

Catholic Relief Services (CRS) Policy on Safeguarding

Applies to:	All Staff, Board Directors, Affiliates, Visitors (Worldwide), (hereinafter referred to as “CRS Team Members” in this policy) and, Partners, Suppliers, and Service Providers-including Consultants (hereinafter referred to as “CRS Associates” in this policy)¹
Sponsor:	EVP, Global People Resources (GPR)
Created On:	June 1, 2020
Approved Revision:	March 15, 2023
Expiration Date:	March 15, 2026

I. Purpose:

1. Safeguarding is the responsibility that all organizations have to ensure that their programs² and staff, and those engaged by, in service to, or associated with the organization³ honor and protect the rights and dignity of all people—especially children and vulnerable adults—to live free from abuse and harm. Safeguarding includes preventing, reporting, and responding to harm caused by those employed by, in service to, or associated with CRS.
2. At CRS, this responsibility is paramount, given that safeguarding is integral to preserving and upholding the dignity of all human life and fostering and promoting social justice. This responsibility is firmly rooted in the mission and values of the Catholic Church and the belief that each individual has an equal and unique worth created in the image and likeness of God.
3. Safeguarding is fundamental to our identity as a humanitarian and development organization, given our commitment to protecting, empowering – and accountability to – those we serve and those with whom we work.
4. CRS recognizes that children – defined as anyone under the age of 18 – have increased vulnerabilities to violence, abuse, and exploitation due to their dependence on others and unequal power with adults. CRS is committed to child safeguarding and works to ensure that it is a child-safe organization.⁴
5. CRS is committed to creating and maintaining an environment – in our workplaces, in our programs, and in the communities within which CRS works,⁵ that promotes our core values. This means, in practice, creating and maintaining a culture of integrity, safety, accountability, respect, and inclusion, and actively working to prevent abuse and harm.⁶

¹ In the event that there appear to be conflicting provisions between this Safeguarding Policy and the Partner Safeguarding Policy and Procedure (PSPP) and/or CRS’ Supplier and Service Provider Code of Conduct applicable to CRS Associates, the latter govern and shall be the standard of conduct expected of them.

² Programs in this policy are also meant to include/encompass projects.

³ This includes all CRS Team Members and CRS Associates.

⁴ See Definitions in Annex 1 for the definition of a “child-safe organization.”

⁵ See Definitions in Annex 1 for the definition of “community in which CRS works.”

⁶ [CRS’ Respect, Equity, Diversity, Inclusion \(REDI\) principles and behavioral competencies](#) are foundational to a safeguarding culture.

II. Scope

6. **The CRS Safeguarding Policy applies to all CRS Team Members. Specific roles and responsibilities of CRS Team Members to operationalize this policy and create a safeguarding culture are detailed in Annex 2 of this policy.**
7. CRS is committed to working only with partners, suppliers, and service providers, including consultants (“CRS Associates”), who are equally committed to the safety and dignity of individuals, and who are vigilant about preventing, reporting, and addressing prohibited behaviors as outlined in this policy. As such, this policy also applies to CRS Associates with specific requirements detailed in Section V. *Partners, Suppliers, and Service Providers* of this policy.⁷
8. Whereas many CRS policies vary across regions—contextualized to locations and cultures—the CRS Safeguarding policy is globally binding. As such, CRS Country Programs and outreach offices are responsible for ensuring the review of CRS’ Safeguarding Policy against national law, raising and resolving issues with CRS’ Director of Safeguarding, and incorporating the policy into their local employment manuals.
9. This policy applies to CRS Team Members’ and CRS Associates’ activities and behaviors at work, outside work, and while on leave; it applies in all locations and at all times, on or off duty, to all CRS Team Members and CRS Associates while engaged by/associated with CRS, visiting CRS programs or country offices, or employed (in paid or unpaid work) by CRS.

III. Conduct between CRS Team Members, and between CRS Team Members and CRS Associates⁸

10. CRS Team Members and CRS Associates’ staff are expected to treat each other with respect and dignity, so as not to create a hostile working environment. The following behaviors are prohibited in the workplace/between CRS Team Members and CRS Team Members and CRS Associates:⁹
 - a. Harassment
 - b. Bullying
 - c. Sexual Misconduct, which includes:
 - i. Sexual Assault
 - ii. Sexual Harassment¹⁰

⁷ In the event that there appear to be conflicting provisions between this Safeguarding Policy and the Partner Safeguarding Policy and Procedure (PSPP) and/or CRS’ Supplier and Service Provider Code of Conduct applicable to CRS Associates, the latter govern and shall be the standard of conduct expected of them.

