



SAFEGUARDING POLICY

2025

HIVOS SAFEGUARDING POLICY

2025

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ACRONYMS

GDPR	General Data Protection Regulation
ILO	International Labour Organization
PSEAH	Protection from Sexual Exploitation, Abuse and Harassment
SCoP	Safeguarding Community of Practice
SFP	Safeguarding Focal Points
SOGIESC	Sexual Orientation and Gender Identity and Expression and Sex Characteristics

INTRODUCTION

Hivos believes that human life in its many forms is valuable, and people in all their diversity have potential and talent. Living a life with freedom and dignity, with respect for each other and the planet leads to greater individual and collective well-being and fair and vibrant societies.

We cooperate with various partners across four continents on a variety of projects that can be large scale and long term, but also small and experimental: our strength lies in diversity, and with a diverse team and stakeholders also comes the great responsibility of ensuring everyone feels safe and included.

However, working across the world and across cultures faces us with the need to have clear standards that anyone interacting with Hivos can learn about and align with. Together with our partners we seek to promote social change in innovative ways, and because of this we are aware of the heightened risks many of the people we work with and face in certain contexts, due to their ethnic origin, age, sex, sexual orientation and gender identity and expression and sex characteristics (SOGIESC), disability or HIV status, position, etc.

This Safeguarding Policy provides clear definitions, sets standards across the organization, and gives clear guidance on its implementation for Hivos and its partners.

1. OBJECTIVES

This policy has three main objectives:

- a) Keeping the people we work for, including both children and adults, our partners, and our staff safe.
- b) Preserving the positive reputation of Hivos, including protecting all staff who represent Hivos around the world from false accusations or from operating within an unclear safeguarding framework.
- c) Ensuring the highest standards of behavior from representatives and staff and minimizing the risk of people who have been the subjects of concern of credible allegations of SEAH, physical and psychological violence, escalation of harassment and discrimination, entering the organization.

2. HIVOS VALUES AND PRINCIPLES

Any person holds relative privilege, and any person is a potential victim.

This is a strong statement, but it is crucial to place safeguarding as “everyone’s concern”: depending on the context, or on the position a person is in, they may hold more power than someone else or be subject to someone else’s decisions. Understanding that the situation can radically change our position is key to understanding that our actions have consequences, and that the system in which we work must be capable of protecting everyone.

Hivos is a member of Partos, the Dutch membership body for organizations working in international development. All members sign their code of conduct and a quality statement (ISO9001- Partos). Hivos is active in the committee of Partos to develop a common policy on integrity. This includes a report system, the investigation procedure, and sanctions.

CORE VALUES



FREEDOM & DIGNITY — Every human being has the right to live in freedom and dignity, regardless of their sexual orientation, ethnicity, religion, or socio-economic position. People should have the freedom to believe what they want and be who they are, voice their opinions, and challenge and influence the established order.



RESPONSIBLE CITIZENSHIP — People have rights, duties, and responsibilities. We must respect and take care of other people, nearby and far away, and live life without damaging the common good, including nature.



SELF- DETERMINATION & DIVERSITY — People and communities should be able to make choices and decisions based on their own preferences and interests. Each individual is unique, and these individual differences are something to cherish and protect.



EQUALITY & SOCIAL JUSTICE — People are not the same, but we are equal. We should be treated and treat others as such. Equality should be reflected in the way our social, economic, and legal systems work.



SUSTAINABLE USE OF OUR PLANET'S RESOURCES — We only have one planet, with a rich but fragile biodiversity, and vast but finite resources. If we want current and future generations to prosper, sustainable use of the earth and living in balance with nature are paramount. We must move beyond reducing negative impacts and work actively to restore and preserve the environment, its biodiversity, and the planet's natural resources. The future of every living creature depends on this.

3. SAFEGUARDING CONTEXT AND DEFINITIONS

Safeguarding is the individual and collective act to promote and protect the health, well-being, and human rights of people in all their diversity, thus enabling them to live free from harm, exploitation, and abuse.

Hivos is acutely aware that harm can also be done inadvertently and involuntarily, and it is our responsibility to prevent and respond to any form of it, even when it comes from actions taken in good faith.

Our approach (defined more in depth in Section 6 – Hivos commitments) looks at safeguarding on a spectrum: from how people need to be informed about risks and how to mitigate them, all the way to actions that must be taken after an incident has occurred.

By looking at **awareness and prevention** we work towards risk mitigation. With standardized **reporting and triage** we can swiftly review any complaint and assess whether it is a safeguarding issue (based on the definition below plus specific details provided by the person reporting) or if it should be addressed elsewhere. A comprehensive and structured **response** allows us to expedite processes (investigation or mediation) with a survivor centered approach, confidentiality, and neutrality. Lastly, in the **follow-up** phase we can ensure that all people who were involved in the process, such as the victim/survivor, the subject of concern, and all the witnesses, have sufficient feedback and support to move on, within or outside Hivos, in the best possible way.

The international definition of safeguarding includes:

- Physical violence and denial of basic rights
- Sexual Exploitation, Abuse and Harassment (SEAH)
- Child protection (i.e., any act of negligence and/or violence perpetrated against a person below 18 years of age, irrespective of the age of majority in the country)
- Modern slavery
- Human trafficking

Let us break down the exact definitions (for more detail, Annex II of this policy is a more comprehensive glossary of terms).

Child protection	<p>The protection of anyone under 18 from denial of rights, harm, and abuse. Abuse may occur through direct contact, indirectly (i.e., the subject of concern acts through a third party), or online and with or without the knowledge of the child. It can include one or any combination of: physical, emotional abuse, neglect, SEAH. Any sexual activity with children (persons under the age of 18) is considered sexual abuse, even if it was agreed upon or even initiated by the child.</p> <p>A pillar of child protection is ending child marriage. Hivos condemns any sexual interaction between an adult and a child, even if in the context of marriage.</p> <p>Child protection also looks at protecting children from forced labor, (ILO Conventions n. 138 and n. 182), relating under what circumstances people below the age of 18 are allowed to work).</p>
Denial of basic rights	<p>Preventing any person from accessing basic human rights (healthcare, education, nutrition, safety, etc.) with force, coercion, or blackmailing.</p>

Human trafficking	<p>The recruitment, transportation, transfer, harboring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.</p> <p>Exploitation includes, at a minimum, the exploitation or prostitution of others, or other forms of sexual exploitation, forced labor or services, slavery, or practices like slavery, servitude or the removal of organs. Often, victims of trafficking have their ID taken away from them and their freedom of movement limited. It does not have to involve cross border transfer to qualify as human trafficking.</p>
Modern slavery	<p>The definition of modern slavery includes any form of labor whose provider is unpaid for or unfairly retributed (i.e., retribution below poverty line) and it can be identified as: bonded labor, debt bondage, involuntary domestic servitude, child labor, the recruitment and deployment of child soldiers, and sex trafficking (including of children).</p>
SEAH	<p>Unwelcome actual or threatened conduct of a sexual nature, which has the purpose, or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating, or offensive environment. Such conduct may take place on a single occasion or on several occasions.</p> <p>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. It also includes demands for inappropriate photographs, filming, without a person's consent and forced exposure to pornography.</p> <p>SEAH covers also revenge porn and sextortion, and in general any actual or threatened public sharing of personal images, audio, or videos of unknowing and/or non-consenting parties.</p>

More definitions regarding safeguarding can be found in ANNEX II - Glossary.

