CRS Policy on Safeguarding

Applies to: All Staff, Interns, Volunteers, Partners, Suppliers, Service Providers, and Visitors (Worldwide), and Board Members

Sponsor: EVP HR

Created On: June 1, 2020

Approved Revision: TBD

Expiration Date: December 31, 2022

This policy supersedes CRS’ Safeguarding Policy created November 1 2018.

Definitions within this policy supersede those referenced in sections A.1. and A.2. of the CRS Code of Conduct and Ethics (2018 Revision – V.7)

Purpose:

1. Safeguarding is the responsibility that all organizations have to ensure that their programs and staff, and those engaged by, or in service to, the organization, honor and protect the rights and dignity of all people—especially children and vulnerable adults—to live free from abuse and harm.

2. At Catholic Relief Services (CRS), this responsibility is paramount given that safeguarding is seen as an integral part of the mission and values of the Catholic Church and one that is firmly rooted in our belief that each individual has a unique worth created in the image and likeness of God.

3. Safeguarding is also fundamental to our identity as a humanitarian and development organization and our commitment of accountability to those that we serve - to creating and maintaining a culture of safety and preventing harm.

4. The purpose of this policy is to set a clear standard for those included in the scope of this policy, regarding their moral and legal obligations to treat all people with respect; to actively prevent all forms of harassment, abuse, and exploitation, including all forms of sexual misconduct and human trafficking.
Scope:

5. The CRS Safeguarding Policy applies to all CRS staff, including CRS Board Members, and “affiliates”, which includes interns, volunteers, and visitors.¹

6. CRS staff, Board Members and affiliates are expected to treat all people with whom they have contact with respect, to actively prevent all forms of harassment, abuse, and exploitation, including all forms of sexual misconduct and trafficking, and to ensure our programs do no harm to the communities in which we work. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.

7. Whereas many CRS policies vary across regions—contextualized to particular locations and cultures—the CRS Safeguarding policy is globally binding. As such, country programs need to ensure that this global policy is incorporated into local employment manuals and approved by local authorities, as applicable.

8. This policy applies to CRS staff activities and behaviors at work, outside work, and while on leave.

9. CRS is committed to work only with organizations/entities—partners, suppliers and service providers, including consultants—who are equally committed to the dignity of individuals and equally vigilant about preventing and addressing harassment, abuse, and exploitation. As such, this policy also applies to all CRS partners, suppliers and service providers.²

Policy:

10. CRS is committed to creating and maintaining an environment—both in our workplace, in our projects, and in the communities in which we work—that promotes our core values and prevents the harassment, abuse, and exploitation of all with whom we interact.

11. All forms of harassment, exploitation and abuse, including sexual misconduct and trafficking, are prohibited conduct per this policy. Harassment and sexual harassment—as defined below—typically refers to prohibited conduct in the context of the workplace—for example, behavior by CRS staff or affiliates towards other CRS staff, affiliate, partner, supplier, or service provider staff; or partner, supplier or service provider staff conduct directed at CRS staff or affiliates.

¹ See Definitions section below for description of groups included in these categories.
² See Definitions section below for description of entities included in these categories.
Exploitation and abuse, including trafficking—as defined below—typically refers to prohibited conduct by CRS staff, affiliates, partners, suppliers and service providers against all other persons, foremost children, vulnerable persons and CRS program participants.

**Prohibited Conduct:**

**Harassment**

12. General harassment is unwanted, unwelcomed and uninvited behavior that demeans, threatens or offends and results in a hostile environment. Harassment is typically targeted at an individual, or a particular group of individuals. This includes, but is not limited to, harassment based on race, color, religion, ancestry or national origin, sex, age, marital status, sexual orientation, physical or mental disability or handicap, medical condition, protected veteran status, or genetic information and any other status protected by law.

