FROM OUR CEO

"As FHI 360's CEO, I am looking to our leadership teams, including project directors and chiefs of party to lead the way with these efforts.

These standards and procedures align with industry standards and reflect FHI 360's commitment to safeguarding and to helping elevate safeguarding within our organization."

Tessie San Martin

Summary of the Five Required Tools

Below is a summary of the five required tools that are referenced in *FHI 360's Framework and Minimum Standards for Safeguarding Program Participants* (described above). Projects that involve interaction with program participants, including research projects, are required to complete and upload the tools under the "Safeguarding" tab in *Vine* according to the schedule below (see *instructions for Vine on the next page*). Each tool includes information about how to complete the tool and use the results.

PURPOSE	WHEN/FREQUENCY	Estimated Time to Complete
Tool 1: Vulnerability Profile Tool		
This tool provides a snapshot of a project's vulnerability to SEA based on populations served and context where activities are implemented. Additionally, since vulnerabilities can change between proposal and project start, project teams review and update the tool at the start of the project. Completion of this tool also allows the organization to flag and track high-risk projects to ensure internal controls are in place and to identify projects for additional technical assistance and surge support when needed. (Section 4, Standard 1.2)	During proposal development (upload to proposal shared folder) One time: Within 90 days of project implementation during work plan development	15-30 minutes
Tool 2: Universal Anti-Trafficking Compliance Plan (Universal Plan)		
Emphasizes key elements from FHI 360's Combating Trafficking in Persons (CTIP) Policy and is used as a tool to raise awareness among staff about prohibited conduct and how to report trafficking-related activity. This satisfies major funder requirements to have a CTIP plan in place and helps ensure uniform application of our CTIP policy. Projects are required to use the criteria in the Universal Plan to determine if the project is high risk, and if so, add supplemental measures to further mitigate risks. (Section 4, Standards 1.3 and 1.4)	One time: Within 90 days of project implementation during work plan development unless required by funder pre-award	1-2 hours
Tool 3: Risk Assessment and Action Planning (RAAP) Tool		
Outlines a set of common risk factors (conditions that increase likelihood of SEA/other harm). FHI 360 projects indicate whether each risk factor applies to the project, review illustrative mitigation strategies, and identify actions to address identified risk factors. This tool is completed by the FHI 360 project team. As needed, FHI 360 project teams can engage partners to help complete the RAAP Tool (Section 4, Standard 1.5)	Annually: Within 90 days of project implementation and annually during work plan development <i>*Crisis response projects: Quarterly</i>	3-5 hours
Tool 4: Safeguarding Self-Assessment Tool for FHI 360 Projects		
Assesses a project's level of adherence to FHI 360's minimum standards for safeguarding program participants. The tool generates a "compliance score," which serves as a benchmark at the beginning of the project and annually thereafter. (Section 4, Standard 1.6)	Annually: Within 90 days of project implementation and annually during work plan development <i>*Crisis response projects: Quarterly</i>	2-3 hours
Tool 5: Safeguarding Self-Assessment Tool for Implementing Partners		
Assesses subcontractors' and subrecipients' adherence to a set of industry standards related to safeguarding. The tool is required for implementing partners who will interact with program participants in the community, excluding TA-only projects if the scope of the TA-only project does not involve interaction with program participants in the community. (Section 4, standard 5.4)	Annually: Within 90 days of signing contract or agreement with FHI 360 and annually.	Completed by partners

How to upload completed tools to Vine:

1. In *Vine*, search for the project by name or project number, click on the project name, and click on the Safeguarding tab.
2. Click the “Upload Safeguarding Documents” tab.
 - From the pull-down menu, select the name of the tool to upload.
 - Select the applicable year.
 - Click “choose file” to find the saved file on your computer and double click on the file.
 - Ensure the name of the file appears in the box, and then click “save file” to upload.

The screenshot shows the Vine interface for a project named "Aicancar (Quality Health Initiative)". The search bar at the top contains "102537". The project details show a start date of 4/4/2019 and an end date of 4/3/2024. A navigation bar includes tabs for Project Summary, CrossCoder, Purchase Orders, SubAwards - SAT, Award Documents, PATS, SF425, Sub Audit Reports, CPAR, Safeguarding (highlighted with a red box and arrow 1), and Knowledge. Below this is another set of tabs: Instructions, Upload Safeguarding Documents (highlighted with a red box and arrow 2), and a red arrow points to the Safeguarding Documents section. The Safeguarding Documents section has a "Count: 0" and an "Upload Safeguarding Document" button. Below this is a form titled "Upload Safeguarding Documents" with a "DOCUMENT CATEGORY" dropdown set to "Vulnerability Profile Tool", a "YEAR" dropdown set to "2022", and an "UPLOAD SAFEGUARDING DOCUMENT" section with a "Choose File" button and "No file chosen" text. At the bottom are "Save File" and "Cancel" buttons. Red arrows and numbers 1 and 2 indicate the sequence of actions: 1. Click on the Safeguarding tab in the navigation bar. 2. Click on the Upload Safeguarding Documents tab. The form fields are also indicated by red arrows.



SECTION 4

HOW TO IMPLEMENT FHI 360'S MINIMUM STANDARDS

Domain 1:

Risk Assessment & Action Planning

QUICK LINKS TO RESOURCES

- Proposal template: *Technical Volume Template*
- How-to note: *Incorporating Safeguarding into Proposals, Work Plans, and Budgets*
- How-to note: *How to Implement FHI 360's Universal Anti-Trafficking Compliance Plan*
- Procedures: *FHI 360's Child Safeguarding Procedures for Projects that Involve Interaction with Children*
- Tool 1: *Vulnerability Profile Tool*
- Tool 2: *Universal Anti-Trafficking Compliance Plan* ([Arabic](#), [French](#), [Portuguese](#), [Spanish](#))
- Tool 3: *Risk Assessment & Action Planning (RAAP) Tool*
- Tool 4: *Safeguarding Self-Assessment Tool for FHI 360 Projects*

STANDARD 1.1

Include safeguarding activities in project proposals, work plans, and budgets. *Refer to how-to-note on Connect.*

- **Purpose:** To ensure safeguarding activities are included in the proposal design and budget, as well as annual work plans and budgets for awarded projects.
- **Instructions:**
 1. All FHI 360 humanitarian and development projects that involve interaction with program participants must describe how FHI 360 addresses safeguarding at the organizational level and a plan to address safeguarding at the project level in proposal narratives, work plans, and budgets, regardless of the award amount, length of the project, or whether the Notice of Funding Opportunity or other solicitation opportunity explicitly asks us to describe our safeguarding approach.

☆ RECOMMENDATION:

Proposal teams are encouraged to submit questions to “requests for information” and other pre-solicitation announcements to funders to inquire about safeguarding requirements if this information is not included in initial “Sources Sought” or other comparable documents.


2. **Proposal and project teams (for awarded projects) should refer to the how-to note on Connect, *Incorporating Safeguarding into Proposals, Work Plans, and Budgets*, which:**
 - **Describes how to quickly assess a project's level of vulnerability related to SEA** during the proposal design stage and early stages of project implementation. This tool assesses a project's vulnerability to SEA based on the (1) population(s) involved in the project, and (2) context/settings where programs and activities are implemented. Demonstrating that FHI 360 has a solid understanding of the safeguarding vulnerabilities related to a proposed project can be a differentiator and strengthen proposals, as well as help inform the safeguarding activities for awarded projects during initial work plan development.
 - **Provides standard language** and information about FHI 360's commitment to and mechanisms for safeguarding program participants that can be used for proposal narratives and work plans.
 - **Provides budget considerations** for safeguarding efforts, including but not limited to:
 - Level of effort (LOE) for [position] to serve as the project's safeguarding focal point
 - Printing costs for awareness-raising materials
 - Training for project staff, volunteers, and partners
 - Establishing a community-based complaint mechanism where needed or required
 - In-person short term technical assistance (STTA) from FHI 360's Senior Technical Advisor for Safeguarding or a Regional Safeguarding Advisor where one is in place (for high-risk projects).
3. **Responsibilities for proposal teams:**
 - **Bid justification memo (BJM):** The staff person who submits the BJM to the Bid Board should tick the box labeled "Safeguarding" (listed under "Details") in Sales Force if the project involves interaction with program participants.

☒ **Safeguarding** (The information "i" icon for this checkbox (when you hover over it) in Salesforce states: "Check the box if this project interacts directly with program participants. If yes, safeguarding must be included in the proposal narrative and budget.")
 - **Proposal Design Leads (PDLs)** ensure (1) the Vulnerability Profile Tool is completed, which could include assigning this task to a person on the proposal team that is familiar with the target populations(s) and context where activities will be implemented, and (2) safeguarding is included in either the staffing and management section when the solicitation does not include safeguarding or the technical narrative when the solicitation does include safeguarding.

- **Technical Budget Leads (TBLs)** ensure that safeguarding direct costs are included in the proposal budget.
 - **FHI 360's Senior Technical Advisor for Safeguarding** is available to provide support to proposal teams, but the standard language in the how-to note is typically sufficient for most proposals, unless the funder asks us to tailor safeguarding efforts to a particular project. In these cases, proposal teams can assign GESSI's Senior Technical Advisor for Safeguarding on the Proposal Team list, as needed.
4. **Use FHI 360's proposal template**, which includes standard language to include in all proposals for projects that involve interaction with program participants.

- *Technical Volume Template*

Safeguarding is included in the agendas for proposal manager kick-off meetings and pink and cost and pricing reviews to flag whether safeguarding needs to be included in a proposal.

 **Note:** For projects that involve interaction with program participants, it is important to include safeguarding in the proposal narrative and budget; otherwise, safeguarding integration at the beginning of project implementation is difficult, and there will be a lack of funds allocated to accomplish required activities as outlined in FHI 360's minimum standards for safeguarding program participants.



CHECKLIST FOR PROPOSAL/PROJECT TEAMS:

(FOR PROJECTS THAT INTERACT WITH PROGRAM PARTICIPANTS)

- ☐ Proposal/project team (for awarded projects) referred to the how-to note *Incorporating Safeguarding into Proposals, Work Plans, and Budgets* and included safeguarding in the proposal narrative/project work plan.
- ☐ Proposal/project team used the results of FHI 360's Safeguarding Vulnerability Profile Tool) to describe the project's vulnerabilities in the proposal narrative and to inform the project's work plan.
- ☐ Safeguarding activities were included in the proposal budget/project's annual budget.

STANDARD 1.2

Tool 1: 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*.

- **Purpose:** To quickly assess a project's level of vulnerability related to SEA based on two factors, (1) population(s) with whom the project will interact and (2) settings where programs are implemented. This tool does not aim to identify additional project-level risks. Tool 3: Risk Assessment and Action Planning (RAAP) is used for that purpose.
- **Instructions:** (*Refer to Tool 1 for additional details.*)
 1. **Review** each vulnerability statement and determine if the statement applies to the project.
 2. **Assign** the appropriate score for each statement.
 3. **The individual scores are automatically calculated** to obtain a total score.
 4. **Assign** a vulnerability rating based on the total score.