4. SAFEGUARDING PILLARS

Safeguarding hinges on principles that must be shared in order to broaden accountability (of individuals, organizations, and businesses). These principles include:

- a. **Do not harm:** While we strive to go beyond doing no harm, and achieve positive impact, it is paramount to always do what is possible to minimize the harm our presence and service provision may cause inadvertently, both in the moment we perform our work and also in the future, if we have been negligent in mitigating risks.
- b. **Zero tolerance policy:** Keeping people safe is the first pillar to humanitarian and development work, therefore every credible safeguarding incident must be investigated. However, zero tolerance policy is not a one-size fits all concept: it means that every subject of concern who is found guilty will receive a sanction commensurate to their offense.
- c. **Survivor centered approach:** This approach places the rights, wishes, needs, safety, dignity and well-being of the victim/survivor at the center of all prevention and response measures concerning sexual exploitation and abuse and sexual harassment.
- d. **Neutrality:** The role of the safeguarding team is ONLY to investigate and verify information, not to represent the interests of any of the parties involved, therefore if the safeguarding manager or any person in the safeguarding team has a conflict of interest, it should be disclosed before the investigation process begins.
- e. **Right to privacy and confidentiality:** For the benefit of all, no information about the people involved (directly or indirectly) in an investigation, parts of their statements, or support documents can be shared beyond the need-to-know basis. The term "need-to-know basis" refers to people either managing the subject of concern or in charge of the management of their contract – who, if the investigation finds the person guilty, will need to act on the recommendations of the final report. No other names will be disclosed. In the context of the investigation all documents will be anonymized and the codes that represent the people involved saved in a separate password-protected file in order to mitigate any possible risk of leaking information.

While Hivos takes safeguarding very seriously and is committed to preventing incidents and responding to all complaints with empathy, compassion and in a timely manner, it is important to define what safeguarding is, and what it is not.

In Section 2 we have cleared that safeguarding is an umbrella term that can define each, all, and any combination of: physical violence and denial of basic rights; Sexual Exploitation, Abuse and Harassment (SEAH); child abuse; modern slavery; and human trafficking. Both victim/survivors and alleged offenders can be Hivos staff members, community members or partners.

Hivos is committed to the safety of all people associated with the organization, therefore a report of a safeguarding incident is followed up even if none of the people involved is directly employed by Hivos (e.g. a partner's staff member allegedly participated in the exploitation of one or more people; employees from two different partner organizations allegedly assaulted a community member; etc.).

What safeguarding does not cover are issues related to personal conflicts in the workplace, issues that spark from HR issues (poor performance review, challenging the issuance of a warning, a performance improvement plan, divergent opinions on the reasons why a contract is not extended/renewed). These are issues that should be resolved with the direct supervisor or the HR manager, and any of the parties involved can first request support and guidance from the confidential adviser, as well as request their presence as a witness or, if they feel the relationship is strained, a mediation process can be arranged. However, none of these issues can be classified as safeguarding.

The following list tries to explain, as exhaustively as possible, why some personal choices have repercussions on the lives of communities we are committed to serve, and ultimately on the image of the organization, and therefore why Hivos takes a strong stand on them, requiring compliance from all people working -directly or indirectly- with us.

- **Acquiring sex services in exchange for money and/or profiting from another person's sex work:** Hivos recognizes that in countries where sex work is legalized people can freely choose to sell sex, at a fair price, at their own conditions and with laws protecting their work and welfare. However, Hivos acknowledges that, where poverty and systemic and structural violence drive many people, including children, into selling sex, or where external conditions may hinder the freedom, consent and well-being of people selling sex, it is not always possible to ascertain whether a person selling sex does it as a free choice. Therefore, it remains a person's choice whether or not to acquire sex in exchange for money, but it's their personal responsibility to prevent the fueling of exploitative practices (i.e. ensure that the person selling sex is above 18, they have freedom of choice, they are not victims of trafficking and can negotiate the conditions of the exchange). Profiting, monetarily or otherwise, from another person's sex work is prohibited.
- **Transactional sex:** Any form of soliciting sexual favors in exchange for goods, services, promises of work, etc. between two people whose power dynamics place one of the two in a substantially more powerful position is considered exploitation. It is underlined that power is contextual and not objective, therefore this clause doesn't only refer to people who are professionally in a higher position, but rather to any person who, in a certain context, is in the position to exercise power over another person (or people) and obtain sexual favors in exchange for something that is needed or wanted without a fair opportunity to negotiate the terms of the exchange.
- **Relationships between staff members are strongly discouraged but not prohibited:** Relationships in the same line of supervision must be disclosed to the immediate supervisor of the most senior person to ensure that the party in the weaker position is not being coerced into a relationship, and to prevent and manage the possible backlash (e.g. rumors, questions about one's professionalism, etc.). This protects all parties involved: it is confirmed that the relationship is consensual (and not transactional), and arrangements are made so that the most senior person in the relationship is not accused of favoritism and lack of transparency in decision making.
- **Relationships with stakeholders are strongly discouraged and must be immediately disclosed, failing to disclose may lead to sanctioning measures:** It is imperative that any person working with Hivos acknowledges the inherent power they may hold in certain settings. Where power relations are unequal it is very difficult for the organization to draw the line between romantic involvement and the exploitation of a weaker party, or the benefit gained from the relationship. We are aware that people cannot control who they fall in love with, but our role is to protect all people, especially those who are more at risk of being exploited. A strong power imbalance is often a strong enabling factor for exploitation.
- **Child marriage is prohibited (even in countries where the legal age for marriage is below 18 years):** No person working for Hivos can marry or be married to a person under the age of 18, even when the national laws allow it.