13. General harassment is not sexual in nature and may consist of verbal or physical conduct that insults or shows hostility or aversion towards an individual or group of individuals. Some examples of conduct that may constitute harassment (but not limited to) are: (a) the use of derogatory statements, or abusive words or phrases, jokes, unwelcome pranks, slurs, negative stereotyping, or threatening, and other intimidating or hostile acts (b) written or graphic material that insults, stereotypes or shows aversion or hostility towards an individual or group and that is placed on walls, bulletin boards, email, voicemail, or elsewhere on the organization’s premises, or circulated in the workplace; and (c) a display of symbols, slogans, or items that are associated with hate or intolerance towards any select group.\(^3\)

**Bullying**

14. Bullying, defined as persistent and repeated mistreatment of one or more targeted persons by one or more perpetrators and includes (but is not limited to) threats; intimidation; public humiliation/name-calling; persistent and unwelcome teasing; abuse or use of power to undermine, humiliate or denigrate; intentional work interference/sabotage; or stalking. While harassment is usually based on protected characteristics

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\(^3\) Adapted from *US Equal Opportunity Commission.*
[https://www.eeoc.gov/laws/types/harassment.cfm](https://www.eeoc.gov/laws/types/harassment.cfm)
and may be easier to spot, bullying can occur to anyone and may be more subtle and accumulative.⁴

Sexual Harassment

15. Sexual harassment is a specific type of harassment which can cross age and gender boundaries and may include unwelcome sexual advances; request for sexual favor; verbal or physical conduct or gesture of a sexual nature; or any other behavior of a sexual nature that might reasonably be expected/perceived to cause offense or humiliation to another and when such conduct interferes with work; is made a condition of employment; or creates an intimidating, hostile or offensive work environment.⁵ Sexual harassment can be verbal, physical or visual. It includes actions directed at an individual or actions observed by an individual.

16. Verbal: includes requests of a sexual nature made by one person to another. When from a supervisor or superior, these requests may demand or imply a condition of employment or compensation, either implicitly or explicitly, or when an employment decision is based on an individual’s acceptance or rejection of such conduct. When from CRS to a partner or supplier these requests may imply a condition of continued cooperation, commercial or otherwise.

17. Physical: includes unwanted or inappropriate leering or touching of any kind, unwelcome sexual advances. Stalking may also be associated with sexual harassment.

18. Visual: includes the sharing or posting of images that create an offensive, hostile or intimidating environment or interferes with an individual’s job performance. Examples include—but are not limited to—displays of sexually explicit or demeaning materials such as offensive pictures, cartoons, symbols, or items in the workplace.

Exploitation

19. Exploitation is the use of force or other forms of coercion, abduction, fraud, deception, abuse of power or position of vulnerability; or the giving or receiving of payments or benefits to achieve the consent of a person having control over another person.⁶

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⁴ Adapted from Workplace Bullying Institute: https://www.workplacebullying.org
Forms of exploitation:

20. Sexual Exploitation is any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.7

21. Child Labor is defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It includes work that is mentally or physically dangerous and/or interferes with their schooling.8

22. CRS Staff are prohibited from hiring children under the age of 15—regardless of any perceived benefit to the child or family—and prohibited from funding communities or programs in which child labor, as defined above, is occurring or condoned.

Abuse

23. Abuse is a deliberate act of ill treatment that can harm a person’s safety, well-being, dignity and development. It often involves individuals who have a relationship of responsibility and care for the victim including project staff, parents, guardians, teachers, community workers, health-care providers, religious leaders, friends or other children.9

24. CRS staff are prohibited from any form of abuse of an individual, foremost children, vulnerable adults and program participants.

Forms of abuse10:

25. Sexual abuse: actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.11 All sexual activity with a child, defined as person under the age of 18 years, is considered sexual abuse.

26. Physical Abuse: Non-accidental use of physical force that inadvertently or deliberately causes a risk of or actual injury or suffering. Physical force includes but is not limited to hitting, shaking, kicking, pinching,

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9 Adapted from: Better Care Network; Save the Children and UNICEF.
10 Adapted from United Nations Glossary on Sexual Exploitation and Abuse (24 July 2017) and Keeping Children Safe (www.keepingchildrensafe.org.uk).
pushing/pulling, grabbing, burning, female genital mutilation, torture, and other physical acts.