⁸ CRS strongly encourages CRS Associates’ offices to prohibit this conduct. CRS, however, will not investigate internal office dynamics in CRS Associates’ offices, but if serious allegations arise, CRS reserves the right to consider remedies up to and including termination of the working relationship with the CRS Associate in line with relevant legal standards.

⁹ See Annex 1 for specific definitions of prohibited behaviors. CRS Team Members and CRS Associates’ staff are also prohibited from engaging in this conduct with other aid workers and CRS reserves the right to investigate allegations of same with CRS Team Members. Additionally, CRS will consider remedies, in line with relevant legal standards, up to and including termination of the working relationship, should a staff member of a CRS Associate be found to be engaging in such conduct.

¹⁰ If CRS Team Members and CRS Associates’ staff engage in any form of abuse, attempted abuse, or exploitation of any kind in or outside the workplace CRS reserves the right to investigate allegations of same with CRS Team Members. Additionally, CRS will consider remedies, in line with relevant legal standards, up to and including termination of working with the CRS Associate should this occur by one of their staff.

Sexual and Romantic Relationships in the Workplace between CRS Team Members and between CRS Team Members and CRS Associates' Staff¹¹

11. Although romantic/sexual relationships in the workplace are not prohibited, such relationships must be entirely consensual and entered without any form of coercion, exploitation, or abuse of rank, position, or power and not impact professional duties or the working environment.
 - a. Because of the inherent power differences between persons in a supervisory, managerial, or leadership position and those who report to them (directly or indirectly through their line management), romantic or sexual advances by a supervisor, manager, or leader towards a direct report or someone in their line management will be viewed by CRS with concern.
 - b. CRS strongly encourages all CRS Team Members to report their romantic/sexual relationships with other CRS Team Members or with a CRS Associates' Staff to GPR ([Regional People Officer/HRBP](#)).¹² However, when a romantic/sexual relationship involves a leader, supervisor, or manager and a direct report or anyone in their line management, both CRS Team Members are required to report the relationship to their (next level) supervisor and GPR ([Regional People Officer/HRBP](#)) as soon as possible.¹³ This reporting is confidential and is meant to protect the CRS Team Members involved, and to ensure that perceptions of potential misconduct (including conflicts of interest and perceived preferential treatment) can be addressed before they arise.
 - c. Relationships between CRS Team Members and between CRS Team Members and CRS Associates' staff that are not formally disclosed and that involve a manager, supervisor, or leader with a direct report or anyone in their line management or that may entail an actual or potential conflict of interest¹⁴, may be investigated as a breach of the requirement to disclose under this policy, as potential sexual misconduct, or as a potential breach of the [Conflict-of-Interest Policy](#).¹⁵

Labor Practices of CRS Team Members and CRS Associates¹⁶

12. All CRS Team Members and CRS Associates are prohibited from employment practices related to human trafficking at all times, including, but not limited to:

¹¹ Adapted from Mercy Corps Sexual Misconduct in the Workplace Policy and Church World Service (CWS) Code of Conduct Policy.

¹² Mandatory disclosure is required if the relationship presents an actual or perceived [Conflict of Interest](#). This disclosure is meant to protect staff from allegations of impropriety that may arise and will be strictly confidential. In the case of a relationship between a CRS Team member and a CRS Associate, the CRS Team Member is encouraged to report the relationship, and the CRS Team Member must report the relationship if there is a direct or indirect supervisory role or possible conflict of interest. The CRS Associate is not required to report the relationship to CRS. Any disclosures should be made using the [Workplace Relationship Disclosure Form](#), which is added to the staff member's personnel file.

¹³ Disclosures should be made using the [Workplace Relationship Disclosure Form](#), which is added to the staff member's personnel file.

¹⁴ Including where the CRS Team Member participates in contracting the CRS Associate or may be perceived to or actually influence the contracting process. The CRS Associate is not required to report the relationship to CRS; the CRS Team Member is.

¹⁵ CRS Team Members are encouraged and welcome to speak to the Director of Safeguarding confidentially for guidance on disclosure, including where there are sensitive cultural issues or laws that cause concern for those disclosing.

¹⁶ CRS reserves the right, in line with local legal standards, to terminate contracts with CRS Associates who do not abide by labor practices set out in this policy.