- **Fair employment of support staff (for domestic help, childcare, etc. as well as partners' employees):** It is expected that any person employed by a Hivos team member or Hivos partner is employed, whether formally or informally, with fair conditions concerning their working hours, weekly rest days and annual leave and is fairly compensated in accordance with the country's salary scale for the type of role. Any provision of service that does not respect basic rules of fair employment is considered exploitation and, in extreme cases, modern slavery. If the person providing the service has been relocated against their will, under false or inaccurate promises, and/or if their ID has been taken by the employer, the aggravating factor of human trafficking is considered.

5. ROLES AND RESPONSIBILITIES

NOTE: In an effort to prevent any breach of privacy of all parties involved, personal information that can help identify them will NOT be written in the final report and supporting documentation. Only the people who must know the identities of the people involved to perform their duty of care (e.g., protect survivors or potential victims, prevent a subject of concern who is under investigation to receive a promotion, etc.) will be informed.

This applies to donors as well: while donor reporting will be done according to the guidelines provided by each donor, Hivos prohibits the sharing of personal information of people involved in safeguarding investigations with any internal or external party, including donors.

In the context of safeguarding, the following table establishes with clarity which people are involved and in what capacity:

Professional figure	Role
Safeguarding Focal Points	Can support a person who wishes to report misconduct through the process and advise if reporting is the best solution given the circumstances. If other routes are chosen by the victim/survivor (without any pressure from the SFP), the safeguarding focal point will inform the safeguarding manager to ensure they are explored.
Confidential Advisor	Can be approached, confidentially, to support and advise employees (including interns and consultants) who experience problems with inappropriate behavior and aggression, harassment, bullying, discrimination, other traumatic experiences at work and integrity within Hivos. If the issue concerns safeguarding, and the victim/survivor wishes to report it, the confidential advisor can help them through the process or report on their behalf.
Safeguarding Manager	Receives the report and based on the triage, can either conduct the investigation and draft the final report or opt for proposing a mediation process, which they will conduct. Provides guidance through the process to the relevant people in charge of HR decisions. Depending on the situation and the relationship with the donor, the safeguarding manager will report the incident/outcome of

	<p>the investigation directly to the donor or will ask the person managing the relationship with the donor to do so.</p> <p>If a report is made against the SM their direct supervisor will secure an external investigator and not inform them of the allegation until the investigator requires their statement.</p>
Regional Directors /Director Global Hub	<p>They are informed as soon as a credible safeguarding incident is reported (unless they are the subject of concern, in which case their direct supervisor is informed) and will have to communicate to the parties involved the final outcome of the investigations and decisions stemming from it, with the support of the Safeguarding Manager.</p>
Global Head of People (and Regional People Managers)	<p>Are informed of every credible safeguarding incident being reported and on the process. They are responsible for HR decisions during and after completion of the investigation process (e.g., suspension with or without pay; termination of contract of individual or partner, etc.)</p> <p>If the Global Head of People or Regional People Managers are named as subjects of concern, the information will be shared with their direct supervisor, and they will not be notified until the investigator requires their statement.</p>
Executive Board	<p>Is informed of credible allegations and receives an anonymized quarterly report on safeguarding cases. It is important the EB is regularly informed to ensure the Supervisory Board has access to information if need be.</p> <p>Depending on the case the EB may contribute to making the final decision, in agreement with the Regional Director, and the Global Head of HR, based on the findings of the report.</p> <p>The EB is not informed if either the CEO or the COO (or both) are the subject of concern.</p>
Supervisory Board Chairperson	<p>Is only contacted directly by the Safeguarding Manger if the report names a member of the EB as a subject of concern, to avoid all forms of possible abuse of power that could occur.</p>

6. HIVOS COMMITMENTS

6.1 Awareness and Prevention

Safeguarding prevention begins with awareness: Hivos is fully committed to ensuring that every staff member, as well as third parties, are aware about what safeguarding is, what Hivos does to promote it, how to report misconduct and what to expect from the investigation process.

Training and onboarding: Hivos has developed a safeguarding e-course (available on the learning platform), which is mandatory for all staff, including Safeguarding Focal Points, HR managers and Regional Directors, as well as for all Global Heads and the Executive Board. All recruitment of staff will include a full induction to the safeguarding policy and code of conduct, including procedures to follow should any safeguarding concern arise. Upon request, a more comprehensive and context specific version of this training can be integrated with an in-person or virtual workshop.

Safeguarding Community of Practice: Safeguarding Focal Points are to be appointed at regional level and trained on a monthly basis. They will form a Safeguarding Community of Practice (SCoP) that can disseminate awareness about safeguarding, support people who choose to report misconduct and, at a later stage and following specific training, be involved in investigations.

Staff vetting: Prevention also entails ensuring that all people hired by Hivos, irrespective of the role and duty station, and for any amount of time, are vetted and pose no safeguarding threat to the people they will work with and for.

Business Development: Preventing safeguarding incidents also goes through designing projects that mitigate initial risks and have inbuilt structures to respond to incidents in a timely manner. Hivos has a safeguarding checklist and traffic light mechanism that can be used by any person developing a new proposal to assess the degree of risk of the project area, partner, and activities, and to propose appropriate risk mitigation measures. More on this in Section 8 – Safeguarding mainstreaming.

Awareness: All Hivos representatives and partner organizations should be duly notified of the Safeguarding Policy and be made aware of how they are expected to comply with it. The policy / a summary of the policy will be translated into the relevant national languages of the countries Hivos operates in.

6.2 Reporting and triage

Anyone directly or indirectly associated with Hivos can report misconduct allegedly perpetrated by a Hivos team member, by a Hivos partner or vendor.

Reports can be made anonymously and on behalf of other people (both as witnesses, or if for example the person who would like to report is unable to read and write). Any report made in good faith cannot be sanctioned, even if the outcome of the investigation did not find any evidence of the misconduct. Conversely, if a report is made in bad faith, with the intent to discredit and bring ill-repute to a colleague or a party associated with Hivos the matter will be treated as a harassment and the person who made the initial report will be placed under investigation to ascertain the motives for such action.

To ensure that safeguarding issues are addressed with a standardized approach that is line with international standards, and that they are adequately prioritized, only reports made through the reporting structure (NotMe) will be filed and taken up, based on the urgency established in the triage process.