Total Score	Vulnerability Rating
2 or less	Low
3	Medium
4 or above	High

5. **Consider the vulnerability rating and total score.** The higher the score, the higher the vulnerability of sexual exploitation and other abuse toward program participants. Based on the populations involved in our projects and the settings where projects are implemented, many FHI 360 projects will likely have a vulnerability rating of "high," which is important to know, but it is also important to consider the total score (number associated with the vulnerability rating). A higher total score within the "high-risk rating" indicates that there are multiple risk factors, which compound the level of vulnerability.

6. What to do with the completed tool and how to use the results:

- **Proposal teams:** Upload completed tool to the proposal folder in SharePoint. Use the results to describe the level and types of vulnerabilities associated with a proposed project in the proposal narrative.
- **Project teams:** Upload completed tool under the “Safeguarding” tab in *Vine* and use the results to inform safeguarding activities as part of the project’s initial work plan development.

STANDARD 1.3

Tool 2: 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*.

- **Purpose:** To ensure due diligence and uniform application of FHI 360’s *Combating Trafficking in Persons (CTIP) Policy* by all personnel, including country office personnel, FHI 360 developed a written “Universal Plan,” which outlines the key elements of FHI 360’s CTIP Policy and aligns with U.S. and U.K. Government regulations and international standards related to anti-trafficking.

The Universal Plan is used as a tool to raise awareness about our CTIP Policy, including prohibited conduct and requirements that aim to prevent and mitigate risk of human trafficking at all levels of our organization.

- **Instructions:**

1. **All FHI 360 country offices** are required to put the Universal Plan in place within 90 days of opening the office.
2. **No adaptation of the Universal Plan is needed at the country office level.** It should be implemented as-is (*Refer to [Standard 1.4](#) for information about how projects need to tailor the Universal Plan*).
3. **Post hard copies** of the Universal Plan in visible locations at the country office and share electronic copies (via email) with all country-office staff.
4. **Refer** to the *how-to note* on Connect for more information.
5. The *Universal Plan* is also available in *Arabic, French, Portuguese, and Spanish*.

☆ RECOMMENDATION:

Dedicate time on the agenda for all-staff meetings to review the key elements of the Universal Plan, including prohibited conduct and how to report suspected or known trafficking-related activity.

STANDARD 1.4

Tool 2: 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.*

- **Purpose:** To ensure due diligence and uniform application of FHI 360's *CTIP Policy* at the project level, all FHI 360 projects must implement FHI 360's Universal Plan (and tailor it to address high risks where applicable), which outlines the key elements of FHI 360's CTIP Policy and aligns with U.S. and U.K. Government regulations and international standards related to anti-trafficking. The Universal Plan is used as a tool to raise awareness about our CTIP Policy, including prohibited conduct and requirements that aim to prevent human trafficking-related activity at all levels of our organization, including at the project level.
- **Instructions:**
 1. **All FHI 360 projects**, regardless of whether we are the prime or sub and regardless of the nature, size, or scope of the project, must review the Universal Plan and complete the required information (placeholders for project-specific information) included in the Universal Plan to determine whether the project is high risk and whether suppliers are required to have their own written plan in place.
 2. **Assess whether the project is high risk for human trafficking:** Projects that are larger, more complex, or involve a greater risk of trafficking activity may need to implement measures in addition to those set out in FHI 360's Universal Plan to ensure that the anti-trafficking compliance plan is appropriate to the size and complexity of the project, and the nature and scope of the activities to be performed. Therefore:
 - Projects must use the criteria outlined in the Universal Plan to determine if the project is high risk, and if so, develop additional measures in a *Supplemental Plan for High-Risk Projects* ("Supplemental Plan") and include these additional measures in Section 4 of the Universal Plan, if applicable. (See *Annex 1* for illustrative supplemental measures.)
 - When required by a funder to have a written plan in place (pre-award), including an assessment to determine if a Supplemental Plan is needed for the project, the proposal team can use the criteria outlined in the Universal Plan to assess whether the project is high risk, and if so, identify supplemental measures during the proposal design stage.
 - When an assessment and Supplemental Plan are not required by a funder (pre-award), the assessment should occur (using the criteria outlined in the Universal Plan) and a Supplemental Plan should be developed, where needed, within 90 days of project implementation during the project's initial work plan development.

3. **Suppliers:** Suppliers are only required to maintain their own written anti-trafficking compliance plans when required by a funder.
 - Project teams should seek assistance from the point of contact for their proposal (pre-award) or contract/agreement (post-award) to determine if a project's suppliers need to have their own written anti-trafficking compliance plans in place.
 - 📄 **Note:** In most cases, suppliers are not required to have their own written plan in place; however, when we are the prime, our safeguarding policies, including the CTIP Policy, still flow down and apply to suppliers. As described in Domain 5, there are several ways we flow down our safeguarding policies to suppliers (e.g., Terms and Conditions of sub-agreements, subcontracts, and vendor purchase orders; inviting partner staff to participate in FHI 360 safeguarding training; monitoring and evaluation.)
 - Even though the supplier may not be required to have their own written plan in place, and we are not required to flow down FHI 360's written Universal Plan, we **are** required to ensure suppliers understand the content, which aligns with FHI 360's CTIP Policy.
4. **Certifications:** Where required by a funder, FHI 360 will sign and submit certifications for projects as required by applicable regulations and contractual provisions. When funders request anti-trafficking certifications, project teams should coordinate with the point of contact for their proposal (pre-award) or contract/agreement (post-award) to obtain the required signature for submission to the funder. If a mission or funder reaches out directly to a project team, the project team should contact the project's point of contact for FHI 360's contract/agreement to coordinate.
5. **What to do with the Universal Plan:** Projects must post hard copies of the Universal Plan in visible locations at project offices and share electronic copies (via email) with all project staff. Projects that tailor the Universal Plan to include supplemental measures must post project-specific compliance plans at all project workplaces and sites, except where the project's work is not being performed at a fixed location.
6. **Refer** to the *how-to-note* on Connect for more information.
7. **Upload** completed plan to Vine (under the project's "Safeguarding" tab): [Vine.fhi360.org](https://vine.fhi360.org)
8. The [Universal Plan](#) is also available in [Arabic](#), [French](#), [Portuguese](#), and [Spanish](#).

☆ **RECOMMENDATION:**

Dedicate time on the agenda at project staff meetings to review the key elements of the Universal Plan, including prohibited conduct and how to report suspected or known trafficking-related activity.

STANDARD 1.5

Tool 3: 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). Upload completed tool under the Safeguarding tab in *Vine*.

- **Purpose:** To review common risk factors (conditions that increase likelihood of SEA/other harm), determine which risk factors apply to a project, review illustrative mitigation strategies, and identify actions to address the identified risk factors.

Note: The RAAP tool includes a 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.

- **Instructions:** (*Refer to Tool 3 for additional details.*)
 1. **Convene** relevant project staff to review the RAAP tool, including project staff who understand the populations served, the context where the project is implemented, and the nature of activities. Where relevant, involve key implementing partner staff in the review of potential risk factors and the development of actions to address any identified risk factors.
 2. **Review** the risk definitions and risks included at the top of the page of the tool.
 3. **Risk assessment:** Review the risk factors for each risk area and tick "yes" or "no" from the pull-down menu to indicate whether the risk factor is relevant to the project. Additional risk factors can be added at the bottom of this tool in the section titled "Other Risk Factors."

The risk factors listed in the tool are organized under the following risk areas:

- Programs/services (including populations)
 - External environment
 - Human resources
 - Suppliers/partners
 - Media/communication
 - Other risk factors
4. **Action plan:** Focus on the risk factors that apply to the project (these should automatically appear in "red" when ticked "yes"). Then refer to the example prevention/mitigation strategies listed in the tool and describe the actions that will be taken to address identified risk factors, by whom, and by when. This is the

action plan. Projects can create a collective set of actions for each risk area as opposed to identifying an action for each individual risk factor; however, the actions should address all identified risk factors.

5. **Review the completed RAAP tool** during a project staff meeting so all project staff are aware of identified risk factors and the planned actions to address them.
6. **Implement** the action plan.
7. **Upload** completed RAAP Tool to Vine (under the project's "Safeguarding" tab): [Vine.fhi360.org](https://vine.fhi360.org)
8. **Refer** to the completed tool regularly to ensure the identified actions are being implemented.

ANNEX 3: SAFEGUARDING IN COMMUNICATIONS

Risk factors and illustrative mitigation strategies related to communications activities are listed in the RAAP tool. [Annex 3](#) includes FHI 360's full set of requirements related to safeguarding program participants during the collection and use of photos, stories, videos, and other media. Ensure all project personnel understand the requirements included in Annex 3.

STANDARD 1.6

Tool 4: 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*.

- **Purpose:** To assess a project's level of adherence to FHI 360's minimum standards for safeguarding program participants. The tool generates a "compliance score," which serves as a benchmark at the beginning of the project and annually thereafter.
- **Instructions:** (*Refer to Tool 4 for additional details.*)
 1. **Review** each standard and the information listed in the "Verification" column. Engage relevant staff to determine the status of each standard:
 - 0 = not implemented
 - 1 = partially implemented
 - 2 = fully implemented
 - NA = not applicable

2. **For each standard**, from the pull-down menu in the "Status" column, choose the option that reflects the project's status for each standard. The compliance score for each standard will automatically be totaled, resulting in a "Total % Compliance" for each of the eight domains. These eight domain scores will also be automatically totaled, resulting in an "Overall Compliance" score at the bottom of the tool, as well as in the Summary at the top of the page.

⚠ Important: Do not skip applying a score to EACH standard; the status must be selected for every standard to obtain an accurate overall compliance score.

3. **In the "Comments/Notes for Follow-Up" column**, include notes for any follow-up steps that will be taken for standards that are either partially implemented or not implemented.
4. **Upload** completed tool to Vine (under the "Safeguarding" tab): [Vine.fhi360.org](https://vine.fhi360.org)

Domain 1 Reminders

Remember to upload the following completed tools under the Safeguarding tab in Vine.

1. Vulnerability Profile Tool
2. Universal Anti-Trafficking Plan (project level)
3. Risk Assessment & Action Planning (RAAP) Tool
4. Safeguarding Self-Assessment Tool for FHI 360 projects

Domain 2

Safe Recruitment & Hiring

QUICK LINKS TO RESOURCES

- *Interview Questions for Hiring Managers and Interview Teams*
- *Candidate Interview Evaluation Form*
- *FHI 360 Professional Reference Check Form*
- FHI 360's mandatory e-module: *Safeguarding Program Participants*

STANDARD 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.

- **Purpose:** To explore how candidates' values and beliefs align, or do not align, with FHI 360's values and commitments related to safe and respectful work environments and programs.