27. Emotional Abuse: Harm done by persistent or severe emotional ill-treatment or rejection, such as degrading punishments, threats, bullying, and not giving care and affection, resulting in adverse effects on the behavior and emotional state of an individual or the behavior and development of a child or young person.\(^\text{12}\)

28. Neglect/Negligent Treatment: Allowing for context and resources, the failure to meet the basic physical and/or psychological needs either deliberately or through negligence of a child or individual under the responsibility of the care giver/guardian. Neglect includes but is not limited to failing to provide adequate food, sufficient or seasonally-appropriate clothing and/or shelter; failing to prevent harm; failing to ensure adequate supervision; failing to ensure access to appropriate medical care or providing inappropriate medical treatment (e.g., administering medication when not authorized); or failing to provide a safe physical environment (e.g., exposure to violence, unsafe programming location, unsafe sleeping practices, releasing a child to an unauthorized adult, access to weapons or harmful objects, failing to child-proof a space that children will occupy, etc.).

**Trafficking**

29. Trafficking in persons is a form of exploitation. Trafficking is defined as the recruitment, transportation, or receipt of persons by means of deception, coercion, threat, or force for the purpose of exploitation such as for labor, prostitution, or sexual exploitation.\(^\text{13}\)

30. CRS places a special focus on anti-trafficking of women and children, given their specific vulnerability and given the cruelty and perversity to which trafficked women and children are particularly subjected.

31. The following are types of prohibited exploitative conduct that are common to human trafficking schemes, in accordance with the elements defined above: forced prostitution and child pornography; forced marriages; illicit organ trade; narcotics smuggling; forced begging or labor.

32. All CRS Staff are also prohibited from employment practices related to trafficking, including:

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a. Destroying, concealing, confiscating, or otherwise denying access to an employee’s identity or immigration documents.
b. Using misleading or fraudulent practices to recruit employees such as failing to disclose key terms and conditions of employment or charging employees recruitment fees.
c. Using recruiters that do not comply with local labor laws or charging employees recruitment fees.
d. Failing to provide return transportation to any employee specifically brought to a country for the purpose of working on a project.
e. Providing or arranging housing that fails to meet host country housing and safety standards.
f. Failing to provide a valid employment contract or work document where required by law.

33. CRS also prohibits Staff from knowingly obtaining work-related goods or services that have been provided or produced by trafficked or forced labor.

Sexual Activity

34. All sexual activity with a child, defined as a person younger than 18 years of age, is considered sexual abuse and is prohibited regardless of the age of majority or consent locally. Mistaken belief in the age of a child is not a defense.

35. In order to prevent sexual exploitation from occurring, CRS prohibits CRS Staff, Board Members, and affiliates, from buying sex (prostitution) by offering money, gifts, or other material support, regardless of the age or affiliation of the individuals selling sex.

36. Sexual relations between aid workers and program participants (of any age) are prohibited and are grounds for termination. The only exception is a mutual relationship between a local country program staff member\(^\text{14}\) and a local program participant; in such a case, the employee must fully disclose the relationship to their supervisor, human resources, or the Country Representative at the outset of employment or the relationship.\(^\text{15}\)

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\(^{14}\) Local country program staff member defined here as a CRS country program employee.

\(^{15}\) Relationships between a local country program staff member and a local program participant should be disclosed using Relationship Disclosure Form and added to the staff member’s personnel file. Further action may be necessary, i.e. where a Conflict of Interest is also present, but will be at the discretion of the Country Representative and Human Resources.
37. All staff must always ensure their relationships with program participants or potential program participants do not involve any form of sexual exploitation or abuse.

**Partners, Suppliers and Service Providers**

38. All agreements with partners must include the CRS Safeguarding Policy as an addendum and a provision in their agreement requiring adoption of the same or equivalent policy for their own organization. Partner agreements must also include, at a minimum, provisions requiring mandatory reporting to CRS of any allegations involving trafficking of persons, abuse or exploitation that pertain to programming or staff funded by CRS, or allegations that are not directly related to the programming or staff funded by CRS, but could be reasonably expected to impact the relationship between the partner and CRS, or the reputation of the partner or CRS.¹⁶

39. All suppliers and service providers must sign CRS’ Supplier and Service Provider Code of Conduct and adhere to any safeguarding specific terms and conditions within the supplier or service provider contract.

**Reporting**

40. All CRS Staff, Board Members, and affiliates are obligated to report any concerns or suspicions of any forms of harassment, abuse and exploitation described above involving CRS Staff, Board Members, affiliates, partners, program participants, suppliers, service providers or aid workers associated with another organization. The concern may be a result of witnessing the incident, being told of it, or being the object of it.