Before filing a complaint, people are encouraged to reach out to the Safeguarding Focal Points (SFP), the Safeguarding Manager or to the Confidential Advisors to assess if their complaint is consistent with a safeguarding incident (and therefore should be reported) or if it pertains to a different type of complaints.

Whether or not the person reporting chooses to disclose their identity, the Hivos Safeguarding Team will protect their identity and the information they have provided confidentially, structuring the case so that information can be anonymized before confronting the subject of concern.

Once the report is submitted the person reporting will receive confirmation of receipt and a case number through which they can follow the stages of the process and, if need be, request information.

When the report is received, it is triaged in relation to its actual safeguarding nature, gravity, and urgency and if the case requires an investigation (or, based on the preference of the victim/survivor) mediation, the person reporting the incident is immediately contacted, if known. The safeguarding Manager is also in charge of checking if the person reporting and/or the victim/survivor needs psychological or other medical support or legal redress and if so, organizing it.

6.3 Response

The response to a safeguarding incident starts within 24 hours of receiving a complaint with the triage of the report, which is then assigned to the safeguarding manager.

Hivos commits to closing each investigation within 8 weeks from the receipt of the report. This time frame may vary based on availability of parties involved, but we are aware of the delicate situations that may arise from an open investigation and on the cost of work disruptions, therefore the aim is to run the process as accurately as possible in the shortest possible time.

Hivos believes that the number of people involved in the process should be as limited as possible, in order to maintain confidentiality.

Annex I defines visually what steps are to be expected during an investigation, here is a brief description of each step:

- a) The report is received, triaged by the Global Safeguarding Manager and/or Global DEI Manager (internal/through NotMe);
- b) The Safeguarding Manager informs the Global Head of People and the Executive Board of the incident, with context but without sharing identifying information. The same information is shared with the Regional Director where the incident occurred, if relevant. This step is necessary to ensure that, if necessary, measures are put in place to prevent escalation and recrudescence, e.g., suspend duty travel of the alleged subject of concern, require work from home for the victim/survivor, link them to services, etc.
- c) An investigation plan is drafted, and it comprises of:
 - i Calendarized list of people to interview and their role.
 - ii Interview structure for each person.
 - iii Creation of a case management logbook, where all interactions are recorded (through NotMe).
 - iv The Subject of concern is always to be interviewed at the very last stage.
- d) A final report (CHS Alliance structure) is drafted and completed with recommendations, and shared with the Global Head of People, the Executive Board, and the Regional Director if relevant, so that a decision concerning the way forward can be made by all professional figures jointly.

Throughout the process, depending on the severity of the allegations, the probability of escalation or exposure to risk of third parties, one of the two parties involved may be requested to work from home or be suspended with pay (subject of concern only). This is decided in accordance with the Regional Director or Global Head of People for the NL office.

If the report concerns a person who is not directly employed by Hivos (e.g., an employee of a partner organization, a vendor, etc.) the process follows a different path:

- a) The report is received, triaged by the Safeguarding Manager (through NotMe);
- b) The Safeguarding Manager informs the Global Head of People and the Executive Board of the incident, with context but without sharing identifying information. The same information is shared with the Regional Director where the incident occurred, if relevant.
- c) The partner's safeguarding manager/Head of HR/EB is:
 - i. Informed of the report against one of their employees;
 - ii. Requested to inform Hivos about their internal processes and how they intend to proceed in this instance; and
 - iii. Offered support with the case management, if necessary.
 - iv. If the partner is open to receiving the report and has strong safeguarding systems in place the investigation is left to them, with a request to remain informed and disclose the findings and follow up action.
 - v. If the partner does not have robust safeguarding systems in place but is willing to accept Hivos' support in running the investigation, Hivos requires that a staff member of the partner organization be assigned to the case (for transparency) and the Hivos the internal process is mirrored.
 - vi. If the partner doesn't have robust safeguarding systems in place and isn't willing to accept Hivos support in running the investigation, Hivos can decide, on a case-by-case basis whether or not to continue the partnership.

6.4 Follow-up

At the end of the investigation the victim/survivor and/or the person reporting and the subject of concern are informed of the end of the process and of the decisions made on a need-to-know basis.

Irrespective of the outcome of the investigation no personal information will be divulged, to preserve the confidentiality and privacy of all parties involved, including the subject of concern. Should the investigation prove the subject of concern innocent beyond any reasonable doubt no record of the investigation will be recorded in the employee's file. Conversely, should the investigation end with no sufficient evidence or proof of guilt, but not dismissal, the case will be recorded in the employee's file to ensure that, in the case of a second report on a similar issue, there can be a history to refer to.

All investigations will be recorded in the Hivos/NotMe logbook, irrespective of their outcome, for analysis purposes. Any data extracted from said logbook (e.g., to draft a safeguarding section for the Annual Report) will be anonymized.

If other people (i.e., the team) were affected by the investigation they are informed of the end of the process and given the option to access support if need be.

7. DISCIPLINARY MEASURES

Hivos believes in a person-centered approach that considers the context as well as the unique conditions that have contributed to an incident. Only by considering all the nuances can we ensure every subject of concern gets sanctioned in a way that is commensurate with their offence and, if the case allows for it, from which they can learn.

Sanctioning measures can range from and be any combination of the following:

- **Verbal or written warning**, for minor offences where the good faith of the offender proven (e.g., cultural differences in interpreting appropriateness of behaviors)
- **Demotion or reassignment to a different team** (e.g., with no contact with project participants, if the offense was triggered by access to vulnerable communities).
- **Suspension** (with or without pay, to be decided on a case-by-case basis and in alignment with national labor laws).
- **Dismissal, following the national labor law procedure for it.** The Hivos General Terms and Conditions clearly state that the organization has the right to terminate contracts without notice or compensations if the employee or the third party (partner, vendor, etc.) is involved in Child labor, SEAH, openly discriminating on the base of ethnic or national origin, religion, caste, sex, gender identity, age, sexual orientation, HIV or disability status.

Hivos has no legal or executive power, and it is the victim/survivor's choice to report the subject of concern to local authorities as well at any step of the process (i.e., at the same time as they report internally, during the investigation process, after the matter has been investigated, etc.). Hivos might choose to support the victim/survivor in seeking legal redress, on a case-by-case basis, where the conditions allow it and were doing so will not pose a threat to the human rights or life of the subject of concern.

8. SAFEGUARDING MAINSTREAMING

Safeguarding cannot happen in a vacuum; therefore, different sectors need to be involved.