CROSS REFERENCE:

Refer to Section 8.4.1 of *FHI 360's Child Safeguarding Procedures for Projects that Involve Interaction with Children* for additional information about recruitment and hiring for positions that will involve interaction with children.

- **Instructions:**
 1. **Hiring managers and other project staff who are responsible for hiring staff and consultants and recruiting volunteers need to integrate standardized safeguarding questions** into the interview process for all candidates. Additional specific questions for candidates who will work with program participants must be asked to further assess the candidate's values and how they align (or don't align) with FHI 360's organizational values, commitments, and practices.
 2. **Below are two standardized questions** that need to be asked of all FHI 360 candidates by the interview committee, regardless of the position. These questions can be found in FHI 360's *Interview Questions for Hiring Managers and Interview Teams*.

Standardized Questions (Choose #1 or #2)

Interview question #1: *FHI 360 has a set of policies in place that strictly prohibit any form of harassment and abuse in all our work environments, against staff, as well as harm toward program participants, including children. Everyone plays a role in safeguarding program participants.*

- *Have you worked for an organization that had a policy that prohibited any form of harassment and abuse in all work environments, against staff, as well as harm toward program participants, including children?*
- *How did you see this lived out in the organization's work?*
- *Without revealing identifying information, have you ever reported a safeguarding-related matter concerning a colleague — and if so, was it handled in the manner you expected?*

Interview question #2: *In position [X], what do you see as your role in ensuring program participants are safe from sexual exploitation and other forms of abuse within our programs — and what might that look like?*

3. **Question for HR recruiters and HR representative to ask all candidates:** *Have you ever been found in violation of safeguarding policies or codes of conduct with a current or previous employer? If so, what policies and what was the outcome?*
4. **Candidate Interview Evaluation Form:** This form is completed by each interviewer in Workday after the interview; if the interviewer is on an interview panel, each person on the panel must submit their individual feedback via the Interview Evaluation Form in Workday for each candidate they interview. If a person does not have access to Workday, they must submit their completed Interview Evaluation Form to the HR recruiter via email. **As per FHI 360's Recruiting Policy (POL 03025), all staff members participating in the interview process are required to provide written feedback prior to a job offer being made.**

The *Candidate Interview Evaluation Form* includes the following section:

Safeguarding: If interaction with program participants, including children, is involved in this work, then respond to how the candidate responded to your related questions. (*Refer to the standardized questions listed above*).

STANDARD 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 *Professional Reference Check Form*.

- **Purpose:** To avoid hiring personnel with known histories of violence or other misconduct towards staff or program participants.
- **Instructions:**
 1. **A criminal background check** must be conducted and documented by the local HR representative, or if none, by project hiring staff. The information obtained through the criminal background check should be treated with strict confidentiality. When a criminal background check is not possible due to the absence of a national criminal records system or corrupt/unreliable police records, additional references (beyond the minimum two) from previous employers must be obtained.
 2. **Ideally three reference checks will be completed on the finalist candidate(s), with a minimum of at least two completed reference checks;** two of the three reference checks should ideally be with prior managers. Reference checks must be conducted by HR, or by the person responsible for HR functions when HR is not available, on candidates to review how their previous experience matches the requirements for the role, as well as verify their compliance with ethics and conduct with program participants. At a minimum, the following question must be asked during all reference checks:

Reference Question: *Do you have any concerns regarding this candidate's ability to maintain a safe, harassment- and violence-free work environment?*

The question above is included in the FHI 360 *Professional Reference Check Form*.

FHI 360 must never hire anyone with a history of sexual exploitation and abuse or other misconduct toward program participants whether the information is self-disclosed during an interview or verified through third parties during reference or other background checks.

STANDARD 2.3

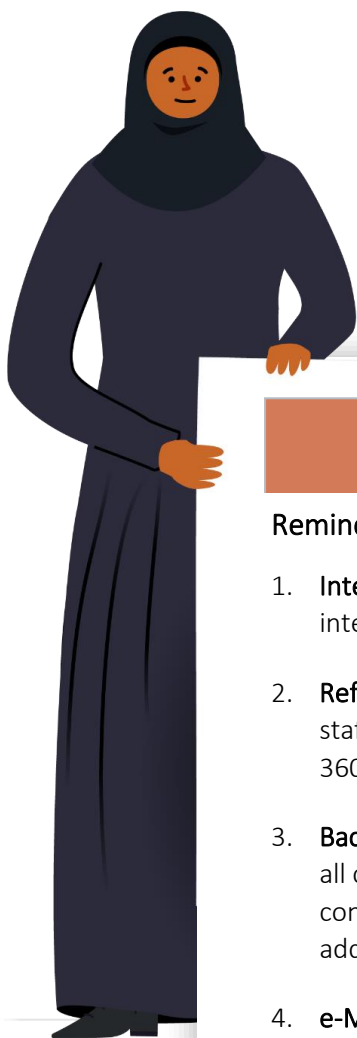
Ensure FHI 360 staff complete required online e-module *Safeguarding Program Participants* within 30 days of hire.

- **Purpose:** To ensure uniform application of FHI 360's safeguarding policies and understanding of different types of abuse, safeguarding-related risks, reporting requirements, and how to access FHI 360 reporting mechanisms.
- **Instructions:**
 1. **To access the e-module on Learns:**
 - Click *here* and click "Enroll."
 - Login to Learns by clicking the "Login with Single Sign-on" button.
 - Follow the prompts to launch the training.
 - Once you've launched the training, select the language you prefer. The e-module is available in Arabic, English, French, Portuguese, and Spanish.

- After enrolling, employees can access it anytime from the Learning Dashboard in *Learns*.
- For technical assistance, please contact *Information Solutions and Services*.

Tip: If you start the training and do not finish it in one sitting, do not re-enroll. When you come back to finish the training, access the e-module from your Dashboard.

2. **HR representatives** at the country office or project level are responsible for tracking staff completion of the e-module within 30 days of hire. HR representatives can track this in Workday or through the support of the *Employee Service Center (ESC)* who also has access to these reports. A ticket can be submitted to the ESC for support with retrieving a report from Workday. For staff who do not have access to the internet or are otherwise unable to complete the e-module (e.g., due to language barriers), local HR representatives can contact FHI 360's senior technical advisor for safeguarding to obtain a PowerPoint version of the training, which can be delivered to new staff during an in-person or virtual orientation session.



Domain 2 Reminders

Reminders for safeguarding in our human resources practices:

1. **Interviews:** Include FHI 360's standard safeguarding-related questions in interviews with all candidates.
2. **References:** Check and document references for all candidates, including staff, volunteers, incentivized workers, and consultants using FHI 360's FHI 360's standard reference check form.
3. **Background Checks:** Conduct and document criminal background checks for all candidates, including staff, volunteers, incentivized workers, and consultants. If no system exists for criminal background checks, check additional references.
4. **e-Module:** Ensure all staff complete the mandatory e-module *Safeguarding Program Participants* within 30 days of hire.

Domain 3

Safeguarding Focal Points

QUICK LINKS TO RESOURCES

- How-to note: *How to Identify Safeguarding Focal Points*

STANDARD 3.1

Identify a safeguarding focal point to support safeguarding activities.

- **Purpose:** To support project directors/COPs in ensuring safeguarding is prioritized and well-integrated at the project level.
- **Instructions:**
 1. **Project directors/COPs identify** an existing staff person to serve as the SFP within 90 days of project implementation. The name of the SFP needs to be shared with FHI 360's *Senior Technical Advisor for Safeguarding* to ensure the SFP is invited to the next training of trainers for newly appointed SFPs.

Project directors/COPs are accountable for ensuring safeguarding is well integrated at the project level. SFPs play an important role in supporting these efforts.
 2. **What are the main responsibilities of SFPs?** The role of SFPs is typically taken on by existing staff who are selected by a COP, project director, country representative, or country director because they have interest and/or skills to support the integration and monitoring of safeguarding activities. In general, SFPs will coordinate with project directors/COPs and other project staff to implement FHI 360's *minimum standards for safeguarding program participants*, including:
 - Support the completion of required tools (Tools 1–5).
 - Train project staff, volunteers, partners.
 - Establish community-based complaint mechanisms (CBCMs), where needed or required.
 - Work with project staff to increase awareness among program participants about how to report harm.
 - Support complaints from program participants, including making referrals.
 - Liaise with OCIA to coordinate in-country investigations (not investigating cases!)
 - Participate in inter-agency coordination and regular meetings with regional FHI 360 SFPs to build knowledge and share information.

Although SFPs focus on safeguarding program participants, specifically, they could be asked to coordinate with the HR representative to support training or other efforts related to safeguarding in our work environments.

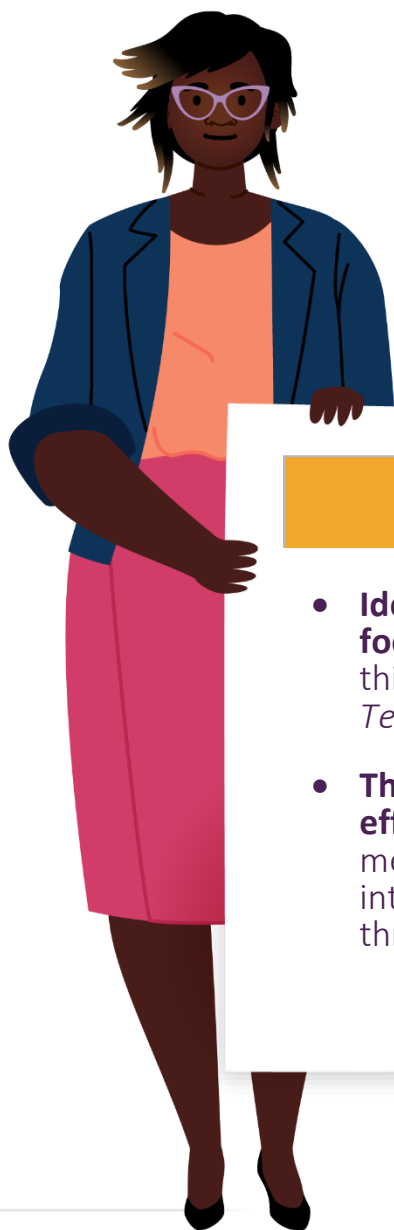
3. Who should be selected as an SFP?

- Projects that involve interaction with program participants are required to identify a project level safeguarding focal point (SFP). Project level SFPs are selected by project directors/COPs and are typically people in technical/program roles (e.g., gender or other technical specialists, GESSI champions, technical officers, technical advisors, capacity-building officers/specialists) who have interest, skills and experience related to safeguarding, gender equality and social inclusion, violence prevention, protection, or other related technical areas; or have experience facilitating training.
- SFPs should be knowledgeable of project activities and be in positions to ensure safeguarding integration at the project level.
- Country directors/ reps may also choose to select a country office SFP to coordinate and support project-level SFPs, which is an approach sometimes used for large country offices with a large project portfolio. Country directors/ reps should consider the size, nature, and scope of the country office and project portfolio to determine if a country office SFP is needed. HR representatives are sometimes selected as country office SFPs to support project level SFPs. Note that HR representatives and other country office staff are not always closely connected to the needs of program participants or specific risks at the project level, so if country directors/ reps decide to identify the HR representative or other country office staff as the country office SFP, additional project level SFPs need to be identified. Typically, when an HR representative or other country office staff are selected as the country office SFP, this person coordinates efforts among project level SFPs, which can be helpful for large country offices with a large project portfolio.

