

PARTNER¹ SAFEGUARDING POLICY & PROCEDURE [PSPP]

Applies to: Overseas Operations
Sponsor: SVP/OverOps
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Purpose:

The purpose of this policy & procedure is to establish the standards related to CRS Partner Safeguarding: **(I) Capacity Assessment, (II) Capacity Strengthening, and (III) Monitoring** under CRS (sub)awards² consistent with and in response to CRS Safeguarding Policy.

Scope:

This Policy & Procedure applies to all CRS-funded for-profit and non-profit organizations³ **involved in programmatic deliverables⁴ that involve direct⁵ and regular (more than once every 3 months) in-person interaction with project participants**, regardless of the instrument of the award, i.e., Grant (including discretionary-funded project agreements), Subrecipient (SR) Agreements (including Fixed Amount Awards), or Commercial Contracts (including subcontracts⁶ but excluding consultancies both with individuals and organizations). Unconditional Cash Contributions⁷, and agreements with no financial commitment are excluded from the scope of this document.

Policy & Procedure:

I. Capacity Assessment

A Partner Safeguarding Capacity Assessment (Assessment) is carried out with all Partners prior to signing a formal agreement. **Partners with agreements pre-dating PSPP that were active when PSPP became effective are required to undergo an Assessment within twelve (12) months from the PSPP effective date. Similarly, the Partners with agreements signed after PSPP effective date, who had active agreement(s) when PSPP became effective, must be assessed within twelve (12) months from PSPP effective date. Partners that did not have active agreements on PSPP effective date, require an Assessment prior to signing agreement except as provisioned under parts I.D., I.E., and I.F. of this policy & procedure.**

The Assessment evaluates the Partner as meeting or not meeting CRS Partner Safeguarding standards. The Assessment evaluates the Partner's overarching approach to addressing CRS' Safeguarding Minimum

¹ Organizations involved in programmatic deliverables and directly interacting with project participants.

² Term (sub)award is used to describe both commercial and noncommercial financial commitments and include recipient agreements, subrecipient agreements, contracts, and subcontracts.

³ This excludes government and government owned entities. CRS is exploring alternatives to ensure such partners align with global safeguarding minimum standards where feasible. In the meantime, CRS remains flexible to provide capacity strengthening support if/when requested by such partners.

⁴ If the activity/action is described in the activities section of the relevant proposal, it is considered a programmatic deliverable.

⁵ Direct interaction refers to interaction with project participants required by the project design/assigned task (for example, not incidental interaction that might occur when installing a well at the community level).

⁶ A subcontract refers to an award instrument made to a partner where CRS is a prime recipient (contractor).

⁷ A contribution is a cash disbursement issued in response to a request initiated by a Partner to meet its needs. Since a contribution is an outright gift without any financial restrictions, a contribution transaction is considered to have been completed from an accounting standpoint when the disbursement is made.

Standards, rather than the approach adopted exclusively in relation to the project implemented on behalf of CRS.

The Assessment is comprised of seven Minimum Standards: organizational policies, flow down requirements, recruitment, staff training, reporting mechanisms, investigation processes, and survivor assistance. Within each standard there are a range of sub-standards, i.e., components of specific standards that collectively represent the overarching standards; a standard would not be considered fully met if all substandard are not met collectively.

The Assessment is a collaborative process, where a shared understanding of the purpose of the assessment, the implication, and the Partner's organizational Safeguarding strengths and areas of improvement are developed.

Unless exempt under parts I.D. and I.E. of this document, Partners that operate in more than one country (international) through their representations, country offices, subsidiaries, federation members, or affiliates, must undergo the Assessment as well as Capacity Strengthening and Monitoring activities at the location where the subaward is implemented. This may result in multiple Assessments, Capacity Strengthening and Monitoring activities for the same global entity yet are essential to be conducted as such since each global entity has unique policy & procedure environment at global and local levels that do not always complement the objective of this policy & procedure.

The Assessment process is comprised of an initial Partner self-assessment⁸, followed by CRS verification/validation, and must be completed using the assessment form.

I.A. Orientation (Assessment Step 1): The Assessment process commences with a mandatory Partner orientation session on the assessment purpose, process, CRS Partner Safeguarding Minimum Standards, and key terms. The session occurs face-to-face, except in circumstances where logistical issues or security constraints prevent in-person meetings from occurring in a timely manner.

I.B. Self-assessment (Assessment Step 2): The self-assessment is completed by Partner and requires evidence in a form of supporting documentation for each sub-standard. Examples of evidence for each sub-standard are listed in the Assessment Form found in attachment.