8.1 Risk and compliance

A safeguarding risk assessment shall be conducted as part of the routine due diligence with every new partner, and with former partners who are engaging with Hivos in new interventions. The risk assessment is based on a checklist (ANNEX III) which, once completed, can lead to a decision on whether a partner is suitable for Hivos.

8.2 Business Development

In order to ensure that every new project proposal is inclusive of a comprehensive analysis of safeguarding risks, and proposed mitigation measures, the R&C checklist will be complemented by a project safeguarding risk checklist (ANNEX IV). The result of the assessment will lead to a traffic light approach to be included in the proposal, with three basic steps:

- Low risk: Acknowledgement and basic safeguarding awareness
- Medium risk: Safeguarding awareness and training of partners
- High risk: Safeguarding awareness, training of partners by safeguarding focal points and safeguarding manager, and specific activities based on the safeguarding needs of the area, community, and project.

8.3 Human Resources

Hivos has made a conscious decision not to become a signatory of the Misconduct Disclosure Scheme but is strongly committed to identifying potential risks to its staff and stakeholders.

For this reason, the application process has been integrated with questions regarding safeguarding investigations in which the candidate was the subject of concern, and it is specified that Hivos reserves the right to do random checks with a candidate's previous employer to verify the information. Misrepresenting a candidate's own position will automatically exclude them from the recruitment process.

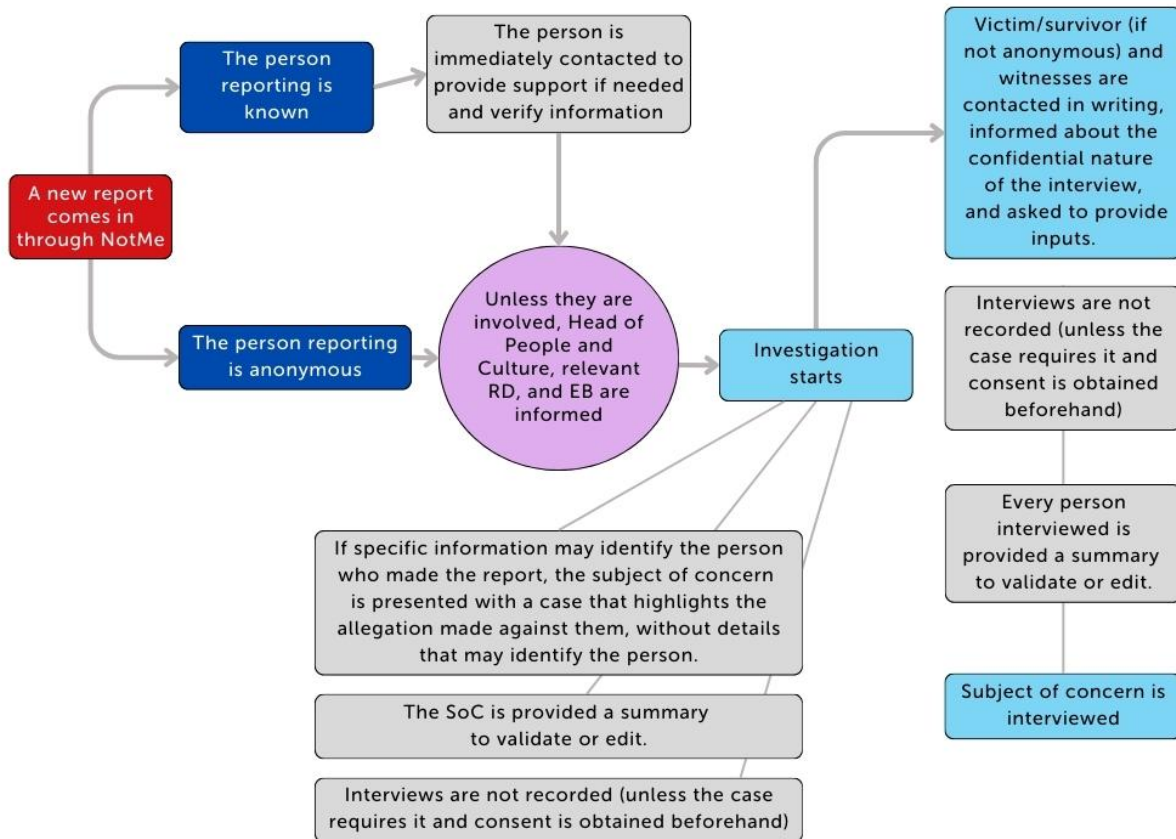
ANNEXES

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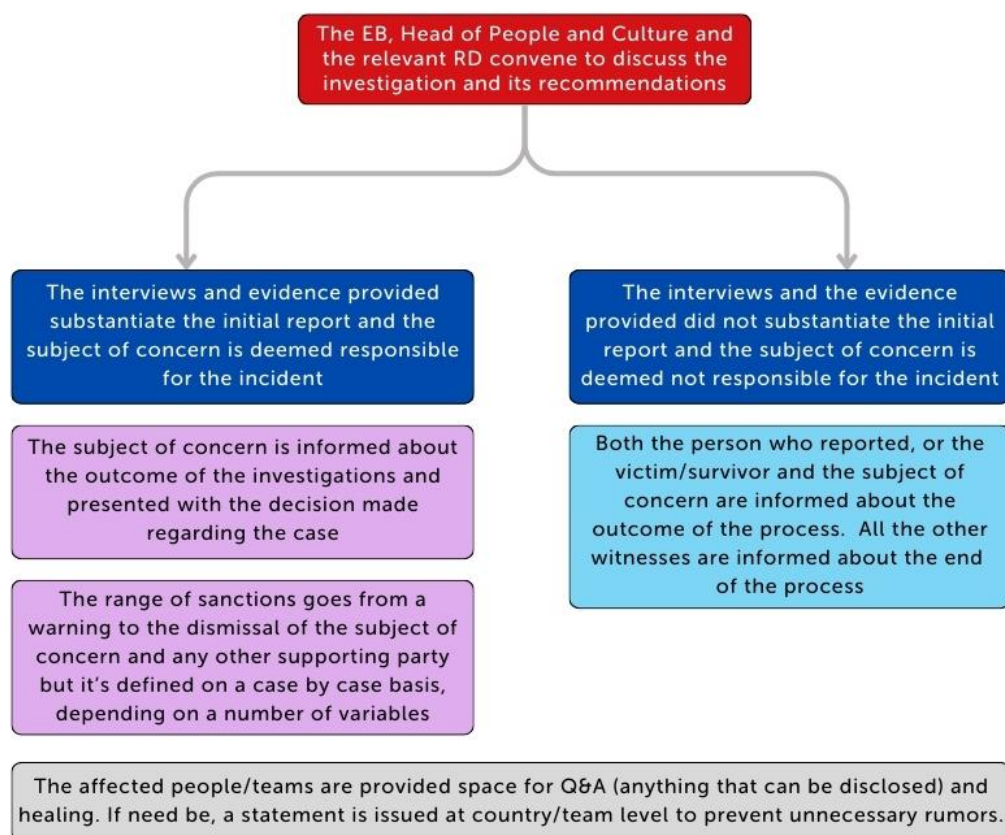
ANNEX I