4. How much LOE is needed for SFPs? The LOE needed for SFPs depends on the nature, size, and scope of the project. Below is some general guidance:

- SFPs for projects being implemented in development settings typically dedicate 5–15% of their time to this role, depending on the nature, size, and scope of the project.
- SFPs for crisis response projects, projects being implemented in humanitarian settings, or large projects that involve direct services to populations at high risk of SEA (e.g., children, women, LGBTQ+ people, refugees, people with disabilities) and/or are being implemented in high-risk settings (e.g., education program for youth in school settings or health care services to women and girls in clinics or drop-in centers in development settings) may need increased LOE (beyond 15%).
- LOE for SFPs and costs related to safeguarding activities (e.g., training for staff and partners) should be included in the project's budget or shared across multiple project budgets if the SFP supports multiple projects.

5. **How will SFPs receive support and additional training?** FHI 360's *Senior Technical Advisor for Safeguarding* is available to provide direct support and training to identified SFPs who will in turn strengthen the capacity of country office and project staff, volunteers, and implementing partner personnel. The senior technical advisor can provide remote support and in-person STTA to country office and project teams, where possible. Note, in most cases, in-person STTA must be covered by the project's budget. If STTA is needed and project funds are not available, reach out to the senior technical advisor for safeguarding to explore options.



Domain 3 Reminders

- **Identify a project level safeguarding focal point (SFP)** and share the name of this person with FHI 360's *Senior Technical Advisor for Safeguarding*.
- **The SFP will champion safeguarding efforts** and support the project with meeting the minimum standards and integrating safeguarding measures throughout the project.

Domain 4

Safeguarding/PSEA Networks

QUICK LINKS TO RESOURCES

- [UN IASC Dashboard](#)

STANDARD 4.1

Where one exists, participate in the in-country inter-agency Safeguarding/PSEA network. Refer to the [UN IASC Dashboard](#).

- **Purpose:** To ensure that FHI 360-supported projects that involve interaction with program participants in the community are connected to and actively participating in any inter-agency PSEA coordination in settings where our projects are implemented.

- **Instructions:**

1. **Explore** if an in-country inter-agency PSEA network exists in the setting where the FHI 360-supported project is operating and implementing activities.
2. **How do I find out if a PSEA network exists in my country?**
The [IASC Global Dashboard](#) includes key information about in-country interagency efforts related to PSEA, including key accomplishments, the in-country PSEA action plan, members, contact information for the PSEA network coordinator, common types of complaint channels used in each country, and referral pathways.
3. **If an inter-agency PSEA network exists**, the FHI 360 project team needs to contact the PSEA coordinator to request participation in the network, including being included on emails for upcoming meetings, information sharing, etc.

The Interagency-Standing Committee (IASC) provides global support and coordination among countries that are at high risk of SEA. Although many of the prioritized countries are experiencing a current or recent humanitarian crisis, some prioritized countries include non-emergency or development settings. The prioritized countries often have in-country inter-agency PSEA networks, which are typically co-chaired by UN agencies and NGOs, as well as a PSEA coordinator who is responsible for supporting the PSEA network.

Domain 5: Supplier Agreements & Monitoring


QUICK LINKS TO RESOURCES

- Standard clauses in FHI 360's Terms and Conditions
 - Subcontracts: *Document Preview – FHI 360 Subcontract Terms and Conditions*
 - Sub Agreements/Grants: *Document Preview – FHI 360 Grant Terms and Conditions*
 - Consultant Agreements: *Business opportunities | FHI 360*
 - Vendor Purchase Orders: *Business opportunities | FHI 360*
- Contracts Management Services: *Contracts Management Services (CMS)*
- E-module, *Safeguarding Program Participants*, for suppliers: academy.fhi360.org
- Tool 5: *Safeguarding Self-Assessment Tool for Implementing Partners*

STANDARD 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.

- **Purpose:** To ensure that FHI 360's safeguarding policies and other requirements flow to downstream suppliers, including subcontractors, subrecipients, consultants, and vendors, as well as suppliers' downstream partners.
- **Instructions:**
 1. **Ensure** that the most up-to-date standard clauses are included in all subcontracts, sub agreements, consultant agreements, and vendor purchase orders.
 2. **Use** the most current FHI 360's Terms and Conditions templates. Standard clauses and templates are periodically updated to align with FHI 360's policies, funder requirements, and international standards. It is important for project teams to use the most current templates on Connect to ensure these requirements are accurately cascaded to our suppliers.

 **Important:** Do not use previously saved Terms and Conditions templates that were used for other subcontracts, sub agreements, consultant agreements, or purchase orders. Always pull the templates from Connect to ensure you are using the most up-to-date versions.

3. **Access** the most up-to-date templates on Connect:

- Subcontracts: *Document Preview – FHI 360 Subcontract Terms and Conditions*
- Sub agreements/grants: *Document Preview – FHI 360 Grant Terms and Conditions*
- Purchase orders: *Business opportunities | FHI 360*
- Consultant agreements: *Business opportunities | FHI 360*

STANDARD 5.2


Conduct a briefing with suppliers that interact with or have exposure to 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.

- **Purpose:** To ensure that FHI 360 suppliers understand the safeguarding-related requirements in the Terms and Conditions of their subcontracts, sub agreements, consultant agreements, and vendor purchase orders.
- **Instructions:**
 1. **Conduct** a virtual or in-person briefing with the supplier's point of contact once the subcontract or sub agreement is ready to be signed to provide an overview of the safeguarding-related sections in the subcontract, sub agreement, or purchase order. This briefing can be integrated into a broader kick-off meeting or other similar meeting with the supplier/partner.
 2. **The briefing** should include an overview of the following requirements as outlined in the Terms and Conditions of their subcontract, sub agreement, or purchase order:
 - Adhering to key elements of FHI 360's:
 - Safeguarding of children policy
 - Protecting program participants from sexual exploitation and abuse policy
 - Combating trafficking in persons policy
 - Reporting suspected or known harm toward program participants.
 - Escalating complaints to and utilizing FHI 360's reporting mechanisms.
 - Taking steps to uphold the principles of and prevent conduct that violates FHI 360's safeguarding policies.



Note: Although FHI 360 does not dictate *how* suppliers do this, during this briefing, the project team needs to share the link to FHI 360's e-module, *Safeguarding Program Participants*, accessible at academy.fhi360.org. This e-module is a resource to help suppliers cascade FHI 360 safeguarding-related requirements to their own personnel. (See [Section 5.3](#) for additional information related to the e-module for suppliers.)

- Taking steps to ensure that no individual with any history of crimes against children or other safeguarding-related incidents with previous employers will be hired as part of the work under an FHI 360 subcontract, sub agreement, or purchase order.

 **Note:** Although FHI 360 does not dictate *how* suppliers do this, the following industry standards include (1) conducting reference checks with previous employers to determine if the candidate has a history of substantiated misconduct related to harassment, sexual exploitation, or other abuse toward staff or program participants, (2) conducting criminal background checks, where possible, to determine if a candidate has a history of sexual exploitation or other abuse, and (3) asking interview questions to explore if a candidate's beliefs and values align with (or don't align with) basic human rights, as well as the *IASC's six core principles relating to sexual exploitation and abuse*. These industry standards are also included in the *Safeguarding Self-Assessment Tool for Implementing Partners*. (See [Section 5.4](#) for more information about this tool.)

3. Document the briefing via a brief memo to file. (See [Annex 4](#))

STANDARD 5.3

Share FHI 360's e-module "*Safeguarding Program Participants*" with suppliers that have interaction 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.


- **Purpose:** To ensure that key safeguarding-related information and requirements are cascaded to supplier personnel. Although FHI 360 does not require supplier personnel to complete this e-module, per the standard safeguarding clauses in the Terms and Conditions, suppliers *are* required to ensure they cascade requirements to their own personnel. This e-module is made available to suppliers to help them meet this requirement.
- **Instructions:**
 1. **Although not required** per suppliers' subcontract, sub agreement, or purchase order, partners can use FHI 360's e-module, *Safeguarding Program Participants*, as a resource to help them cascade key information to their own personnel.
 2. **Suppliers are responsible for tracking** their own staff completions of the e-module.

3. Provide the following instructions to suppliers:

- To access the safeguarding e-module:
 - Go to: academy.fhi360.org
 - New users: Click the option to create a user account.
 - Sign in and go to your dashboard.
 - Click to launch the Safeguarding Program Participants training.
 - Users will be prompted to answer questions such as name, email, country, whether they are affiliated with an FHI 360 project, and if so, the name of the project.
 - Click to enter the e-module, which is available in Arabic, English, French, Portuguese, and Spanish.
 - Read and click through the training slides and follow all instructions, including links to review additional information throughout.
 - At the end, you will be prompted to exit the course. Once you exit the course, go to your dashboard and you can “view certificate” to download a copy.
 - Please send questions to kdixon@fhi360.org

STANDARD 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*.

- **Purpose:** To assist FHI 360’s implementing partners to assess adherence to a set of industry standards for safeguarding program participants. When the standards are effectively and fully implemented, it is an indication that an organization has taken important steps to establish internal controls to address SEA, mitigating the risk of harm toward program participants. The standards in this tool align with *FHI 360’s safeguarding policies*, major funder requirements, and international safeguarding standards.⁸
 - **Instructions:**
 1. **Which FHI 360 partners are required to complete this tool?** This tool is required for FHI 360 subcontractors or subrecipients that interact with, implement programs with, or deliver services to program participants in communities.
-  **Note:** Subcontractors and subrecipients involved in TA-only projects that do not involve interaction with program participants in the community as part of the project’s scope of work are not required to complete this self-assessment tool. However, this tool can still be shared with organizations when we are providing TA to

⁸ This tool is adapted from the *United Nations Implementing Partner PSEA Capacity Assessment* and aligns with *FHI 360’s policies*, major funder requirements, and international standards for safeguarding program participants.

help those organizations understand industry standards related to safeguarding program participants.