I.C. Verification, Approval and Recording (Assessment Step 3): During the verification step, the Senior Partner Safeguarding Officer, or Partner Safeguarding Focal Point (SPSO/PSFP), as appointed by the CR/CM⁹, determines if the evidence provided demonstrates that the Partner has met the relevant sub-standard. In instances where the evidence provided (or lack thereof) indicates that the Partner does not meet the Safeguarding Minimum Sub-standard, the SPSO/PSFP must discuss the identified gaps with the Partner organization as part of the assessment process. The Partner must be given an opportunity to provide additional supporting documentation and clarifications or correct the responses in question. If there is a disagreement between the Partner

⁸ If agreeable to both parties, Country Programs and Partner organizations can complete the assessment together. This is often referred to as a co-facilitated assessment. It is important to note that CRS is responsible for undertaking the verification of evidence submitted and should there be a disagreement about the outcome of a co-facilitated assessment, the SPSO/PSFP, in coordination with the Regional and Global Safeguarding advisors and the CR/CM make the final determination.

⁹ For countries with no CRS presence, the role of SPSO/PSFP is assumed by the Regional Safeguarding Advisor/Focal Point, and for all other cases – by Safeguarding Director/Delegate.

and CRS regarding the Partner's alignment with a sub-standard, the SPSO/PSFP, in coordination with the Regional and Global Safeguarding advisors and the CR/CM¹⁰ make the final determination.

The final Assessment results are approved by the CR/CM, recorded in the Information Management System (IMS) and communicated to the Partner in writing.

The Partners who meet all Safeguarding Minimum Standards do not require reassessment, however, CRS reserves the right of reassessments as appropriate, determined by the local, regional, or global advisors and CR/CM approval. Such situation might occur based on observations or allegations suggesting that the assessment results have changed, not adhered, or compromised.

I.D. Acceptance of results of the Caritas Internationalis 5th Management Standard: CRS will accept the results of a Safeguarding capacity assessment completed under Caritas Internationalis 5th Management Standard on Safeguarding (CIMS Standard 5). The acknowledgement of these assessments will be subject to the following:

- I.D.1. The Assessment and the supporting documentation must be uploaded to the IMS.
- I.D.2. To ensure familiarity with the other steps in CRS' Partner Safeguarding framework, the SPSO/PSFP must deliver the mandatory orientation session outlined in I.A. of this policy & procedure.
- I.D.3. The SPSO/PSFP can agree with the Partner on whether to develop a new Safeguarding Capacity Improvement Plan (SCIP), exclusively related to CRS' Safeguarding Minimum Sub-standards, or to identify actions listed in the organizations existing (SCIP) that correspond to CRS' Safeguarding Minimum sub-standard. Depending on the determination, the applicable improvement plan documents must be uploaded to Gateway.

I.E. New Agreements with Previously Assessed Partners (including I.D. above): New agreements (projects) with Partners that have been previously assessed and/or whose CIMS Standard 5 assessment results have been previously accepted, would require a confirmation in the Agreement Review Summary that the partner has fully implemented the SCIP or are within the agreed implementation timeline. This review must be completed prior to signing a new agreement and must take into consideration the previously set deadlines for meeting CRS standards and the progress the organization made to meet the set deadlines. CRS' expectation is that the SCIP must not be interrupted regardless of the length of agreement. However, the maximum timeframe for the updated SCIP must not exceed the maximum time allowable to address the Safeguarding Minimum Standards (as determined by the Assessment), accounting for the period during any previous agreements between CRS and the Partner, where the Partner had an active SCIP.

The updated Improvement Plan and the re-assessment results for such formerly assessed Partners must be uploaded to Gateway prior to signing new agreements. CRS officers in charge have the duty to ensure that the SCIP and assessment results are up-to-date and accurate prior to entering new agreements regardless of whether there are existing agreements with the Partner or not.

¹⁰ For countries with no CRS presence, this role would be attributed as follows: a) Emergencies – HRD VP, b) Outreach Countries – respective CR and /or RD (as applicable), c) Global Grants– respective Global Grants/PIQA Director or Safeguarding Director as applicable, or CR (if implemented in the CP).

I.F. Simplified Safeguarding Process (Special Circumstances). The Simplified Safeguarding Process is accommodated as follows:

I.F.1. For the maximum duration of the first six months of a new emergency response, the new Partners that have not undergone a CRS Safeguarding Assessment in the past, do not have a pending SCIP, and are being partnered under Emergency projects, may not be required to undergo an Assessment prior to entering into an agreement with CRS. Instead, these partners are required to implement the Simplified Safeguarding Risk Mitigation Measures. If the Simplified Safeguarding Process is relevant to a new Partner, a waiver must first be requested through the IMS. Then the Simplified Safeguarding Process must be documented in the IMS and completed prior to entering into an agreement. If the Emergency agreement extends beyond six months, as soon as the first six months of the Emergency agreement has elapsed [i.e., the day after the first six months], such partners must undergo the standard Assessment and develop their SCIP.