REPORTING FLOW

SAFEGUARDING REPORTING AND INVESTIGATION



WAY FORWARD



ANNEX II

GLOSSARY

Term	Definition
Agency	Agency is the capacity of a person to freely make decisions and act in a given environment, and it's dependent both on a moral dimension and on the opportunities an individual is given in a certain social structure to freely make choices and influence decisions that affect their lives.
Bullying	Is the use of exclusion, coercion, hurtful teasing or threat, to abuse or intimidate. It's usually a repeated behavior (but it can also be occasional/one off) and often driven by an actual or perceived imbalance of physical or social power.
Conflict management/Mediation	Managing conflicts is paramount to create and maintain a healthy work environment: while it would be ideal to prevent conflicts from happening, it's equally important to be able to defuse interactions which could escalate into more complex situations. A third party is usually involved in the role of the mediator, to ensure that even when the parties may have exhausted their own tools of relationship management, the external party can weigh in with a neutral and more balanced approach, ensuring everyone's interests are taken into account.
Disability	<p>The UN Convention on the Rights of Persons with Disabilities (CRPD) is the guiding international framework in understanding and approaching disability. The CRPD describes people with disabilities as encompassing: Those who have long-term physical, mental, intellectual or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others.</p> <p>The social model of disability is central to the CRPD and also in-line with most donors' strategies for strengthening disability-inclusive development. The social model 'understands that disability arises not from impairment (i.e. problems in body functions or structures) alone, but from the interaction between a person's impairment and the barriers they face to full participation in their community on an equal basis with others. The CRPD also recognizes that disability is an evolving concept: understandings of and responses to disability by societies have been different over time and across contexts, but all of them must implement reasonable accommodations to remove environmental barriers to achieve the full participation to public life of people with disabilities.</p>
Discrimination	Any distinction, exclusion or restriction that has the purpose or effect of impairing or nullifying the recognition, enjoyment or exercise, on an equal basis with others, of human rights and fundamental freedoms in the political, economic, social, cultural, civil or any other field. Non-Discrimination - This legal principle prohibits the less favorable treatment of individuals or groups, or detrimental impacts on such individuals or groups based on prohibited grounds.

Diversity	<p>Ensuring our workforce's composition is the reflection of the communities we serve and are represented accordingly in the different levels of the organization. Diversity is represented by one or more characteristics that make an individual different to the majority: it can relate to sexual orientation, gender identity, ethnicity, HIV or disability status, etc. HIVOS values diversity as an opportunity to foster growth and enrich its human capital.</p> <p>NOTE: It's important to distinguish between the majority and the norm - The majority only represents the highest number of people with one or more characteristics. The norm is a social construct that every society or subgroup sets for itself and which people can choose to align with or not, but it's very dependent on context. Likewise, diversity is dynamic and contextual concept.</p>
Equity	<p>Recognizing structural inequalities and removing barriers to ensure fair treatment and equal access to opportunities for everyone.</p> <p>It can be understood as the fair treatment of all population groups in society and fairness in the distribution of costs, benefits, and opportunities based on their actual needs. While at times this term is used interchangeably with "equality", it's important to underline the difference hinging on the concept of fairness, therefore of every person getting what they need to reach the optimum, not of all people receiving the same type and quantity of support.</p>
Ethics	<p>The literal definition of Ethics is "the set of moral principles that control or influence a person's behavior", however this is limiting when applied to a field as wide as development, as the term is also applied to any system of principles, therefore a lot more complex than a single individual's behavior.</p> <p>Ethics deals with the fundamental value of actions (and their outcomes) and whether they are considered "right" or "wrong".</p> <p>What makes this particularly challenging -and demands a standard that everyone can identify themselves with and comply with- is that population groups and subgroups can have very different concepts of morality, and define their social contracts accordingly.</p>
Exclusion	<p>The most extreme form of marginalization, which can be an active action (i.e. to do something to exclude someone) or passive (i.e. to refrain from doing something which will include an otherwise excluded person). People who are denied access to a place, group, privilege or service; also implies a power dynamic where a more powerful person/group is in the position of excluding others.</p>
Feminism	<p>Feminism is a complex set of ideologies and theories, that seeks to achieve equal social, political, and economic rights for women and gender minorities. Although feminism benefits everyone, its aim is first and foremost to achieve equity for women and gender minorities, with the assumption that prioritizing those who are statistically more subject to denial of services and violence leads in the long term to a more just and equitable world for all.</p>
Gender Based Violence - GBV	<p>Gender Based Violence is any form of emotional, psychological, social, physical and sexual violence perpetrated against women or the LGBTQIA+ community, because of their (perceived or actual) sex, gender, sexual orientation and/or under the assumption that their actual or perceived identity or orientation will justify the perpetrator's impunity.</p>

Gender Mainstreaming	Is the process of assessing the implications for women and men of any planned action, including legislation, policies, or programs, in all areas and at all levels. It is a strategy for making any gender's concerns and experiences an integral dimension of the design, implementation, monitoring and evaluation (M&E) of policies and programs in all political, economic, and societal spheres so that women and men benefit equally, and inequality is not perpetuated. The goal is to achieve gender equality.
Gender norms	Socially constructed expectations and roles associated with gender, which dictate how individuals are "supposed" to behave, present themselves, or engage based on societal perceptions of masculinity, femininity, or other gender identities. Gender norms often reinforce binary categories of male and female, but in a non-binary context, they are understood to be fluid, inclusive, and diverse. Internalized early in life, gender norms can establish a life cycle of gender socialization and stereotyping.
GESI Aware	When a project examines and addresses gender and social inclusion considerations in some way (can be positive or negative) in its design and or implementation.
GESI integration	Strategies applied in program planning, assessment, design, implementation, and M&E to consider gender and social norms and to compensate for gender- and socially based inequalities. For example, when a project conducts a GESI analysis and incorporates the results into its objectives, work plan and M&E plan, it is undertaking a GESI integration process.
GESI Responsive	Programming that challenges inequitable gender and social norms. Responds to the different needs and constraints of individuals based on their gender and sexuality. Opens space for discussing, challenging, and engaging with inequitable gender and social structures, systems, divisions, and power relations.
GESI Sensitive/accommodating	When a project acknowledges and works with or around gender and social norms in its design and or implementation. Aware of the effect of leveraging inequitable gender norms for the outcomes of programming.
GESI Transformative	When a project critically addresses and works to positively change gender and social inclusion relations to promote equality in both its design and implementation. Not only has the ambition to transform gender and social inequalities, but has the resources, willingness, and capacity to institutionalise transformative programming.
GESI Unaware/blind/neutral	When a project does not take any gender or social inclusion considerations into account in design and or implementation.
Harassment	Is any unwelcome action of any nature (sexual or otherwise) that might reasonably be perceived to cause offence or humiliation to another and create an intimidating, hostile or offensive work environment. It may occur between persons of the opposite or same sex and/or gender. People of any gender can be either the victims or the offenders. While typically involving a pattern of behavior, it can take the form of a single incident.