2. **When does the tool need to be completed?** This tool must be completed by implementing partners within 90 days of contract/agreement signing with FHI 360 and annually thereafter to ensure ongoing adherence to and progress toward meeting the industry standards outlined in this tool. For partners that work on multiple FHI 360-supported projects, the same completed tool can be submitted for all relevant FHI 360 projects.
3. **How do implementing partners complete the tool? (Instructions are also listed in the tool.)**
 - For each standard listed in the tool, tick “yes” if the standard is fully met. Tick “no” if the standard is not fully met.
 - Under “Means of Verification,” tick the boxes that apply and/or describe other means of verification.
 - Manually add up the points to obtain a total score (up to 9 points possible).
 - Determine the project’s “adherence rating” based on the total score (full, medium, low), and enter the total score and adherence rating at the end of the tool.
 - Submit completed tool to the FHI 360 point of contract for the project.
4. **How to use the results?**
 - The tool will produce a total score and “adherence rating” (low, medium, high). Although a low adherence rating does not mean that FHI 360 will not partner with an organization, it serves as a benchmark and an opportunity to understand areas that need to be strengthened within a partner organization related to safeguarding.
 - FHI 360’s implementing partners should use results to identify and address gaps and include updates in any progress reports submitted to FHI 360, where applicable.
 - Where possible, FHI 360 may share information, tools, and resources to help implementing partners strengthen their organizational capacity, but partners are responsible for strengthening their own internal prevention, mitigation, and response measures.
 - FHI 360 project teams need to include the industry standards listed in the tool in the project’s monitoring plan and follow-up with partners during monitoring activities to ensure actions have been taken to address any gaps. (*See Section 5.6*)
 - FHI 360 may decide to discontinue its partnership with an organization that continues to maintain a “low” adherence score. In such cases, the FHI 360 project director/COP should consult and coordinate with FHI 360 regional leaders and their Contract Management Services (CMS) point of contact.
5. **Upload** the completed tool to *Vine* under the “Safeguarding” tab for the project. (In *Vine*, search for the project by name or project number, click on the project, and click on the Safeguarding tab to upload completed tools.)

STANDARD 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 safeguarding requirements included in the *Safeguarding Self-Assessment Tool for Implementing Partners* in any progress reports to FHI 360.

- **Purpose:** To receive updates on partners' progress toward meeting the industry standards that are outlined in the *Safeguarding Self-Assessment Tool for Implementing Partners* (see Section 5.4)
- **Instructions:**
 1. **For projects that require progress reports from** subcontractors and/or sub recipients, include a section in the progress report template that asks partners to provide updates on their progress toward meeting the industry standards that are outlined in the *Safeguarding Self-Assessment Tool for Implementing Partners*.

Example question for progress report template: *What progress has been made toward meeting the industry standards related to safeguarding program participants as outlined in FHI 360's Safeguarding Self-Assessment Tool for Implementing Partners?*

STANDARD 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)

- **Purpose:** To ensure subcontractors and subrecipients who interact with program participants adhere to the requirements outlined in the Terms and Conditions of their subcontracts or sub agreements and to support them in establishing and implementing prevention, mitigation, and response systems that align with industry standards related to safeguarding program participants.
- **Instructions:**
 1. **Integrate** the industry standards outlined in the *Safeguarding Self-Assessment Tool for Implementing Partners* into the project's monitoring plan for subcontractors and sub recipients that interact with program participants. (See Section 5.4 for more information about this tool.)



Domain 5 Reminders

- Include FHI 360's standard safeguarding-related clauses in the Terms and Conditions of all subcontracts, agreements, and purchase orders.
- Conduct briefings with suppliers that interact with program participants to review safeguarding requirements in the Terms and Conditions, and document via a memo to file.
- Share the link to FHI 360's e-module at academy.fhi360.org with suppliers/partners that interact with program participants.
- Facilitate the completion of our Safeguarding Self-Assessment Tool for Implementing Partners who interact with program participants.
- When progress reports are required, ensure partners provide updates about their progress toward meeting safeguarding industry standards.
- Monitor partners' adherence to the safeguarding industry standards that are outlined in the *Safeguarding Self-Assessment Tool for Implementing Partners* (e.g., include the standards in the project's monitoring plan)

Domain 6:

Training & Capacity Strengthening

QUICK LINKS TO RESOURCES

- FHI 360's in-depth training module: *Safeguarding Program Participants: Building Core Knowledge*
- FHI 360's *Code of Conduct for Volunteers, Incentivized Workers, and other Non-Staff*
- How-to note: *Implementing the Code of Conduct for Volunteers, Incentivized Workers, and other Non-Staff*

STANDARD 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.

- **Purpose:** To go beyond the mandatory e-module (induction training) and help facilitate a deeper understanding of safeguarding-related risks, power dynamics that contribute to SEA and other abuse, prohibited conduct, reporting mechanisms, and how to respond to disclosure of harm toward program participants.
- **Instructions:**
 1. Because the mandatory e-module during new staff orientation (described in Section 2.3 above) is an overview, projects that involve interaction with program participants need to deliver additional training to project personnel, including partner personnel that interact with program participants.
 2. Safeguarding focal points can adapt and deliver FHI 360's training module *Safeguarding Program Participants: Building Core Knowledge* at the beginning of the project once most staff are onboarded and via refresher trainings, as needed. Safeguarding focal points can engage other project staff to co-facilitate the training as appropriate. The training was originally designed to be delivered virtually, but it can be adapted for in-person training, as needed. It is also available in *Arabic, French, Portuguese, and Spanish*.

3. What is covered in this training module?

- What is safeguarding?
 - What is motivating FHI 360 to increase efforts around safeguarding?
 - Connection between power dynamics and exploitation and abuse
 - Risk factors that increase vulnerability to sexual exploitation and other abuse
 - Key elements of FHI 360's safeguarding policies
 - Using a survivor-centered approach and responding to disclosures of misconduct toward program participants
 - How to report suspected or known harm against program participants
 - Barriers to reporting for program participants
 - Establishing community-based complaint mechanisms (brief introduction)
 - Raising awareness among program participants about their rights and how to report if they have been harmed
4. **Use** sign-in sheets where possible and maintain a record of attendees for all virtual and in-person training held with FHI 360 personnel and partner personnel and keep this documentation on file.
 5. **Deliver** refresher trainings as needed, especially as new staff and/or partners join the project.

STANDARD 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.

- **Purpose:** To ensure that all volunteers, incentivized workers, and other non-staff are aware of FHI 360's zero tolerance for misconduct toward program participants and key elements of our safeguarding policies, including prohibited conduct and how to access reporting mechanisms.
- **Instructions:**
 1. **Orient** all project volunteers, incentivized workers (non-staff who receive a stipend), and other non-staff to *FHI 360's Code of Conduct for Volunteers, Incentivized Workers, and other Non-Staff*. Available in Arabic, French, Portuguese, and Spanish.
 2. **Review** the how-to note, *Implementing the Code of Conduct for Volunteers, Incentivized Workers, and other Non-Staff Working on Behalf of FHI 360*. Available in Arabic, French, Portuguese, and Spanish.

- **Identify** areas of the project where volunteers and other non-staff working on behalf of FHI 360 are interacting with communities and/or program participants. This includes individuals reporting directly to the FHI 360 project team as well as individuals working with sub-awardees, suppliers, and other partners.
- **Determine** whether the Code needs to be translated into local languages. If an additional language (beyond Arabic, French, Spanish, and Portuguese) is needed, get it translated (and back translated to ensure quality of the translation). Share translations with colleagues on other teams in your region or country to avoid multiple teams duplicating efforts. Share any new translations with FHI 360's Senior Technical Advisor for Safeguarding so that we can keep a master copy of various languages to avoid duplicating work.
- **Plan** events to gather volunteers, incentivized workers, and other non-staff for an information session in which the Code is explained and discussed in detail. Coordinate with sub-awardees to include volunteers, incentivized workers, and other non-staff that they have engaged to work on any FHI 360-supported project.
- **Review** all aspects of the Code during the information sessions, including what it means for them to sign it. Their signature is a pledge to uphold all rules of the Code, and those who break the rules will face consequences, ranging from dismissal to criminal prosecution.
 - Project staff must first learn and understand the Code themselves so that they can effectively facilitate discussion of it with others during the information sessions.
 - Print enough copies of the Code for all to sign during the information session.
- **Upon completion of the information session**, all volunteers, incentivized workers, and non-staff working on behalf of FHI 360 must sign the Code. All forms must be co-signed by a witness. Anyone refusing to sign the Code may be offered additional discussion about their concerns, but ultimately, those who will not sign the Code may NOT work on any FHI 360-supported project.
- **Collect** the signed forms, create a log of the names of those who have signed, and then store the signed copies in a secure location within the project office.
- **Repeat** this process with new volunteers, incentivized workers, or non-staff as they are brought on to the project.
- **Ensure** that the Code is reviewed with all parties at least annually.

Domain 6 Reminders

- Provide in-depth training to FHI 360 personnel and partner personnel using FHI 360's core training module.
- Orient volunteers, incentivized workers, and other non-staff to FHI 360's Code of Conduct for Volunteers, Incentivized Workers, and other Non-Staff.

Domain 7:

Reporting & Responding to Complaints

QUICK LINKS TO RESOURCES

- *How to make a report*
- *OCIA's Safeguarding Incident Form*
- *How-to note: Quick Tips: Responding to disclosures of SEA and other misconduct toward program participants*
- *Training module: Quick Tips: Responding to disclosures of SEA and other misconduct toward program participants*
- *Training module: Establishing Community-Based Complaint Mechanisms*

STANDARD 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.

- **Purpose:** To quickly and effectively identify misconduct toward program participants and escalate information to FHI 360's trained investigators for further follow-up.
- **Instructions:**
 1. **FHI 360 personnel are required to report** suspected or known harm toward program participants through one of the following means:
 - Immediate supervisor, or, if the conduct involves the immediate supervisor, any other supervisor within their department
 - FHI 360 local HR representative or regional or departmental HR Partner
 - FHI 360 Director of HR Partnering Useetha Rhodes at URhodes@fhi360.org or Chief Human Resources Officer Pam Myers at pmyers@fhi360.org
 - FHI 360 Office of Compliance and Internal Audit (OCIA) via email at Compliance@fhi360.org
 - OCIA's reporting website either with your name or anonymously <http://www.fhi360.org/anonreportregistry>
 - FHI 360 OCIA's Ethics and Compliance Hotline:
 - 1 800 461 9330 in the U.S.
 - +1 720 514 4400 outside the U.S.
 - Skype: +1 800 461 9300
 - Country-specific hotline number listed on FHI 360's [reporting website](#)

2. **Partner personnel are required to report directly to OCIA using one of the following means:**

- FHI 360 OCIA via email at Compliance@fhi360.org
- OCIA's reporting website either with your name or anonymously <http://www.fhi360.org/anonreportregistry>
- FHI 360 OCIA's Ethics and Compliance Hotline:
 - 1 800 461 9330 in the U.S.
 - +1 720 514 4400 outside the U.S.
 - Skype: +1 800 461 9300
 - Country-specific hotline numbers listed on FHI 360's [reporting website](#)

HR representatives, supervisors, directors and other positions above director level: Any FHI 360 employee who is a supervisor, HR representative, or holds a position at director level or above is required to *report directly* to HQ HR or OCIA within 24 hours any actual or suspected discrimination, harassment (including sexual harassment), exploitation, violence, or other abuse or retaliation that they observe or that is reported to them.