I.F.2. The Partners not previously assessed by CRS with no pending SCIP that are being partnered to implement Commercial Agreements with a duration of seven (7) months and more¹¹ are required to implement the Simplified Safeguarding Risk Mitigation Measures. The simplified process must be completed prior to entering into an agreement and documented at the CP level¹².

II. Capacity Strengthening

II.A. Safeguarding risk mitigation measures

If a Partner is assessed as not meeting one or more Safeguarding standard/s, CRS institutes the following capacity strengthening strategies and risk mitigation measures.

- a. The Partner must develop a Safeguarding Capacity Improvement Plan (SCIP) to address the identified gaps and document it using the standardized Improvement Plan template.
- b. The SPSO/PSFP must offer support to the Partner to develop the SCIP guided by the Partner Safeguarding Toolkit designed to offer relevant capacity building, institutional strengthening, and accompaniment support, which includes templates, guiding documents and training material relevant to each Safeguarding Minimum Standard. CRS Country Programs must offer partner organizations training and relevant templates, specific to the identified Safeguarding gaps and ensure adequate accompaniment support to partners throughout the implementation of their SCIP.
- c. The improvement plan must be developed within 60 days of the completion of the Assessment. The period of completion of the improvement activities must follow the II.A.d below. The SCIP must be uploaded to Gateway by the SPSO/PSFP.
- d. All partners that did not have an active agreement with CRS prior to September 19, 2022 [the date the PSPP was implemented], will have a maximum period of two or four years [see II.A.e below] from the date of assessment to implement their SCIP.
- e. Any existing Partner assessed as not meeting any one of the safeguarding minimum standards and meeting any of the below criteria will be given two years after the assessment completion date to meet CRS' partner safeguarding minimum standards, otherwise the period of SCIP implementation is four (4) years. The SPSO/PSFP (or equivalent) must record the allocated timeline in the IMS.

¹¹ Commercial contracts under 7 months do not meet the scope of the PSPP.

¹² Documentation for countries with no CRS presence must take place in the Region/HQ (as applicable).

- Partners working in locations where oversight and support provided by CRS is via remote management
- Partners specifically targeting populations at high risk of exploitation and abuse, on behalf of CRS, as determined by the CP SMT. For example, projects specifically targeting:
 - Adults and/or children with disabilities
 - Unaccompanied children
 - Adults and/or children residing in residential care facilities
 - Survivors of GBV or trafficking
 - Minority/marginalized groups
- Partners within which safeguarding concerns have previously been identified
- Partners that sub-grant to other implementing partners with CRS funds
- Partners extensively relying on volunteers to implement CRS funded projects
- Partners with estimated annual budget of \$500,000 or more under CRS awards as planned at the time of assessment completion

II.B. All Partners assessed as not meeting the Standard 1 (Safeguarding related policies) must address the gap/s within eight months of the completion of the Assessment. In the interim, all Partner staff, interns, volunteers, visitors (Affiliates) involved under the CRS funding agreement must sign the Partner-adapted version of CRS Safeguarding Project Code of Conduct) or equivalent. CRS reserves the right to monitor the existence of the signed Code of Conduct through verification of documentation and/or verbal interview(s) with the Partner Affiliates.

II.C. Partners who fail to fully implement SCIP and become full compliant with all CRS Safeguarding Standards within the time specified in SCIP (2-4 years) will not be eligible to implement activities involving direct contact with program participants. If critical to project implementation and unless the donor suggest otherwise, the Partnership may continue for the duration of the agreement.

At the end of the SCIP implementation, as defined in the II.A.d and II.A.e of the PSPP, the SPSO/PSFP (or equivalent) documents the status of the SCIP implementation informed by the existing Monitoring and the initial Assessment forms to determine whether the partner is eligible for CRS funding going forward. A partner that has not fully met all the (Sub)Standards based on the specified timeline, CRS must not partner with such organizations on projects that meet the scope of this policy & procedure.

III. Monitoring

All Partners that meet CRS standards based on the documented assessment results, will not require Safeguarding monitoring unless determined by the CP/RO or the Safeguarding Director. All Partners that do not meet CRS Minimum Standards and have an SCIP must meet the following Safeguarding monitoring standards:

III.A. The SPSO/PSFP to undertake one Monitoring Visit per quarter. The first Monitoring Visit must take place within three months of finalization of the assessment. The purpose of the visit is to conduct a structured quarterly review of the implementation of the SCIP (at the institution level, combined for all CRS-(sub)funded projects), identify, and mitigate any risks that may arise or have arisen because of the Partner not meeting the Safeguarding Minimum Standards, as well as to provide an opportunity for accompaniment, capacity building and institutional strengthening.