- a. Destroying, concealing, confiscating, or otherwise denying access to a CRS Team Members'/CRS Associates' immigration, travel, or personal identification documents.
 - b. Using misleading or fraudulent practices to recruit CRS Team Members'/CRS Associates' such as failing to disclose key terms and conditions of employment or charging applicants recruitment fees.
 - c. Using recruiters that do not comply with local labor laws or charge applicants' recruitment fees.
 - d. Failing to provide return transportation to any CRS Team Member/CRS Associate specifically brought to a country for the purpose of working on a program.
 - 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.
13. CRS Team Members and CRS Associates are also prohibited from knowingly obtaining work-related goods or services that have been provided or produced by trafficked or forced labor.
 14. CRS Team Members are prohibited from employing children under the age of 18 for any role in CRS' workplace and prohibits the funding of programs in which children under 18 are working/employed.
 15. CRS Team Members are otherwise prohibited from hiring children under the age of 15 for any personal/non-workplace related tasks regardless of any perceived benefit to the child or the child's family. If a child is under the age of 18, tasks for which the child is hired should not include work that is mentally or physically dangerous or hazardous and/or interferes with their schooling (See the Child Safeguarding section).
 16. CRS Associates are expected not to exploit/benefit from a child or forced labor and are expected to respect the basic social rights and working conditions in the countries in which they work, as well as international standards with respect to child labor.
 17. In this regard, CRS Associates are prohibited from employing children under the age of 18 in mentally or physically dangerous or hazardous work or work that interferes with compulsory schooling. Further, CRS Associates are prohibited from employing children under the age of 15 in full-time work.

IV. Conduct of CRS Team Members and CRS Associates with the Community within which CRS works

18. CRS Team Members and CRS Associates are prohibited from engaging in all forms of:
 - a. Exploitation
 - i. Sexual Exploitation
 - ii. Child Labor
 - iii. Human Trafficking
 - b. Abuse and attempted abuse
 - i. Sexual abuse
 - ii. Physical abuse
 - iii. Emotional abuse
 - iv. Neglect

With program participants, community members, and other persons in communities within which CRS works.¹⁷

19. In order to prevent sexual exploitation from occurring, CRS prohibits all CRS Team Members and CRS Associates from buying sex (prostitution) by offering money, gifts, or other material support in exchange for sex/sexual relations, regardless of the age or affiliation of the individuals selling sex, and regardless of whether prostitution or buying sex is legal or not.

Sexual and Romantic Relations between CRS Team Members and Program Participants/Community Members

20. Sexual and romantic relations between aid workers and program participants (of any age) are prohibited and are grounds for termination. The only exception is a consensual, mutual relationship (where there is no abuse of power, rank, or position) between a local country CRS Team Member and a local adult program participant; in such a case, the CRS Team Member must fully disclose the relationship to their supervisor and to GPR ([Regional People Officer/HRBP](#)) at the outset of the employment (paid or unpaid) or the relationship.¹⁸ This reporting is confidential and is meant to protect the CRS Team Member involved and to ensure that perceptions of potential misconduct can be addressed before they arise.

Child Safeguarding

21. CRS is committed to conducting its programs and operations in a manner that is safe for children. CRS Team Members and CRS Associates must create and proactively maintain an environment that aims to prevent, deter, and lessen the risk of exploitation or abuse of children and report and respond when concerns and violations against children arise within their area of responsibility.
22. All CRS Team Members and CRS Associates are explicitly prohibited from knowingly engaging in any activity that they could have reasonably foreseen to result in any kind of harm, exploitation, or abuse of children.
23. All sexual and romantic activity with a child, defined as a person younger than 18 years of age, is considered sexual abuse and is prohibited in all places and at all times, both during and outside of working hours, regardless of the age of majority or consent locally. Mistaken belief in the age of a child is not a defense.
24. CRS specifically prohibits the use of corporal punishment in all its programs.

V. Partners, Suppliers, and Service Providers

25. CRS will only partner with organizations, institutions, and entities that are equally committed to safeguarding.
26. Agreements between CRS and partners must include provisions requiring obligatory reporting to CRS of any allegations involving the trafficking of persons, exploitation, or abuse, including

¹⁷ CRS Team Members and CRS Associates must also not engage in harassment and bullying of program participants, community members, and other communities with whom and within which CRS works, and CRS reserves the right to investigate allegations of same as well as any of the prohibited behaviors set out in section IV of this policy.

¹⁸ Relationships between a local country program CRS Team Member and a local adult program participant should be disclosed using [Workplace Relationship Disclosure Form](#), which is added to the staff member's personnel file. Further action may be necessary, i.e., where a Conflict of Interest is also present (please see the [Conflict of Interest Policy](#)) but will be at the discretion of the Country Representative and Human Resources.

sexual exploitation and abuse, 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.¹⁹

27. 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.
28. Partners, Suppliers, and Service Providers, subject to the Partner Safeguarding Policy and Procedure (PSPP), must also comply with the requirements set out within it.
29. Consultants must sign CRS' Safeguarding Policy included in the Consultant Contract Agreement and adhere to safeguarding specific terms and conditions within the consultant contract.