Human Rights-Based Approach	A human rights-based approach builds on “a conceptual framework for the process of human development that is normatively based on international human rights standards and operationally directed to promoting and protecting human rights.” A human rights-based approach identifies rights holders and their entitlements and duty bearers and their obligations. It works towards strengthening the capacity of rights-holders to participate in decision-making and claim their rights, and that of duty bearers to meet their obligations.
Human trafficking	It's the act of transferring people against their will to different parts of the country or to other countries for the purpose of forced labor, sexual exploitation, forced marriage. HIVOS has a zero-tolerance policy for any aspect of modern slavery, and human trafficking.
Inclusion	Ensuring that everyone, particularly those from marginalized groups, feel safe, valued and supported to bring their best self to work. In spite of the actions taken to promote equity, and the good intentions, inclusion cannot be "demanded" but it is always and only based on the perception of the person we try to include.
Intersectionality	The complex, cumulative way in which the effects of multiple forms of discrimination (such as racism, sexism, and classism) combine, overlap, or intersect especially in the experiences of socially marginalized individuals or groups. Like diversity, also intersectionality is dynamic and contextual, therefore the same person could be more or less likely to be marginalized depending on the context, situation, time, etc. they are in.
Socially marginalized individuals and groups	Are those people who are excluded from social, economic, cultural and political life, including basic service provision because of who they are, their profession, their lifestyle and life choices, etc. In some countries, marginalized individuals and groups can include a significant proportion of the population, for example, women. This term can also refer to a cultural or ethnic minority, or people suffering from particular stigmatized diseases.
Modern Slavery	Modern slavery is an umbrella term for all sorts of actions that involve forcing an individual into a certain situation from which someone else will profit. This includes trafficking in persons (human trafficking), sexual slavery, forced/bonded labor, child labor. HIVOS has a zero-tolerance policy against modern slavery.
Patriarchy	Patriarchy is a social system in which (traditionally cisgender) men hold primary power and predominate in roles of political leadership, moral authority, social privilege and control of property. Patriarchy is usually associated with an ideology that acts to explain and justify this dominance and attributes it to inherent natural differences between men and women.
PSEAH	The acronym stands for Prevention of Sexual Exploitation Abuse and Harassment. This refers to actions by HIVOS staff, partners and vendors perpetrated against HIVOS staff, partners, vendors and members of the communities HIVOS works in and for. HIVOS has a zero-tolerance policy against SEAH.
Safeguarding	Is the set of measures to protect the health, well-being and human rights of individuals, especially in conditions of vulnerability, to live free from abuse, harm and neglect. This is HIVOS's commitment towards its own team members, and towards any of the people who are directly or indirectly associated with the organization. Safeguarding can be considered the operationalization of the "do no harm" principle.
Sexual Harassment	Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when: - Submission to such conduct is made either explicitly or implicitly a term or

	<p>condition of an individual's employment or fulfilment of a right (access to health, education, etc), or</p> <ul style="list-style-type: none"> - Submission to or rejection of such conduct by an individual is used as a basis for decisions affecting such individual, or - Such conduct has the purpose or effect of unreasonably interfering with an individual's life or creating an intimidating, hostile, or offensive environment around them.
Social inclusion	<p>Is understood as a process by which efforts are made to ensure equal opportunities for all, regardless of their gender, age, ability or disability, ethnicity, religion, caste, sexual orientation and gender expression, poverty level or other factors, so that they can achieve their full potential in life. It is a multi-dimensional process aimed at creating conditions which enable full and active participation of every member of the society in all aspects of life, including civic, social, economic, and political activities, as well as participation in decision-making processes.</p>
Stigma	<p>Can be understood as a process of dehumanizing, degrading, discrediting and devaluing people in certain population groups; it is often based on a feeling of disgust. Stigma attaches itself to an attribute, quality or identity that is regarded as 'inferior' or 'abnormal'. Stigma is based on a socially constructed 'us' and 'them', which serve to confirm the 'normality' of the majority through the devaluation of the 'other'. Stigma often lies at the root of discrimination; it is a rationale for discrimination. It provides a 'justification', so that discrimination comes to be seen as natural, necessary and desirable. Stigma plays an insidious role in making systemic discrimination possible.</p>
Survivor-Centered Approach	<p>A survivor-centered approach is an approach to testimony collection, fact finding process and investigation that puts the survivor at the center, thus giving them the opportunity to choose who (not) to report to, on their own terms, ensuring full confidentiality of the report and giving them the opportunity to choose how to proceed once the facts are verified.</p> <p>A survivor-centered approach is based on empowering the survivor by prioritizing their rights, needs, and wishes. This includes ensuring that survivors have access to appropriate, accessible, and quality support services.</p> <p>In a nutshell a survivor-centered approach is based on 4 principles:</p> <ul style="list-style-type: none"> - Confidentiality - Safety - Respect - Non-discrimination
VAW	<p>All forms of violence against women, which include but are not limited to: rape, denial of essential services, female genital mutilations, forced abortions and forced sterilization. It's a subset of GBV, but the two terms are not interchangeable.</p>