41. All such required reporters should report all concerns through any of the following channels:
   - Human resources (HQ or country program)
   - Supervisor
   - The Country Representative
   - Country program safeguarding designate¹⁷
   - Regional team: Regional Director, Deputy Regional Director for Management Quality, Deputy Regional Director for Program Quality

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¹⁶ These are the minimum CRS partner provisions on reporting; however, some donors, such as DFID, may require broader reporting, i.e. to include workplace harassment. Therefore, partner reporting provisions may be more robust to meet donor standards.

¹⁷ Country programs are encouraged to identify and communicate to all staff a safeguarding designate following guidelines provided by Ethics Unit.
• Safeguarding Ethics Unit colleagues: Safeguarding Director, Safeguarding Advisor
• The CRS whistleblower site where staff may submit an online report with option of anonymity.\(^{18}\)
• Email: alert@crs.org
• Skype: 1-866-295-2632
• Mail: (mark “Confidential)
  Attention:
  General Counsel
  Catholic Relief Services
  228 W. Lexington Street
  Baltimore, MD 21201

42. If an allegation involves physical assault or includes an imminent threat to physical safety, country program leadership or CRS’ Safety and Security Director may be the first point of contact, prior to reporting on the Whistleblower site. For any allegations received through the Whistleblower site with significant security concerns, CRS’ Safety and Security Director will be consulted.

43. Otherwise, all recipients of safeguarding allegations must log the case onto the Whistleblower site within 24-hours of occurrence or upon learning of the violation, unless the allegation concerns Ethics Unit or Human Resources staff.

44. Allegations concerning Ethics Unit staff should be reported directly to the Human Resources Director or Vice President of Human Resources. Any allegation concerning Human Resources staff may be reported directly to the Ethics Unit Director or CEO.

45. The reports of alleged safeguarding violations should include as much information as is readily available, such as:
  • Date, time and location of the incident
  • Nature of what happened
  • Any immediate help or actions required

46. Intentional false or malicious reporting may result in disciplinary action.  
47. CRS is committed to ensuring that program participants—and members of communities in which they live—are aware of what staff behavior is

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\(^{18}\) While anonymous reports are allowed, they can sometimes make follow-up difficult or impossible. Ethics Unit would work with the reporter and/or victim/survivor to address their concerns on safety, security and well-being to allow an investigation to proceed.
acceptable and how they can raise their concerns or questions in a confidential and secure manner. CRS will ensure communication is systematic throughout project planning; and community-based feedback and response mechanisms are established.

**Investigation**

48. CRS has zero-tolerance for inaction on Safeguarding allegations, which means all allegations will be promptly assessed and either referred to the appropriate agency (if an allegation involving another aid organization), investigated or otherwise addressed as appropriate to the type of allegation raised. This includes the investigation of credible allegations of an egregious\(^{19}\) nature pertaining to staff members no longer employed by CRS.

49. Staff, Board Members and affiliates are obligated to fully cooperate with an investigation. Allegations will be investigated in a safe and confidential, timely, thorough, and professional manner using CRS investigative protocols as outlined within the End-to-End/Safeguarding Allegation Management (SAM) Procedures.

50. The reporter and survivor (if not the reporter) will be notified of the steps that will be taken to assess the allegation. The survivor will also be provided with updates on the status of the case.

51. **Under no circumstances, should any of CRS Staff assess or investigate an allegation or a reported allegation on their own, outside of standard reporting protocols.**

**Confidentiality**

52. CRS acknowledges and respects the courage and trust associated with reporting allegations of misconduct. To the extent possible, CRS seeks to maintain the confidentiality of allegations, survivor/victim, reporter, witnesses and subjects of complaint, understanding confidentiality can be critical to safety/security, reputation and well-being.

53. It is important for all reporters to understand, however, that CRS may be legally mandated to follow up on certain allegations (with donors, or

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\(^{19}\) Egregious refers to those allegations that:

1) were they to be substantiated would otherwise result in serious disciplinary measures such as (but not limited to) termination; and/or

2) information available to the Agency suggests that the alleged conduct has had a demonstrably detrimental impact on the survivor.