VI. Reporting

30. All CRS Team Members and CRS Associates are obligated to report any concerns or suspicions of prohibited behavior as detailed and defined in Annex I of this policy involving CRS Team Members, CRS Associates, or aid workers associated with another organization. The concern or suspicion may be a result of witnessing the incident, being told of it, hearing about it directly or indirectly, or being the object of it.²⁰ Failure to report may result in disciplinary action, up to and including termination, for CRS Team Members, and may result in the termination of contracts or association with CRS Associates.
31. All such required reporters should report all concerns through any of the following channels within 24 hours of receiving the concern:
 - Global People Resources (Baltimore, region, or country program) – verbally or in writing
 - Their supervisor - verbally or in writing
 - CRS Country Representative - verbally or in writing
 - The safeguarding designates in the Country Program or HQ Department²¹ - verbally or in writing
 - Regional team: Regional Director, Deputy Regional Director for Operations, Deputy Regional Director for Program Quality, Regional People Officer - verbally or in writing
 - Safeguarding Ethics Unit colleagues: Safeguarding Director, Safeguarding Advisors- verbally or in writing
 - The CRS Whistleblower site ([Ethicspoint](#)) where staff may submit an online report with the option of anonymity.
 - Email: alert@crs.org
 - Skype: 1-866-295-2632
 - Mail: (mark "Confidential")

¹⁹ These are the minimum CRS partner provisions on reporting; however, some donors may require broader reporting, i.e., to include workplace harassment. Therefore, partner reporting provisions may be more robust per specific donor requirements.

²⁰ The only exception is if a CRS Team Member or CRS Associate is a survivor of an incident and chooses not to report their own case.

²¹ Country programs and HQ teams are encouraged to identify and communicate to all staff a safeguarding focal point for reporting following guidelines provided by Ethics Unit.

Attention:
General Counsel
Catholic Relief Services
228 W. Lexington Street
Baltimore, MD 21201

32. All recipients of safeguarding allegations (those listed in paragraph 31) must log the case onto the Whistleblower site ([Ethicspoint](#)) within 24 hours of occurrence or upon learning of the violation unless the allegation concerns Ethics Unit or Global People Resources staff.²²
33. Allegations concerning Ethics Unit staff should be reported directly to the Global People Resources Director of People Operations. Any allegation concerning Global People Resources staff may be reported directly to the Safeguarding Director or the CEO. Any allegations concerning CRS Leadership may be reported to the Safeguarding Director or via [Ethicspoint](#).
34. If an allegation involves physical assault or includes an imminent threat to physical safety, country program leadership or CRS' Health, Safety, and Security Director may be the first point of contact (and should be involved as early as possible), prior to reporting on the Whistleblower site. For any allegations received through the Whistleblower site with significant health and safety concerns, CRS' Health, Safety, and Security Director will be consulted.
35. 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.
 - Persons involved in, witnessing, or who have knowledge of the incident.
 - Any immediate help or actions required.
36. Intentionally false or malicious reporting is an abuse of the system and CRS resources and may result in disciplinary action, up to and including termination.
37. CRS is committed to ensuring that program participants and members of communities in which they live, are aware of acceptable CRS Team Member behavior and how they can raise any concerns or questions about CRS Team Member behavior in a confidential and secure manner. CRS will ensure communication is systematic throughout program planning; and accessible, child-friendly, community-based feedback and response mechanisms are established.

VII. Investigation

38. 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 egregious²³ nature pertaining to CRS Team Members no longer employed or engaged by CRS that occurred while employed by, working with, or engaged by CRS.

²² If unable to access the Whistleblower site, they should contact the Ethics Unit or Global People Resources.