3. **You do not need proof of misconduct.** You must report *suspected or known* harm toward program participants. This includes rumors. You do not need all the facts to make a report.

When in doubt, it is better to report promptly so FHI 360's trained investigators (HQ HR and OCIA) can assess and investigate.

4. **Anonymous reports** are more difficult to investigate due to limited information. If an anonymous report is made, personnel are encouraged to provide as much detailed information as possible about the misconduct, including, if possible, identifying people who were involved or who witnessed the conduct, unless it will put the people identified at risk of immediate harm.


5. **What to do if you receive a report:**

- **Do not investigate** at the country office or project level. FHI 360 has trained investigators who will follow up and investigate complaints.
- **Ask** if there are immediate safety concerns for anyone involved. (Seek support from project team and/or FHI 360's Senior Technical Advisor for Safeguarding, as needed, to address safety concerns.)
- **Explain** that FHI 360 takes misconduct toward program participants seriously, and in order to keep program participants safe, you are required to share this information with the FHI 360 staff who are responsible for following up. For example:

This information is also included in a PowerPoint presentation, *Quick tips for responding to disclosures of misconduct towards program participants*, on Connect. This can be used to train project staff on how to respond when they receive a disclosure of harm towards program participants.

“Thank you for sharing this with me. I want to let you know that FHI 360 takes these reports very seriously, and I am required to share this information with the FHI 360 staff who are responsible for following up. This is a requirement of all FHI 360 personnel because we want to ensure the safety of all program participants and make sure that no further harm happens to you or anyone else.”

- **Explain** that you will limit who knows about the incident and only share the information with the people who need to know.
- **Explain** that FHI 360 has zero tolerance for retaliation against anyone who makes a report. (If the person is concerned about safety or retaliation, an anonymous report can be made if the person chooses.)
- **Explain** that you would like to ask a few questions to understand what happened.
- **Collect and document** information using OCIA’s *Safeguarding Incident Form* to guide the conversation. In general, ask what happened, when it happened, who was involved. Do not probe beyond this; listen and document what the person tells you.
- **Share information** about and connect to support services, including health, psychosocial, shelter, and legal services (ask colleagues for referral options, if needed; do not tell the person that they should do something; rather, provide information and offer to support the person by connecting them to support services if they choose.)
- **Submit** the completed Safeguarding Incident Form to compliance@fhi360.org

 **Note:** If you use another incident form as part of a community-based complaint mechanism in a humanitarian setting, you can submit that form to FHI 360 OCIA instead; you do not need to complete FHI 360’s form. Also, if you are unable to complete this form, do not delay in reporting the incident — even if you need to report without the completed form.

Use active listening skills when receiving disclosures of harm

- Be patient and calm
- Let the person know you are listening (nod your head, maintain eye contact)
- Allow space for silence (give the person time to think, don’t finish their thoughts)
- Focus on the person’s experience (don’t share someone else’s story or talk about your own experiences)
- Avoid “why” questions (“why” questions can be perceived as judgmental)
- Ask for clarification if you don’t understand (say: Can you explain that again, please?)
- Check your understanding (repeat what the person says to ensure you understand)
- Deliver supportive statements, as appropriate (e.g., I’m sorry you are going through this. I’m here to support you and give you information about options.)
- After the person shares what happened, who was involved, and when the incident happened, ask: “Is there anything else you can remember or would like to share?”

Adapted from [Caring for women subjected to violence: A WHO curriculum for training health-care provider](#), revised edition, 2021 (LIVES model)

6. What happens after a report is received?

- Upon learning of conduct requiring further review, FHI 360 investigators will conduct a thorough investigation in a timely and impartial manner.
- Upon receiving a complaint, an FHI 360 investigator will make an immediate assessment concerning the health and safety of the individuals involved and implement temporary remedies necessary for safety.
- Investigations will generally be conducted by the Human Resources department or Office of Compliance and Internal Audit (OCIA). FHI 360 may hire outside investigators when deemed appropriate. During investigations, FHI 360 will take actions necessary to ensure an environment of safety, security, dignity, respect, and professionalism for those involved.
- Upon completion of the investigation, FHI 360 will promptly inform all parties of the results of the investigation. This is typically done by the investigator in collaboration with other FHI 360 leadership, managers, and/or supervisors — depending on the details of the incident and who was involved.
- If the investigation determines that a policy violation has occurred, FHI 360 will take prompt corrective action to end the behavior and deter future occurrences. Corrective action may range from coaching and counseling, performance improvement plans, warnings, transfers, reassignments, demotions, suspensions, or other disciplinary action up to and including immediate separation of employment or termination of other relationship with FHI 360.

7. Confidentiality:

- Anyone who receives a complaint or who learns about a complaint as part of an investigation must do everything possible to keep the complaint confidential in order to protect the rights and privacy of the individuals involved and must only share the information with those who need to know through our [reporting mechanisms](#). This helps maintain the safety and privacy of those involved and allows the organization to maintain the fairness and integrity of the investigation and to take actions to end conduct that violates FHI 360's policies.
- Information learned through the investigation process will be disclosed only to those FHI 360 employees or other people who need to know in order for FHI 360 to fulfill its obligations to investigate and take prompt action.

FHI 360 HAS ZERO TOLERANCE FOR RETALIATION

We recognize that it can be difficult to raise a complaint, so our *Open Door and No Retaliation Policy* is in place to encourage employees to come forward with their concerns without fear of retaliation. FHI 360 also prohibits retaliation by partner personnel.

Retaliation occurs when someone penalizes or threatens to penalize another person for:

- Reporting or expressing an intent to report what they believe in good faith to be discrimination, harassment, exploitation, abuse, or any other violation of FHI 360 policy
- Assisting others in reporting policy violations
- Participating in investigations of suspected violations

It is against our policy (and may be unlawful) for FHI 360 personnel or partner personnel to retaliate against another for their participation in the complaint process. Retaliating against a co-worker or program participant who has made a complaint or otherwise participates in an investigation process is grounds for discipline, up to and including separation of employment or termination of other relationship with FHI 360.

STANDARD 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.

- **Purpose:** To ensure the program participants who have experienced SEA or other abuse are quickly connected to available support services and other resources.
- **Instructions:**
 1. **Explore** the victim/survivor support services that are available in the community where the project is implemented. The project team can tap into existing referral mechanisms, including those that are in place by other FHI 360 projects, and reach out to local victim/survivor support organizations, including GBV support services, to explore existing medical, psychosocial, shelter, and legal services.
 2. **Compile** these resources into a referral directory and distribute to all project staff so everyone is aware of these resources.
 3. **A sample referral directory template** is included in [Annex 5](#).

Ensure that the directory includes the Global Human Trafficking Hotline information:
+1 844 888 3733 or help@befree.org

4. **Ensure** the directory is reviewed regularly to check that information is current. This may involve periodically contacting the support agencies included in the directory to ask if they are still offering services and if the contact information has changed.
5. **When referring program participants to resources**, always ask them if they would like you to share information with them first, and if they are interested, share the information and offer to help connect them if they choose.

What does it mean to use a survivor-centered approach?

- Ensure that victims/survivors are informed about the steps taken during the reporting and investigation process.
- Suspend judgment and always treat victims/survivors with dignity and respect.
- When following FHI 360's mandatory reporting requirements, share information about the victim/survivor on a need-to-know basis and ensure they know who the information is being shared with and why — before it is shared. Explain limits of confidentiality. (*See Quick Tips for Responding to Disclosures of SEA or other Misconduct toward Program Participants for more information.*)
- Prioritize victims'/survivors' safety and rights.
- Inform victims/survivors beforehand of every action taken on their behalf.

STANDARD 7.3

Per *FHI 360's PSEA Policy*, where a CBCM is required or needed, use input from program participants to establish a CBCM. *Refer to CBCM training module.*

- **Purpose:** To ensure that program participants — in both humanitarian and development settings — have culturally appropriate, gender-sensitive, safe, confidential, and accessible ways to report any type of harm committed by FHI 360 personnel or partner personnel.
- **Instructions:**
 1. **Barriers to reporting:** FHI 360 understands that there are many barriers in place that prevent program participants from accessing FHI 360's standard reporting mechanisms (as described in Standard 7.1 above). Some of these barriers include, but are not limited to:
 - Shame or embarrassment
 - Distrust in system (belief that complaint won't be taken seriously)
 - Fear of stigma, being blamed, reprisal, further harm, losing services/support/aid
 - Fear of being arrested in contexts where certain behaviors are criminalized (e.g., sex work, same-sex relationships)
 - Lack of knowledge about or access to reporting mechanisms
 - Not understanding that what they experienced is abusive/exploitation
 - Fear of using a reporting mechanism that is not local
 - Social or cultural norms that discourage sharing sensitive information
 - Internalized stigma

2. **To address these barriers**, per *FHI 360's PSEA policy*, projects must explore whether a community-based complaint mechanism (CBCM) or project-level reporting mechanism is required or needed to increase program participants' access to a culturally appropriate, safe, and trusted way to report suspected or known harm.
 - **In humanitarian settings**, there are often inter-agency CBCMs set up that all organizations who are working in that setting use as a way to receive all types of complaints from program participants, including complaints involving SEA.
Where inter-agency CBCMs exist, FHI 360 must actively participate and coordinate with the people who manage these inter-agency CBCMs.
 - **In non-emergency or development settings** where an inter-agency CBCM does not exist, projects need to explore whether an intra-agency, project-level CBCM is needed for the FHI 360 project.
3. **How to determine if a project is required or needs to establish a CBCM:** Per FHI 360's PSEA Policy, projects must establish and/or participate in existing community-based complaint mechanisms (CBCMs), where they exist, if the project:
 - Operates in humanitarian/emergency response settings (must participate in existing inter-agency CBCMs and establish an internal CBCM/project-level reporting mechanism for the FHI 360 project)
 - Involves direct service provision to or distribution of commodities to program participants
 - Involves interaction with vulnerable populations at high risk of exploitation or other abuse (women, children, people with disabilities, marginalized groups)
 - Determines that there are barriers to accessing FHI 360's *standard reporting mechanisms*
4. **Common types of CBCMs:**
 - **Local project phone line** (helpline)
 - **Secure suggestion/complaint boxes** at project sites
 - **Community feedback sessions** facilitated by respected/trusted members of the community who act as liaisons between program participants and FHI 360; liaison shares feedback/complaints with FHI 360
 - **Verbal and/or written feedback** during post-service delivery or post-distribution monitoring (PDM)
 - **Help desks** (more common in humanitarian settings for inter-agency CBCMs)

5. **How to determine what type of CBCM** — or project-level reporting mechanism — is best for a project:

- Ask program participants!

Input from program participants must be sought and used to determine what type of CBCM is best suited for a project and the setting where activities or programs are implemented.