Violence	<p>It's the expression, in different forms that can be concurrent or separate, to cause harm to a person or a group of people.</p> <p>It can be classified as:</p> <ul style="list-style-type: none"> - Neglect (specifically related to children and non-autonomous adults): It's the ongoing failure to meet a child's basic needs, and it's the most common form of child abuse. Aside for the immediate repercussions, neglect can have much more long lasting repercussions, as it exposes children and non-autonomous adults to danger from those who wish to exploit them, thus leaving serious effects on mental health and wellbeing on the victims/survivors. - Emotional and psychological violence: Any behavior aimed at diminishing the person receiving it (e.g. criticize, shame, and humiliate) in order to gain control and power in a relationship. It often also involves controlling behavior, extreme jealousy, gaslighting, and the abuser usually tends to isolate their victim from friends and family, to prevent the person from getting a reality check or broader perspective. - Physical violence: It's any form of coercive physical contact with the intent to hurt the other person. It can be associated with SEAH or expressed alone, in the context of escalation of conflict, retaliation or as a deliberate decision to cause harm. - Sexual violence: Any forceful sexual act, irrespective of the type of act, duration, the gender or sexual orientation of the parties involved, etc. It's also defined as any sexual intercourse for which consent was either not obtained or it was obtained under threat, whether explicit or implicit.
Vulnerability	<p>Refers to individuals or groups statistically at higher risk of physical or mental harm, abuse, rape or neglect, because of their social or economic status. When talking about vulnerability it is paramount to define the responsibility and accountability of the parties involved in creating challenging conditions for some individuals, thus favoring their socio-economic vulnerability.</p>
Whistle-Blower	<p>A whistle-blower is someone who reports systemic wrongdoing in the form of misuse of resources, fraud, abuse, corruption, or dangers to public health and safety to someone who is in the position to rectify the wrongdoing. A whistle-blower typically works inside of the organization where the wrongdoing is taking place; however, being an agency or company "insider" is not essential to serving as a whistle-blower.</p>

ANNEX III

PARTNER SAFEGUARDING RISK ASSESSMENT CHECKLIST

Area	Questions	Yes/No/response	Action
Partner background	Is the partner legally registered?		
	Has the partner been involved in any prior safeguarding incidents?		Conduct background checks
	Are there references of other organizations the partner has worked with?		Obtain references
	Were there ever complaints about safeguarding issues concerning the partner?		Review any public complaints or negative press about the partner's activities, especially related to safeguarding
Policy and procedures	Does the partner have a comprehensive safeguarding policy in place?		Obtain a copy for review
	How often is their safeguarding policy reviewed and updated?		
	Does the partner have a designated safeguarding officer or lead?		Request contact details
	Is there a whistleblowing policy for reporting concerns?		Obtain a copy for review
Training	Are all staff members adequately trained in safeguarding policies and practices?		Check what areas of safeguarding are covered
	How often is safeguarding training conducted for new and existing staff?		
Recruitment	Is the partner registered with the Misconduct Disclosure Scheme (or plans to be)?		

Safeguarding practices	Are there clear procedures for reporting safeguarding incidents? How quickly are incidents reported?		
	Does the partner collect data on safeguarding incidents? How is it analyzed and used for improvement?		If yes, is it anonymized before sharing?
	Are there clear consequences or disciplinary actions for staff members involved in safeguarding breaches?		If so, what are they? Are they known to all staff?
	What support mechanisms are in place for individuals impacted by safeguarding issues?		
	Is the partner able to perform an investigation following basic international standards?		If yes, what are the steps on the partner's investigation system?
	Is there a dedicated person working on safeguarding?		If not, who deals with it and how?

ANNEX IV

PROJECT SAFEGUARDING RISK ASSESSMENT CHECKLIST

Area	Questions	Yes/No/response	Action
Project overview	What is the scope of the project?		
	Does it involve any direct interaction with groups who are statistically more at risk of violence (children, elderly people, key populations, etc.)?		
	Who are the key stakeholders (partners, employees, volunteers, project participants)?		
	Are there any high-risk areas (e.g., conflict zones, impoverished areas)?		
Safeguarding risks	Has the project identified specific measures to mitigate safeguarding risks?		
	Does the project target populations who are socially marginalized?		
			If yes, who are they (incarcerated people, sex workers, people from the LGBTQI+ community, people living with HIV, children, elderly people, people with disabilities, refugees, etc.)?
	What are the potential risks of abuse by HIVOS staff or partners (sexual, physical, emotional, financial) to the groups involved?		

Project activities	Are activities involving project participants always supervised by trained personnel?		
	Are project sites secure, with controlled access to ensure the safety of all individuals, especially those who are most at risk?		
	If transportation or accommodation is provided, are they safe and appropriate for the participants?		
	If working with children, do the project activities follow child protection laws, including parental consent, age-appropriate engagement, and supervision?		
Community involvement	Has informed consent been obtained from participants, especially from parents or guardians of children?		
	Are participants aware of their rights?		Explain how they have been made aware of them.
	Have community members been involved in risk assessment and the design of safeguarding measures?		
	Can there be collaboration with local safeguarding networks or authorities for additional support or intervention if needed?		If yes, list other organizations HIVOS can partner with
M&E	Are safeguarding practices regularly monitored during the project's implementation?		
	Are safeguarding incidents being recorded and analyzed?		If yes, how is this data used to improve safeguarding measures?
	Are there internal or external audits conducted to evaluate the effectiveness of safeguarding procedures?		If yes, can the reports be shared?

Recruitment and compliance	Is Hivos familiar with and compliant with local and international safeguarding laws relevant to the project location?		
	Are background checks conducted on all staff, volunteers, and third-party contractors who will work on the project?		For Hivos staff: Misconduct Disclosure Scheme – Suggestion for enhanced due diligence: ensure all partners are also signatories of the MDS and are compliant with it.
	Are all team members trained in safeguarding policies?		If yes, how is this training carried out? Is it mandatory?
	Are there designated safeguarding officers within the project team?		If yes, is it a voluntary role? Are their roles and responsibilities clearly defined?
Budget	Are sufficient resources (financial, human, material) allocated for safeguarding efforts within the project?		Do these resources include a contingency budget for emergencies (e.g., immediate support or relocation of survivors)

Safeguarding practices	Are there clear procedures for reporting safeguarding incidents? How quickly are incidents reported?		
	Does the partner collect data on safeguarding incidents? How is it analyzed and used for improvement?		If yes, is it anonymized before sharing?
	Are there clear consequences or disciplinary actions for staff members involved in safeguarding breaches?		If so, what are they? Are they known to all staff?
	What support mechanisms are in place for individuals impacted by safeguarding issues?		
	Is the partner able to perform an investigation following basic international standards?		If yes, what are the steps on the partner's investigation system?
	Is there a dedicated person working on safeguarding?		If not, who deals with it and how?