²³ Egregious refers to those allegations that:

39. All CRS Team Members and CRS Associates are obligated to fully cooperate with an investigation. CRS is committed to investigations that are safe, confidential, timely, thorough, and professional, and in accordance with CRS' Safeguarding Allegation Management (SAM) Procedure.
40. The reporter and survivor (if not the reporter) will be notified of the steps taken to assess the allegation.²⁴ The survivor will also be provided with updates on the status of the case, as will the subject of the complaint.
- 41. Under no circumstances should any of CRS' Team Members or CRS Associates assess or investigate an allegation or a reported allegation on their own, outside of standard reporting protocols.**

VIII. Confidentiality

42. CRS acknowledges and respects the courage and trust associated with reporting allegations of misconduct. To the extent possible, CRS seeks to maintain the confidentiality²⁵ of allegations, survivor/victim, reporter, witnesses, persons of knowledge, and subjects of complaint; understanding confidentiality can be critical to the safety/security, reputation, and well-being of all involved.
43. It is important for all reporters to understand, however, that CRS may be legally mandated to follow up on certain allegations (with donors or 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.
44. CRS Team Members and CRS Associates involved in or otherwise aware of an investigation (including the reporter, the subject of the complaint, the investigator(s), and anyone interviewed as a witness or person of knowledge) 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. CRS Team Members and CRS Associates 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, up to and including termination. The only exception is in instances where a survivor needs to disclose information to access necessary support and services.

IX. Support to Survivors and Safety/Security

45. 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

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 Director of Safeguarding 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.

²⁴ The reporter will have the complaint acknowledged and be informed that an investigation will take place and when it is closed. For confidentiality reasons, the reporter will not receive details of the outcome of the case.

²⁵ Confidentiality is distinct from anonymity. It means having restrictions on access to and disclosure of information, i.e., limiting the information and details to those who "need to know."

preferences, while fulfilling the organizational duty of care to CRS Team Members and those that we serve. CRS will prioritize protecting survivors from stigma, discrimination, retaliation, or other harmful consequences.

46. CRS will provide immediate and appropriate support to survivors of safeguarding incidents regardless of whether a formal internal response is conducted (such as an investigation). Support may include psychosocial support, a medical or legal referral, support to address safety and security concerns, and/or access to other support as needed and appropriate.
47. Further, in the case when CRS or the reporter believes that an investigation could put the reporter, survivor, witnesses, subject of complaint, or anyone else in danger or otherwise at risk of physical or psychological harm, CRS will take reasonable steps to protect and support those at risk.

X. Non-Retaliation

48. Neither CRS nor CRS Team Members nor CRS Associates will retaliate—in the form of an adverse employment action or harassment—against any individual reporting an allegation with reasonable suspicions or participating in an investigation. Any form of retaliation is grounds for disciplinary action up to and including termination of employment or engagement.

XI. Adherence:

49. Full compliance with this Safeguarding policy is expected of all CRS Team Members and CRS Associates. Failure to adhere to the provisions stated above may result in a range of actions and consequences, which could include (but are not limited to): verbal warnings, written warnings, mandatory training or counseling, suspension, and disciplinary sanctions up to and including termination of employment/ending of engagement/association with the individual, organization, entity, or institution. Serious misconduct such as (but not limited to) sexual abuse and exploitation, sexual misconduct, sexual or romantic relationships with a child, exploitation of a child, as well as persistent and severe forms of harassment and bullying are typically cause for immediate termination of employment or engagement by/association with CRS.
50. 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 a CRS Team Member or CRS Associate directly undertakes such an activity.
51. Depending upon the misconduct, context, and local laws, CRS may report allegations and CRS investigative findings to donors and local law enforcement authorities.

XII. Interpretation and Questions:

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

Related Policy and Resources:

- [Code of Conduct and Ethics](#)
- [CRS Whistleblower Policy](#)
- [CRS Whistleblower Site \(Ethicspoint\)](#)
- [CRS References for Employees Policy](#)
- [Conflict of Interest Policy](#)
- [Partner Safeguarding Policy and Procedure](#)
- [MEAL Policy and Procedures](#)
- [CRS Feedback, Complaints, and Response Mechanism Guidance](#)

Key Words:

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

Annex 1: Definitions

Prohibited Behaviors

1.1 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 survivor/victim, including program staff, parents, guardians, teachers, community workers, health-care providers, religious leaders, friends, or other children. Abuse may include:

- i. **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.
- ii. **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.
- iii. **Sexual abuse:** actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. All sexual and romantic activity with a child is considered sexual abuse.
- iv. **Neglect/Negligent treatment:** allowing for context and resources, the failure to meet the basic physical and/or psychological needs either deliberately or through the negligence of a child or individual under the responsibility of the perpetrator.

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.).

1.2 Attempted Abuse:

The intentional act of trying to engage in abuse, whether physical, emotional, or sexual abuse, but for some reason the abuse does not actually take place. It includes predatory behavior that makes it easier for an offender to use or obtain a child or vulnerable adult for sexual activity. Such behavior often involves building the trust of children and/or their caregivers, or a vulnerable adult, to gain access to them in order to sexually abuse them. For example, it includes attention paid to a specific child or adult, providing gifts, money, drugs, or alcohol to them, encouraging romantic relationships with them, or exposing them to sexual concepts through conversation or exposure to pornography.