6. **How to get input from program participants:**

- Integrate questions into existing monitoring and evaluation activities or other interactions with program participants. For example:
 - Feedback sessions
 - Focus group discussions
 - Post-distribution/service monitoring
 - Satisfaction surveys
 - Community dialogues on PSEA/safeguarding
 - Orientations/trainings/workshops with program participants

7. **What to ask program participants:** Example questions:

We are trying to learn more about the best way to communicate with program participants. We also want to understand their preferences for sharing information with FHI 360 about their experiences with our programs, especially if they are harmed in any way during their participation in our programs.

- *What are examples of misconduct toward program participants by NGO/aid workers?*
- *What do you think the community needs to know about the behavior of NGO/aid workers in your community? (Do program participants understand what behaviors are not allowed by NGO/aid workers?)*
- *Are there any official channels that you know of that program participants can use to report misconduct of NGO/aid workers working in your community? If yes, how did you learn about these?*
- *Are there groups in the community who would struggle to use these channels to report misconduct? How can these barriers be addressed?*
- *What is the best way for program participants to report concerns related to harm committed by workers? (e.g., secure suggestion boxes, phone line, WhatsApp, email, in-person/verbally)*

Important: Program participants might be willing to report non-sensitive complaints using a certain method (complaints not related to abuse), but they may not feel comfortable using that same method to report SEA or other abuse. It's important to find the mechanism they would feel most comfortable with in reporting abuse/harm committed by humanitarian and development workers in that setting.

- *What do you need to know more about? Do you have any questions about the standards of behavior for NGO/aid workers? (e.g., prohibited behavior, how to report concerns, what happens when a complaint is made)*

IMPORTANT TIPS:

- **Never** ask questions about personal experiences with exploitation or other abuse.
- **Never** pressure program participants to answer questions.
- **Never** rush program participants; this may mean asking fewer questions.
- **Always** thank the program participant for their time and ideas.
- **Always** provide contact information should the program participant want to share additional information later.
- **Always** explain that there are limits of confidentiality when one reports harm committed by workers due to our ethical obligation (as staff) to keep program participants safe from further or future harm. As an organization, we are required to follow-up.

8. **When it is determined that a project-level CBCM is required or needed, use input gathered from program participants to establish the CBCM.** The project director/COP must appoint two people to co-manage the local reporting mechanism to ensure SEA complaints are handled quickly and effectively.
9. **What to do with complaints received through a CBCM or project-level reporting mechanism?** Once received by the FHI 360 country office or project team, SEA complaints or complaints involving other harm toward program participants received via a CBCM or any other local reporting mechanism must be further routed to one of FHI 360's *standard reporting mechanisms* within 24 hours or as soon as possible under the circumstances.

CBCM TRAINING MODULE

This training module (PPT slides with facilitator notes) can be used to build the capacity of project teams to explore/establish a CBCM. Available in *Arabic, French, Portuguese, Spanish*.

Domain 7 Reminders

- Report suspected or known harm toward program participants using FHI 360's standard reporting mechanisms.
- Establish a procedure for identifying local victim/survivor support services.
- Per FHI 360's policy, where required or needed, establish a community-based reporting mechanism to ensure program participants have an accessible way to report harm.



Domain 8:

Awareness-Raising among Program Participants & Staff

QUICK LINKS TO RESOURCES

- Connect: *How to print OCIA hotline posters*
- Awareness-raising materials: *Ready-to-use PSEA posters*
- Awareness-raising materials: *Editable PSEA posters and pocket card*

STANDARD 8.1

Ensure *OCIA hotline posters* are visible at all FHI 360 offices and project sites.

- **Purpose:** To raise awareness among FHI 360 personnel, partner personnel, and program participants about how to report suspected or known harm toward program participants directly to OCIA.
- **Instructions:**

1. Below are instructions for ordering and printing the OCIA hotline poster. OCIA will cover approved costs.

U.S. OFFICES: OCIA will coordinate with U.S. facilities for the printing and distribution of posters in the DC, NC HQ/PQC offices. For U.S. offices or work sites, please inform Elena Vejarano at evejarano@fhi360.org.

INTERNATIONAL OFFICES: FHI 360 offices and project sites will outsource the printing of posters. Below is a list of instructions and specifications for printing. OCIA will cover the printing costs.



2. What you need to do:

- Identify the point of contact for your region/business unit who will coordinate printing and communications with OCIA.
- Determine the number of posters you will require for your respective offices, locations, sites in your region/business unit.
- Obtain quotes from a local vendor and send these to OCIA at evejarano@fhi360.org for approval prior to confirming an order.
- Posters must be professionally printed according to the specifications below. Do not create or modify your own compliance posters.
- Remove old posters and replace with the new version (most up-to-date version)
- Notify evejarano@fhi360.org about the final order; include total number printed and locations where the new posters have been displayed.
- Send a copy of the final and approved payment document and invoice to OCIA at evejarano@fhi360.org.

3. What OCIA will do:

- Your OCIA point of contact for this project is Elena Vejarano. Please contact Elena directly at evejarano@fhi360.org or via Teams with all poster-related questions or communications
- Elena Vejarano will work directly to:
 - Provide the print ready posters with specs (*see below*)
 - Provide a project code after approval is received
 - Keep copies of the final payment documentation for OCIA
 - Coordinate with respective contacts to answer questions and provide assistance as needed



POSTER PDFS:

The OCIA hotline poster is available in the following languages:

English, Arabic, French, Portuguese, Spanish

STANDARD 8.2

Ensure program participants and all 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 use *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.

- **Purpose:** To ensure that personnel and program participants are aware of key messages related to safeguarding and how to report suspected or known harm using FHI 360's standard reporting mechanisms and project-level reporting mechanisms where they exist.
- **Instructions:**
 1. **In addition to ensuring that OCIA posters are visible** at FHI 360 offices and project sites, projects that involve interaction with program participants can use the materials below to raise awareness among staff and program participants about key safeguarding messages and how to report suspected or known harm, including information about how to access any community-based reporting mechanisms (CBCMs) that have been established.
 2. **These awareness-raising materials do not replace OCIA posters**, rather, they are in addition to them and include more detailed safeguarding-related messaging. There are two sets of materials available for project teams to use:
 - **Option 1:** These ready-to-use posters were created by FHI 360's Design Lab and include versions with different images so projects can choose the poster that is most reflective of their context. They are designed to raise awareness among program participants about key safeguarding messages and FHI 360's standard reporting mechanisms. They do not include information about project level reporting mechanisms; projects can use Option 2 below for posters and a pocket card that can be edited to include project-level reporting mechanisms, where they exist. **Download the ready-to-use posters [here](#).**
 - **Option 2:** These editable posters and pocket card templates were created by the Design Lab and set up in PowerPoint so project teams can easily edit text and change out images, as needed, for their contexts. Instructions for how to edit the materials are included in the package. Available in English, Arabic, French, Portuguese, and Spanish. **Download the materials [here](#).**



SECTION 5:

ANNEXES

- Annex 1:** FHI 360's Anti-Trafficking Compliance Plan (Universal Plan): Illustrative Supplemental Measures for High-Risk Projects
- Annex 2:** Indicators that a Person may be a Trafficking Victim/Survivor
- Annex 3:** Safeguarding in Communications
- Annex 4:** Sample Memo to File: Briefing with Suppliers to Review Safeguarding Requirements in the Terms and Conditions
- Annex 5:** Sample Template: Referral Directory of Victim/Survivor Support Services

Annex 1:

FHI 360's Anti-Trafficking Compliance Plan (Universal Plan): Illustrative Supplemental Measures for High-Risk Projects

For projects that are considered high-risk for human trafficking, supplemental measures (additional mitigation strategies beyond those included in FHI 360's Universal Plan) need to be identified and included in Section 4 of a project's plan. Below are a few illustrative examples of supplemental measures to consider. This is not an exhaustive list. The goal for high-risk projects is to take extra steps, beyond those listed in the Universal Plan, to prevent TIP within the project.

1. **Refer** to the country's national anti-trafficking legislation or strategy, where it exists, and pull out key elements for sharing widely with staff (e.g., local mandatory reporting laws and mechanisms).
2. **Develop and maintain** a list of organizations that can meet the needs of trafficking victims/survivors, and post information about local and global anti-trafficking resources in places that are visible to staff and program participants (For help identifying country-level anti-trafficking resources, refer to: <https://globalmodernslavery.org/>) Ensure that staff and program participants are aware of this global resource: The Global Human Trafficking Hotline at +1 844 888 3733 or help@befree.org
3. **Coordinate** with FHI 360's country office and Safeguarding Focal Point to orient project staff about:
 - National/local information on trafficking trends
 - Prohibited conduct per FHI 360's CTIP Policy
 - Consequences for engaging in prohibited conduct
 - Required elements of a recruitment plan, wage plan, and housing plan for employees
 - Signs that a person may be a trafficking victim/survivor (**Annex 2**)
 - How to report suspected and known trafficking-related activity to FHI 360
 - Local mandatory reporting laws regarding trafficked persons, including children
 - Local and global resources available to victims/survivors of trafficking
(Ensure the content above is integrated into existing safeguarding training that is provided to FHI 360 personnel and partner personnel)

4. **Establish** a network of translators and/or arrange for translators when working with migrants, refugees, or others who do not speak or understand local languages.
5. **Develop** a robust *screening process for labor recruiters* to minimize the risk of TIP as a result of fraudulent or misleading recruitment practices.*
6. **Seek** *input from program participants* to increase identification of TIP and referrals to support (via interviews and other confidential feedback mechanisms).*
7. **Review** key elements of the project's tailored plan during project staff meeting(s) to refresh staff knowledge.

* *Responsible Sourcing Tool, U.S. State Department's Office to Monitor and Combat Trafficking in Persons, Verite', Made in a Free World, and the Aspen Institute* (Information, tools, and strategies to prevent and respond to TIP)

ADDITIONAL RESOURCE:

U.S. TIP Report: The TIP Report includes country profiles related to trafficking, including a summary of key issues and prioritized recommendations for each country. Although many of the recommendations relate to government-level strategies, there are some recommendations that are relevant for humanitarian and development projects that interact with vulnerable populations. Review "prioritized recommendations" under the country profiles to explore strategies that are relevant for implementation at the project/community-level.

Annex 2:

Indicators that a Person May Be a Trafficking Victim/Survivor

The indicators below are included in *USAID's Counter-Trafficking in Persons Field Guide*.¹ This is not an exhaustive list but a point of reference for project staff in understanding indicators that a person may be a trafficking victim/survivor.