III.B. The Monitoring Visits can occur in person or remotely. However, at least one visit every six (6) months must include direct and in-person interaction with program participants. Monitoring Visits with program participants must be coordinated with respective MEAL officers and integrated into quarterly MEAL field visits, consistent with the CRS Meal Policy and Procedure.

III.C. Monitoring Visits must be recorded on the standardized Monitoring Form and uploaded to the IMS within five business days of the visit. The Partner must be provided with a copy of the Monitoring Form.

III.D. Monitoring visits related to the implementation of SCIP are not required upon full implementation of SCIP and the Partner's full compliance with CRS Safeguarding Minimum Standards (see II.C.).

Deviation:

Any requests for deviation from this policy & procedure for Assessments and Capacity Strengthening must be approved by the Safeguarding Director using the IMS Signing an agreement without a CRS-approved assessment, as applicable, qualifies as a deviation, regardless of the assessment interim status. There are two (2) categories of deviations:

1. Time-bound Exceptions with Compensating Mitigation Measures e.g., the simplified safeguarding process for emergency situations (see I.F.1.), utilization of CRS program participant feedback-response mechanisms, including hotlines, training partner staff, orienting project participants etc.
2. Time-bound Exceptions without Compensating Mitigation Measures.

The Safeguarding Director is responsible for documenting all deviations and compensating mitigation decisions in the IMS and alerting the SVP/OO of all deviations approved under the PSPP.

Partner Safeguarding Standard and Sub-standards

Standard	Sub-standard	
1. CRS partners have policies that reflect global safeguarding standards	1.01	The relevant safeguarding requirements contained within various policies apply to all staff and affiliates.
	1.02	The organization's safeguarding requirements are applicable to staff and affiliates both during and outside of work hours.
	1.03	Harassment, including sexual harassment of staff or affiliates by other staff or affiliates, is prohibited in a policy.
	1.04	All forms of exploitation and abuse, including (sexual) exploitation or abuse of program participants and community members by staff and affiliates, are prohibited in a policy.
	1.05	A policy explicitly prohibits staff and affiliates from exchanging money, employment, goods or services/assistance for sex, including sexual favors.
	1.06	A policy explicitly prohibits staff and affiliates from engaging in trafficking of persons, in all forms
	1.07	Child abuse of any kind, including sexual, physical and emotional abuse and neglect of children, is explicitly prohibited in a policy.
	1.08	Child labor is specifically prohibited in a policy.
	1.09	Sexual activities/ relations with any child under 18 years of age (UNCRC) are prohibited in a policy.
	1.10	A policy instructs staff to avoid unsupervised interactions with child program participants.
	1.11	A policy explicitly requires staff and affiliates to report concerns or suspicions of sexual exploitation, abuse, child abuse or trafficking of persons by a fellow aid/NGO worker (whether in the same agency or not).
	1.12	A policy explicitly prohibits the organization or its staff from retaliating.
	1.13	Relevant policies provide definitions of all forms of exploitation, abuse and harassment covered in the organization's policies, in accordance with international standards.
2. CRS partners require their suppliers, service providers and sub-recipients to prohibit, report and address all forms of exploitation and abuse	2.01	The organization includes a standard safeguarding clause in all contracts and agreements with service providers and suppliers which affords an equivalent level of protection as the CRS template.
	2.02	The organization includes a standard safeguarding clause in all contracts and agreements with implementing partners/sub-recipients which affords an equivalent level of protection as the CRS template.
3. CRS' partner recruitment practices reflect safeguarding global minimum standards	3.01	The organization includes a question regarding previous substantiated safeguarding misconduct in reference checks for all staff and volunteer positions in direct contact with program participant.
	3.02	The organization requires all recruited staff and affiliates to self-disclose if they have been the subject of a substantiated misconduct investigation concerning harassment, exploitation and/or abuse.
4. CRS partners ensure that all staff and affiliates receive a mandatory safeguarding orientation	4.01	The organization provides a safeguarding orientation session for all staff and affiliates.
5. CRS partners provide program participants and community members with access to a reporting channel and have a process in place to handle safeguarding	5.01	The organization has established and publicized, at minimum, one reporting channel for communities.
	5.02	The organization has a documented process in place for handling safeguarding reports from program participants and community members which ensures confidentiality.
6. CRS partners utilize systematic and confidential processes to investigate safeguarding allegations	6.01	The organization has investigation processes that demonstrate a commitment to confidentiality and the safety of all parties involved in an investigation.
	6.02	The organization has staff trained on how to undertake an investigation of sensitive/safeguarding complaints or the organization knows how to access investigative support (via external expertise/organizations)
	6.03	The organization maintains a register of allegations, investigation outcomes and disciplinary actions taken
7. CRS partners have a system to refer survivors of safeguarding violations to locally available services, based on their needs and consent	7.01	The organization has documented mapping of locally available services and a referral process for survivors in all areas of operation