1.3 Bullying: is behavior that is:

- i. persistent, repeated, *and*
- iii. targeted

mistreatment of one or more persons by one or more perpetrators.

Bullying 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.

1.4 Child Labor

Child labor is work that deprives children of their childhood, potential, and dignity, and that is harmful to their physical and mental development. It includes work that is mentally or physically, socially, or morally dangerous and harmful to children and/or interferes with their schooling by:

- depriving them of the opportunity to attend school;
- obliging them to leave school prematurely; or
- requiring them to attempt to combine school attendance with excessively long and heavy work.

1.5 Corporal Punishment

Defined by the United Nations Committee on the Rights of the Child as “any punishment in which physical force is used and intended to cause some degree of pain or discomfort, however light.”

1.6 Exploitation

The abuse of power or trust to use a person for the benefit of another using force, coercion, abduction, deception, manipulation, or other means of abuse of trust or power. Exploitative behavior includes, but is not limited to, sexual exploitation, human trafficking, child labor, slavery, and child marriage/early and forced marriage.

1.7 Harassment

Refers to verbal or physical conduct or behavior that is:

- i. unwelcomed, *and*
- ii. targeted

that demeans, threatens, or offends and results in a hostile environment. General harassment is not sexual in nature and may consist of verbal, written, or physical conduct that insults or shows hostility or aversion towards an individual or group of individuals.

Usually, but not always, harassment is based on protected characteristics (race, color, religion, ancestry or national origin, sex, gender, 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).

A particular form of harassment is **stalking**, which is 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.

1.8 Human 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.

1.9 Sexual Exploitation

Any actual or attempted abuse of a 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.

1.10 Sexual Misconduct (between CRS Team Members and between CRS Team Members and CRS Associates), which includes:

i. Sexual Assault: The term sexual assault refers to sexual contact or behavior that occurs without the explicit consent of the survivor. Some forms of sexual assault include attempted rape, rape, forcing a survivor to perform sexual acts, such as oral sex or penetrating the perpetrator's body. It may also include non-penetrative acts such as masturbation, kissing, rubbing, fondling, or unwanted sexual touching.

ii. Sexual Harassment: is a specific type of harassment which can cross age and gender boundaries and includes, but is not limited to, unwelcome romantic or sexual advances, requests for sexual favors, and other verbal or physical conduct of a romantic or sexual nature, where one of the following applies:

- a. Where submission to such conduct is made either explicitly or implicitly a condition of an individual's employment/assignment or reaction to such conduct by an individual is used as the basis for employment/assignment decisions affecting such individual; *or*
- b. Where the conduct has the purpose or effect of interfering with an individual's work performance or creating an intimidating, degrading, hostile, or offensive work environment.

Sexual harassment can happen in-person or by phone, email, through social media or other electronic communication.

Other Definitions

1.11 Affiliate includes any US-based or overseas intern working in service to CRS over a period of time, whether paid or unpaid, including Global Fellows; university interns; secondees from other organizations, institutions, or entities; and others with a similar type of relationship to CRS.

Affiliate also includes:

1.11a. Volunteer, A person who is not employed by CRS but who chooses, without remuneration, to contribute their time, skill, and knowledge to CRS' work. 'Volunteer' includes, but is not limited to, a volunteer in a CRS office, a 'community volunteer' who volunteers on behalf of their community to fulfill the community's responsibilities in an ongoing CRS program.

1.11b. Incentive Worker A person who is provided with an incentive (financial, food, or otherwise) to do tasks for CRS that have a temporary and voluntary character. Incentive workers may, for example, be people with refugee status, internally displaced peoples, returnees, or members of the host community who are working for CRS by doing tasks in return for incentives.

1.12 Board Director includes all members of the CRS Corporate Board and the CRS Foundation Board of Directors.

1.13 Child is anyone under the age of 18 years of age.

1.14 Child-Safe Organization²⁶

A child safe organization consciously and systematically:

- Creates an environment where children’s safety and well-being are at the center of thought, values, and actions.
- Places emphasis on genuine engagement with and valuing of children and young people.
- Creates conditions that reduce the likelihood of harm to children and young people.
- Creates conditions that increase the likelihood of identifying any harm.
- Responds to any concerns, disclosures, allegations, or indications of harm.

1.15 Community within which CRS works: CRS uses a broad definition of this term to ensure that any individuals in the area where CRS works or has programs and who may be subject to power imbalances with CRS Team Members or CRS Associates are protected by this policy.²⁷

1.16 Consultant is a specific category of service providers, are professionals who provide advice and other activities in an area of specialization. Consulting services generally fall under the domain of professional services as contingent work.