- The person was recruited for one purpose but is working in a different job.
- The person was recruited to work in one country but is working in a different country.
- The person is a minor who is employed but not attending school, particularly if the person exhibits signs of sexual, physical, or psychological abuse or neglect (for example, the minor has bruises/injuries, is malnourished, or appears ill).
- The person is, or appears to have been, forced to perform sexual acts.
- The person is under the age of 18 is selling sex for money.
- The person or his or her family has been threatened with harm if they try to leave the work site or the town or country of the employment opportunity.
- The person is not in possession of their identification or travel documents.
- The person's freedom of movement is, or appears to have been, restricted (for example, working under guard, is prohibited from leaving the work site to go to the bathroom without permission from the employer, or is locked into their work site or living quarters at any time).
- The person appears anxious or fearful or exhibits other behaviors that may indicate that they have been abused sexually, physically, or psychologically, or that their freedom of movement has been restricted.
- The person exhibits signs of physical abuse, such as bruises, black eyes, or other physical injuries.
- The person has been threatened with deportation, law enforcement action, or harm of any kind.
- The person appears to have been drugged or deprived of food, water, sleep, medical care, or other life necessities.
- The person appears to have been deprived of safe and sanitary living conditions.
- The person's wages are withheld by a third party, whether or not to pay down a debt.

¹ USAID's Counter-Trafficking in Persons Field Guide. Available at:
https://www.usaid.gov/sites/default/files/documents/2496/C-TIP_Field_Guide_Final_April_5_2013.pdf

- The person is incurring a debt to their employer during the course of the employment relationship (for example, if the employer is charging the employee for housing/food costs on the work site and these costs exceed or equal the wage the employee is paid).
- The person is unsure of the amount of wages they are being paid and uneducated about their rights of employment.
- The person lacks freedom of speech (for example, where one official insists on speaking for all workers rather than allowing each worker to respond directly to questions asked by work site visitors or inspectors).
- The person appears to have been coached on what to say to visitors to the work site or to law enforcement.
- The person is prohibited by his or her employer or other people from freely contacting friends or family.

Annex 3:

Safeguarding in Communications

The following procedures will assist project personnel who are engaged in communications activities in protecting program participant's safety, dignity, integrity, and right to privacy when gathering and disseminating information, images, and other media content:

- Project personnel must orient photographers, filmmakers, and writers, journalists and any other communications specialists working on assignments that involve interaction with program participants on the requirements outlined in Annex 3, and orient them to FHI 360's *Code of Conduct for Volunteers, Incentivized Workers, and other Non-Staff* and obtain signatures confirming their awareness of and obligation to comply with the Code.
- Project personnel must accompany journalists, photographers, filmmakers, and/or writers during program visits and interactions with program participants, including children.
- Project personnel are responsible for asking permission and obtaining informed written consent from program participants before collecting information from them or taking photographs or videos of them. When a child is younger than 18 years, permission from the child's parent or guardian is **also required** using FHI 360's *consent form* (available in multiple languages) before posting or using the photo for any internal or external publication, including funder/donor reports and any other platform (e.g., FHI 360 newsletters, social media sites, WhatsApp groups). Teachers and other community leaders are not able to give consent on behalf of the child. The only exception is in cases where the project has a protocol approved by FHI 360's Protection of Human Subjects Committee, allowing for consent to be obtained by someone other than the parent/guardian. To obtain consent, personnel should tell program participants, including children and their guardians, the purpose of taking the information, photos, or videos; how the material will be used or disseminated; and the risks or benefits associated with the dissemination of the information or images. Their decision to refuse to have their images or information taken must be respected, and they must not be offered rewards as incentives to obtain their consent and assent. Consent forms should indicate a time period that the image or video can be used, with a maximum, generally, of no more than three years, with some exceptions approved by Corporate Communications. Program participants, including children or parents/guardians, can withdraw consent at any time by contacting project personnel, and FHI 360 will discontinue use and remove materials from its websites and databases.
- FHI 360 team members, including staff, incentivized workers, volunteers, board members, partners, and other associated individuals should never take "selfies" or other photos with program participants using mobile phones, even when program participants request the photo be taken, unless the protocols outlined in these procedures have been followed, including obtaining assent from child(ren) and consent from adult program participants and a child(ren)'s parent or guardian.

- FHI 360 team members, including staff, incentivized workers, volunteers, board members, partners and other associated individuals may not post images of program participants to their personal social media accounts.
- Photos and videos of program participants must not undermine program participants' dignity (e.g., no images showing children in extreme distress, no blood, and no partially clothed people, including infants or young children in diapers). They should always paint a fair and balanced picture of program participants and avoid stereotypes and sensationalism. Special consideration should be given to photographs depicting adult and child program participants in particularly difficult circumstances, such as people with disabilities, people living with HIV, people experiencing homelessness, refugees, people in situations of conflict and disasters, children associated with armed groups, people who are victims/survivors of labor or sex trafficking, and people who are victims/survivors of sexual abuse or other forms of exploitation. Images of people in extreme suffering must not be used, including images or videos related to child or adult abuse or exploitation, trafficking, or any other type of abuse, regardless of program participant or parental/caregiver consent. Any exceptions must be reviewed and approved by Corporate Communications, the project director, or another senior leader from the program, regional office, or business unit.
- If images or other media reveal the health status of any program participant, including children, the consent form must be explicit that the program participant's health status will be revealed. Some countries have laws against revealing a person's health status or showing the person's face in related communications. It is important to understand local laws before using photos or other media that reveal a person's health status.
- Taking photos or using images of program participants, including children, who are not fully clothed, including people wearing swimsuits or children wearing diapers, is always prohibited by project staff, photographers, or others working on behalf of FHI 360.
- Images and text should not make inaccurate generalizations. For instance, the term "vulnerable children" or "vulnerable women" should not be used without additional contextual information. It is also important to avoid using terms that label people and associate them directly or indirectly with health or social issues that can stigmatize them. An example is the term "AIDS orphans," which implies that orphans have AIDS.
- Careful consideration should be given to how a particular photo or video is used. For example, if a photo is taken of a program participant involved in a specific activity or event, the photo can be used in communications/media about that activity/topic area — as long as written, informed consent is obtained from the program participant or a child's parent/guardian. However, that same photo must not be used in other communications/media to describe a completely different activity or topic. For example, a photo taken of a child during a school activity cannot later be used in a different publication about domestic violence or child abuse as it could give a misleading impression or misrepresentation that the person depicted in the accompanying photo is subject to or a

victim of such abuse.² The images of one program participant should not be used to describe another program participants. For example, in a publication covering a specific topic such as HIV, we should never use photos of people who do not have HIV in that publication. It is unethical to use unrelated photos, especially of people, for the purpose of illustrating a publication.

- Stories or descriptions of program participants may be adapted or edited to preserve people's dignity and confidentiality, including blurring the faces of people if the photos will be used for wider dissemination or removing other identifying information such as location. However, photos must never be fabricated or manipulated to change the appearance or expression of a person or the reality of the photo, such as cutting or pasting people or objects that were not in the original image, photoshopping, or moving people together in an image when they were not together in reality.
- Program participants must not be manipulated to distort reality (e.g., asking them to cry or smile for the camera).
- Whenever possible, program participants, including children, should be allowed to give their own accounts rather than having others speak on their behalf, including FHI 360 team members.
- Information that may be used to identify the location of a program participant and place the person at risk should not be used or disseminated, including home addresses. Distinctive buildings, street signs, and other landmarks should not be visible in photos of program participants, and geotagging must be disabled on digital photos. Additionally, facades of buildings where we provide services or do distributions must never be included in images used externally.
- A minor program participant's real name should only be used in rare circumstances (e.g., promoting a person's painting or other piece of art or accomplishment), and even then, only first names should be used, and permission (consent) must be obtained from adult program participants, as well as the child (assent) and the parent/caregiver (consent). Otherwise, pseudonyms should be used to identify program participants under the age of 18. The names of other family members should also be changed to ensure confidentiality. Note: The use of pseudonyms should always be explained to program participants, including children and guardians, so they understand that we will not use real names. It is recommended that program participants and parents/guardians/other family members be offered the option to use a pseudonym and be asked to choose their own pseudonym.
- Never publish the addresses, phone numbers, email addresses, or social media pages of program participants or their parents/guardians or other family members.
- The use of images should always follow the procedures in FHI 360's *Corporate Communications Visual Identity Guide*.

² Dudley Safeguarding People Partnership. Online safety and use of images. Dudley (UK). Available from: <https://safeguarding.dudley.gov.uk/safeguarding/child/work-with-children-young-people/online-safety-and-use-of-images/>.

- FHI 360's Communications Resource Center has a large collection of photographs that are approved for publication and downloads and can be used at any time: <https://fhi360.montala.com/>. These photos can only be used if the photo is related to or illustrative of the topic being covered.

ADDITIONAL RESOURCES:

- *FHI 360 consent/release forms on Connect*
- *FHI 360's Corporate Communications Visual Identity Guide*

Annex 4:

Sample Memo to File: Briefing with Suppliers to Review Terms and Conditions

Today's date:

Country:

Project Name:

FHI 360 staff person who conducted the briefing with supplier:

Subject: Briefing conducted with **[SUPPLIER]** to review safeguarding-related requirements

On **[DATE]**, a briefing was conducted with **[SUPPLIER]** to review the terms and conditions of their **[SUBCONTRACT/SUB AGREEMENT/PURCHASE ORDER]** related to safeguarding program participants, including prohibited conduct, reporting requirements, how to access FHI 360's reporting mechanisms, and the requirement for the supplier to ensure this information is further cascaded to supplier's personnel and their suppliers who will work on the FHI 360-supported project.

Although not required per the terms and conditions, to support suppliers in further cascading these requirements, FHI 360 shared the link below to our e-module for suppliers ("Safeguarding Program Participants") as a resource that they can use to further cascade key information to their own personnel.

Link: academy.fhi360.org

Annex 5:

Sample Template: Referral Directory of Victim/Survivor Support Services

(Add rows as needed)

HEALTH SERVICES	SOCIAL SERVICES	JUSTICE/LEGAL SERVICES
<p>[Name of Organization/Facility]</p> <p>Hours:</p> <p>Location:</p> <p>Focal point:</p> <p>Phone:</p> <p>Email:</p> <p>Services available:</p>	<p>[Name of Organization/Facility]</p> <p>Hours:</p> <p>Location:</p> <p>Focal point:</p> <p>Phone:</p> <p>Email:</p> <p>Services available:</p>	<p>[Name of Organization/Facility]</p> <p>Hours:</p> <p>Location:</p> <p>Focal point:</p> <p>Phone:</p> <p>Email:</p> <p>Services available:</p>
<p>[Name of Organization/Facility]</p> <p>Hours:</p> <p>Location:</p> <p>Focal point:</p> <p>Phone:</p> <p>Email:</p> <p>Services available:</p>	<p>[Name of Organization/Facility]</p> <p>Hours:</p> <p>Location:</p> <p>Focal point:</p> <p>Phone:</p> <p>Email:</p> <p>Services available:</p>	<p>[Name of Organization/Facility]</p> <p>Hours:</p> <p>Location:</p> <p>Focal point:</p> <p>Phone:</p> <p>Email:</p> <p>Services available:</p>

SECTION 6:

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