The Safeguarding Director or their designate is responsible for determining if an allegation pertaining to a staff member no longer employed by the Agency reaches the threshold of egregious.
authorities in case of potential criminal offense) and that strict confidentiality cannot always be guaranteed due to the organization's moral and/or legal obligation to report and investigate.

54. CRS staff or others involved in an investigation (including the reporter, the subject of the complaint, the investigator(s) and anyone interviewed as a witness) have a duty to manage sensitive information in a manner that is respectful, professional, and that complies with applicable law, which may vary by location. Staff must keep all information about any suspected or reported incidents strictly confidential and divulge information only to a designated investigator. Failure to maintain confidentiality may be grounds for disciplinary action. The only exception being in instances where a survivor needs to disclose information in order to access necessary support and services.

Support to Survivors and Safety/Security

55. The support CRS provides to survivors will be in line with global ethical guidelines for timely, confidential, survivor-centered care that is responsive to the survivor's needs and preferences, while fulfilling organizational duty of care to staff and those that we serve. CRS will seek to protect survivors from stigma, discrimination, retaliation or other harmful consequences.

56. CRS will provide immediate and appropriate support to survivors of harassment, exploitation and abuse regardless of whether a formal internal response is carried out (such as an internal investigation). Support may include specialist psychosocial counselling20, a medical or legal referral, support to address security concerns, and/or access to other support, as needed and appropriate.

57. Further, in the case when CRS or the reporter believe that an investigation could put the reporter, survivor, witnesses or anyone else in danger, CRS will take reasonable steps to protect the safety and security of those at risk.

Non-Retaliation

58. Neither CRS nor its Staff will retaliate—in the form of an adverse employment action or harassment—against any individual reporting an allegation in good faith or participating in an investigation. Any form of

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20 For expatriate staff, options may include Employee Assistance Program and Headington Institute; for country program staff, options may include The KonTerra Group or locally sourced referral options.
retaliation may result in disciplinary action up to and including termination.

Adherence:

59. Full compliance with this Safeguarding policy is expected of all CRS Staff, Board Members, and affiliates. Failure to adhere to the provisions stated above may result in a range of actions and consequences, which for staff could include (but is not limited to): verbal warnings, written warnings, mandatory training or counseling, suspension, and/or termination of employment. Serious misconduct such as sexual abuse and exploitation as well as persistent and severe forms of harassment are cause for immediate termination.

60. Knowingly facilitating or aiding another aid worker to perform acts of exploitation or abuse is strictly prohibited and will be addressed in the same manner as when such an activity is undertaken directly by CRS Staff.

61. Depending upon the misconduct, context and local laws, CRS may report allegations and CRS investigative findings to donors and local law enforcement authorities.

Interpretation and Questions:

62. Questions on the interpretation of this policy—and any other questions—can be directed to the Ethics Unit Safeguarding Director.

Definitions:

- **Affiliate**: includes any US-based or overseas intern or volunteer working in service to CRS over a period of time, whether paid or unpaid, including Global Fellows, university interns, and others with a similar type of relationship to CRS. Also includes visitors; any individual working in a CRS office or traveling with or on behalf of CRS, regardless of their affiliation to the organization, which includes public and private donors, trustees, university faculty, seminarians and others with a similar association to CRS.

- **Abuse**: a deliberate act of ill treatment that can harm a person’s safety, well-being, dignity and development. It often involves individuals who have a relationship of responsibility and care for the victim including project staff, parents, guardians, teachers, community workers, health-care providers, religious leaders, friends or other children.\(^{21}\)

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\(^{21}\) Adapted from: *Better Care Network; Save the Children and UNICEF.*
• **Bullying**: persistent, repeated and targeted mistreatment of one or more persons by one or more perpetrators that may include threats; intimidation; public humiliation; persistent and unwelcome teasing; and/or abuse or use of power to undermine or humiliate.

• **Child**: anyone under the age of 18 years of age.

• **Child Abuse**: all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or other exploitation, resulting in actual or potential harm to the child’s health, survival, development or dignity in the context of a relationship of responsibility, trust or power.\(^{22}\)

• **Child Labor**: work that deprives children of their childhood, their potential and dignity. It includes work that is mentally or physically dangerous and/or interferes with their schooling.