1.17 CRS Associates include CRS partners, service providers, and suppliers.

1.18 CRS Team Members include CRS Staff, Board Directors, Visitors, and Affiliates (paid or unpaid).

1.19 Partner, for the purposes of this policy, is defined as any entity formally engaged by CRS (Under a grant, sub-recipient agreement, or contract) that implements programmatic deliverables for the purposes of improving outcomes of vulnerable populations.²⁸

1.20 Service Provider is an entity that provides services in exchange for payment, a term most frequently used for specific categories of businesses such as consulting, legal advice, contracted services providing security or cleaning, and telecommunications.

1.21 Subject of Complaint is a person who is alleged to have breached an article or articles of this policy.

1.22 Supplier is an entity that provides goods or services to another business or directly to the customer.

²⁶ Adapted from Child Safe Organizations Project

²⁷ Adapted from World Vision: Partnership Management Policy: Child and Adult Safeguarding.

²⁸ Entities may be local non-profit; community-based, faith-based, or civil society organizations; international non-profit or for-profit; academic institutions; local or national government.

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

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

1.25 Visitor is any individual working in a CRS office or traveling with or on behalf of CRS or visiting CRS offices or programs regardless of their affiliation to the organization. A visitor refers to a range of persons, including, but not limited to, public and private donor representatives, university faculty, journalists, media, researchers, celebrities, politicians, family members, seminarians, and others with a similar association to CRS.

1.26 Victim is a person who has experienced or has been exposed to a safeguarding concern. “Victim” is a term often used in the legal and medical sectors.

1.27 Vulnerable Adult is an individual whose life circumstances (e.g., poverty, education), and/or as a result of discrimination based on physical or social characteristics (sex, gender, disability, age, ethnicity, religion, sexual orientation, etc.), has a reduced ability to withstand the adverse impact of external stressors.²⁹

1.28 Zero tolerance implies all allegations are assessed, investigated as needed, and appropriate action is taken.

²⁹ European Union. Humanitarian Aid definition.

Annex 2: Roles and Responsibilities of CRS Team Members

All CRS Team Members (as defined in this policy) are responsible to:

- Know, understand, and abide by the specific requirements of the policy, its specified standards and spirit, and engage in learning opportunities to develop knowledge of safeguarding concepts and responsibilities.
- Understand risks and signs of misconduct or breaches of CRS' Safeguarding Policy within their local context and area of work.
- Understand obligatory reporting requirements and immediately (within 24 hours) report all concerns and suspicions of safeguarding policy violations through established reporting channels (but should not, under any circumstances, investigate allegations).
- Apply a survivor-centered approach when observing or receiving an allegation of a safeguarding violation; respond to a survivor reporting a violation with respect and confidentiality.
- Complete safeguarding training within 45 days of being hired and complete assigned refresher safeguarding trainings.
- Cooperate fully with any safeguarding investigation and maintain complete confidentiality about the allegation(s) and the investigation(s).
- Not retaliate against anyone reporting a safeguarding violation or anyone participating in/providing information to a safeguarding investigation.

CRS Management: Executives, Vice Presidents, Divisional Directors, Regional Directors, and their Deputies, Country Representatives/Managers, and Senior Management in all countries and areas where CRS operates are responsible to:

- Role models the standards of conduct and behavior required by this policy.
- Champion a culture of awareness and reporting about safeguarding through consistent messaging and by creating opportunities for additional learning.
- Ensure that allegations about breaches of this policy are taken seriously, treated confidentially, and immediately reported to the Ethics Unit through established reporting channels.
- Ensure that anyone who reports safeguarding allegations or participates in/provides information to safeguarding investigations does not face adverse employment decisions.
- Ensure that a survivor-centered approach is widely understood and consistently applied.
- Champion safe recruitment practices and the CRS reference policy.
- Champion a diverse and inclusive workforce that demonstrates capacity in [key safeguarding capabilities](#).
- Ensure that the performance management of staff supports an accountable and safe organizational culture to prevent all forms of misconduct under this policy.
- Ensure relevant [safeguarding capabilities](#) are included in staff performance and development plans, identify and share resources for learning, and coach staff to practice safeguarding behaviors across their areas of responsibility.
- Oversee the implementation of this policy and apply institutional learning to develop and improve upon strategies to prevent misconduct within their country/region/department/area of operation, including with partners and suppliers.

- Implement disciplinary/corrective action that is consistent and proportionate to substantiated allegations.
- Ensure that there are sufficient resources available across the organization to support the effective implementation of this policy.