• **Emotional Abuse**: harm done by persistent or severe emotional ill-treatment or rejection, such as degrading punishments, threats, bullying, and not giving care and affection, resulting in adverse effects on the behavior and emotional state/development of an individual or child.\(^{23}\)

• **Exploitation**: the use of force or other forms of coercion, abduction, fraud, deception, abuse of power or position of vulnerability; or the giving or receiving of payments or benefits to achieve the consent of a person having control over another person.\(^{24}\)

• **Harassment**: unwanted, unwelcomed and targeted behavior (may be verbal or physical conduct) that demeans, threatens or offends and results in a hostile environment. Usually, but not always, based on protected characteristics (race, color, religion, ancestry or national origin, sex, age, marital status, sexual orientation, physical or mental disability or handicap, medical condition, protected veteran status, or genetic information and any other status protected by law).

• **Neglect/Negligent Treatment**: Allowing for context and resources, the failure to meet the basic physical and/or psychological needs either deliberately or through negligence of a child or individual under the responsibility of the perpetrator.

• **Partner**: any entity formally engaged by CRS (under a grant, contract, cash contribution or memorandum of understanding) to implement programmatic deliverables for the purposes of improving outcomes of vulnerable populations.\(^{25}\)

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\(^{22}\) World Health Organization. 1999.


\(^{25}\) Entity may be local non-profit; community-based, faith-based or civil society organization; international non-profit or for-profit; academic institution; local or national government.
• **Physical Abuse**: non-accidental use of physical force that inadvertently or deliberately causes a risk of or actual injury or suffering. Physical force includes but is not limited to hitting, shaking, kicking, pinching, pushing/pulling, grabbing, burning, female genital mutilation, torture, and other physical acts.

• **Service Provider**: entity that provides services in exchange for payment, term most frequently used for specific categories of businesses such as consulting, legal advice, and telecommunications.

• **Sexual Abuse**: actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. All sexual activity with a child is considered sexual abuse.

• **Sexual Exploitation**: any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

• **Sexual Harassment**: a specific type of harassment (may be verbal, physical or visual) which can cross age and gender boundaries and may include unwelcome sexual advances; request for sexual favor; conduct or gesture of a sexual nature; or any other behavior of a sexual nature that might reasonably be expected/perceived to cause offense/humiliation, and when such conduct interferes with work; is made a condition of employment; or creates an intimidating, hostile work environment.

• **Stalking**: unwanted and/or repeated surveillance by an individual or group toward another person. Stalking behaviors are interrelated to harassment, bullying and intimidation and may include following or monitoring the victim.

• **Supplier**: entity that provides goods or services to another business or directly to the customer.

• **Survivor**: a person who has experienced or has been exposed to a safeguarding concern. “Survivor” is generally preferred in the psychosocial support sector – in contrast to the term victim - because it implies resilience.

• **Survivor-Centered Care**: care that is responsive to a survivor’s needs and preferences, and seeks to protect survivors from stigma, discrimination, retaliation or other harmful consequences.

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- **Trafficking**: the recruitment, transportation, or receipt of persons by means of deception, coercion, threat, or force for the purpose of exploitation such as for labor, prostitution, or sexual exploitation.\(^{29}\)
- **Victim**: a person who has experienced or has been exposed to a safeguarding concern. “Victim” is a term often used in legal and medical sectors.
- **Vulnerable Adult**: individuals whose life circumstances (e.g. poverty, education), and/or as a result of discrimination based on physical or social characteristics (sex, disability, age, ethnicity, religion, sexual orientation, etc.), have a reduced ability to withstand the adverse impact of external stressors.\(^{30}\)
- **Zero tolerance**: implies all allegations are assessed, investigated as needed, and appropriate action is taken.

**Related Policy and Resources:**

- Code of Conduct and Ethics
- CRS Whistleblower Policy
- Safeguarding Policy Roll-Out Priorities
- [Anti-Trafficking in Persons Compliance Plan](#)
- [Anti-Trafficking in Persons Compliance for USG Awards Procedure](#)

**Key Words:**

Safeguarding, conduct, harassment, bullying, sexual harassment, abuse, exploitation, child labor, trafficking, survivor, confidentiality, investigation, retaliation.


\(^{30}\) European Union. Humanitarian Aid definition.