CRS Country Representatives/Managers are also responsible to:

- Ensure the review of CRS' Safeguarding Policy against national law, raising and resolving issues, and clearly documenting the resolutions/adaptions with CRS' Director of Safeguarding and incorporating the policy into their local employment manuals.
- Ensure that referral pathways are up to date for their country's programs.
- Ensure that there are sufficient resources for safeguarding-related prevention and response within their country program, including appropriate staffing requirements and Community Feedback and Complaints Reporting Mechanisms (FCRM).
- Ensure that safe and accessible, child-friendly reporting channels exist, are closely monitored, and that they are known about, adapted to, and accessible to all relevant stakeholders within their country/region/department/area of operation.
- Ensure that CRS' partners comply with CRS' Partner Safeguarding Policy and Procedure.

CRS Heads of Operations are also responsible to:

- Ensure supplier/service provider compliance with CRS' Supplier Code of Conduct and Partner Safeguarding Policy and Procedure, including safeguarding related reporting requirements.
- Ensure consultants acknowledge and sign CRS Safeguarding Policy included in the Consultant Agreement.
- Ensure the application of safe recruitment practices and the CRS reference policy and procedures.

CRS Heads of Programs are also responsible to:

- Be aware of and create linkages to in-country prevention of sexual exploitation and abuse (PSEA)/safeguarding resources and referral networks.
- Oversee programming risk assessments for safeguarding and protection and ensure that a comprehensive risk mitigation strategy is developed, operationalized, and monitored across multiple areas of responsibility.
- Ensure that there are accessible, child-friendly feedback and complaints mechanisms in place for every program, adapted to communities' preferences and the context.

CRS Program Managers are responsible to:

- Consult with communities with whom CRS works (in a safe, accessible, and culturally appropriate way) to ensure that community members and those working on behalf of CRS are familiar with CRS' Code of Conduct and expected behaviors, how to raise complaints and concerns, and that CRS will act when misconduct happens.
- Clearly explain what goods and services the community members are entitled to and how they are selected.
- Conduct project-level safeguarding and protection risk assessments and implement comprehensive risk mitigation strategies.

- Monitor project-level safeguarding risks and adjust the mitigating measures as necessary.
- Ensure that there are accessible, child-friendly feedback and complaints mechanisms in place for every program, adapted to communities' preferences and the context. And that feedback and complaints are managed in an efficient and appropriate manner.

Monitoring, Evaluation, Accountability, and Learning (MEAL) Managers are responsible to:

- Ensure that appropriate escalation and management procedures are in place for community-based feedback and response mechanisms.
- Ensure confidentiality and triage of sensitive complaints.

CRS Human Resources staff are responsible to:

- Conduct safe recruitment for all CRS team members, meaning:
 - Conduct reference checks (professional and/or personal), inclusive of Global People Resources (GPR) approved safe recruitment questions on applicants (for paid and unpaid positions). Reference checks should include former supervisors whenever possible.
 - Include a requirement for applicants (paid or unpaid) to self-declare/disclose prior sexual or other misconduct and termination of past employment.
- Ensure awareness and application of the [CRS' Policy on Providing References for Current and Former Employees](#).
- Ensure all CRS new hires (paid and unpaid) receive an orientation on the Safeguarding Policy and acknowledge receipt of it upon hiring.
- Ensure and track that all CRS new hires (paid or unpaid) complete mandatory safeguarding training within 45 days of hire and refresher safeguarding training as assigned.
- Ensure that all job or role descriptions for all CRS Team Members– whether paid or unpaid, full-time or part-time, temporary or long-term – include a requirement to abide by CRS' Safeguarding Policy.
- Incorporate [safeguarding capabilities](#) in job descriptions and identify candidates in recruitment processes who demonstrate capabilities for all paid and unpaid positions.
- Ensure disciplinary/corrective action that is consistent and proportionate to substantiated allegations.

The Ethics Unit/Safeguarding Team is responsible to:

- Lead periodic reviews of this policy and ensure the policy and procedures are in-line with industry standards.
- Provide ongoing capacity strengthening to staff (paid and unpaid) to effectively implement this policy.
- Work with senior management across departments and in overseas operations on policy implementation and compliance.
- In-take and response to safeguarding reports and investigation of credible allegations, in-line with CRS' Safeguarding Allegation Management (SAM) procedures and international best practices and standards.
- Provide ongoing capacity strengthening to staff to respond to safeguarding reports.

- Effectively collaborate across departments and teams to strengthen CRS prevention efforts.