



Safeguarding Policy

Date of Policy Statement: January 2023

1. Purpose of Policy

The purpose of this policy is to protect people, particularly children and at-risk adults, from any harm that may be caused due to their contact with Humentum. This includes harm arising from:

- The conduct of employees, board members, associates and other personnel that maybe acting on behalf of Humentum
- The design and implementation of Humentum services and activities

The policy outlines the commitments made by Humentum and informs staff and associated personnel of their responsibilities in relation to safeguarding.

This policy does not cover:

- Sexual harassment in the workplace, which is addressed by Humentum's Anti Bullying, Discrimination, and Harassment Policy
- Safeguarding concerns in the wider community not perpetrated by Humentum and associated personnel

2. Policy Scope

The policy applies to:

- All Humentum employees (salaried, hourly, or contracted employees)
- Associated personnel engaged with work or visits related to Humentum, including but not limited to the following: consultants; volunteers; contractors; trainees; and program visitors.

3. Policy Statement

- Humentum believes that everyone we encounter, regardless of race, religion, age, gender identity, disability, sexual orientation or ethnic origin has the right to be protected from all forms of harm, abuse, neglect and exploitation. Humentum will not tolerate abuse and exploitation by employees or associated personnel.
- Humentum commits to addressing safeguarding throughout its work, through the three pillars of: **prevention, reporting, and response.**

4. Definitions

Safeguarding is the protection of people, including children and at-risk adults, from harm that arises in encountering employees and associated personnel. At Humentum, safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse, and harassment from occurring; to protect people, especially children and at-risk adults, from that harm; and to respond appropriately when harm does occur. Safeguarding emphasizes preventing and responding to harm from any potential, actual or attempted abuse of power, trust, or vulnerability, especially for sexual purposes.

Safeguarding applies across all Humentum services, to all employees, and associated personnel. It requires that all Humentum employees and associated personnel proactively identify, prevent and guard against risks of harm, exploitation, and abuse. It requires that Humentum has in place accountable and transparent systems for response, reporting and learning when risks materialize.

5. Humentum responsibilities

Humentum will:

- Ensure all employees and associated personnel have access to, are familiar with, and know their responsibilities within this policy
- Design and implement all its activities in a manner that protects people from risk of harm that may arise from their contact with Humentum. This includes the way in which information about individuals is gathered and communicated
- Implement stringent safeguarding procedures when recruiting, managing, and deploying employees and associated personnel, including reference checks. Where possible and permissible by local law, applicants may be requested to give written permission for a criminal record or police background check.
- Ensure all personnel receive training on safeguarding at a level commensurate with their role in the organization
- Investigate reports of safeguarding concerns promptly and according to due process and take appropriate action
- Work with its proposed affiliates and partner organizations, to carry out a safeguarding risk analysis which specifically includes any safeguarding issues and propose actions to mitigate these risks, prior to carrying out any activities with that affiliate or partner. Such risk analysis will be an integral part of Humentum's project proposals, program planning guidelines and partnership assessment tools.

6. Staff and associate personnel responsibilities

6.1. Child safeguarding

Humentum employees and associated personnel must not:

- Engage in sexual activity with anyone under the age of eighteen
- Sexually abuse or exploit children
- Subject a child to physical, emotional or psychological abuse, or neglect
- Engage in any commercially exploitative activities with children including child labor or trafficking

6.2. Adult safeguarding

Humentum employees and associated personnel must not:

- Sexually abuse or exploit adults
- Subject an adult to physical, emotional, or psychological abuse, or neglect
- Engage in any commercially exploitative activities with adults including trafficking in persons

6.3. Protection from sexual exploitation and abuse

Humentum employees and associated personnel must not:

- Exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is directly due to the services of Humentum
- Engage in any sexual relationships with those who are benefitting directly from assistance from Humentum members or clients that Humentum is working with, since they are based on inherently unequal power dynamics

Additionally, Humentum employees and associated personnel are required to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy
- Report any concerns or suspicions regarding safeguarding violations by Humentum employees or associated personnel to the appropriate Humentum point of contact, who will initiate the response procedures detailed in this policy.

7. Reporting

Humentum will ensure that safe, appropriate, accessible mechanisms for reporting safeguarding concerns are made available to employees, associated personnel, and recipients of our services.

Any employees or associated personnel reporting concerns or complaints to Humentum will be protected by the Humentum Whistleblowing Policy and its Anti-Retaliation Policy as in Humentum's Code of Conduct. Humentum will also accept complaints from external sources such as members of the public, partners and official bodies.

7.1. How to report a safeguarding concern

Employees and associated personnel who have a complaint or concern relating to safeguarding must report it immediately to their line manager or point of contact.

This can be done in a number of ways as outlined in the reporting procedure below. If the individual does not feel comfortable reporting to their line manager or point of contact (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they must report it to the Head, People & Culture, the CEO or another member of the Executive Team (ET) or the external reporting hotline: humentum.ethicspoint.com. If personnel feel that the matter should be escalated beyond ET, then the concern should be reported to the focal point of the Talent Committee on the Board.

8. Response

Humentum will investigate safeguarding reports and concerns according to Humentum policy and procedure, as well as any and all applicable legal and statutory obligations.

Humentum will take appropriate disciplinary measures with employees or associated personnel found in breach of policy. If/as applicable, Humentum will also report safeguarding complaints or concerns, to law enforcement or regulatory bodies as required under law, after investigation.

Humentum will approach all aspects of safeguarding with a survivor-centric focus.

9. Confidentiality

Humentum will ensure that confidentiality is maintained at all stages of the process when responding to safeguarding complaints or concerns. Information relating to the complaint or concern and subsequent case management will be shared on a need-to-know basis only and will always be kept secure.

For any employee that is dismissed due to a breach of the safeguarding policy, Humentum will disclose the breach as the reason for dismissal to a future employer when a request for information is made.

10. Glossary of Terms

Protection from Sexual Exploitation and Abuse (PSEA)

The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by staff or associated personnel. The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13)

Sexual abuse

The term 'sexual abuse' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual exploitation

The term 'sexual exploitation' means 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. This definition includes human trafficking and slavery.

Humentum Safeguarding

Safeguarding Reporting & Response Procedures

Purpose and scope

The purpose of this document is to provide procedures for dealing with reports of breach of the Humentum Safeguarding Policy, where the alleged safeguarding violation is:

- Against employees, associated personnel, or members of the public associated with Humentum's activities, and/or
- Perpetrated by Humentum employees or associated personnel

Procedures

1. Reporting

- 1.1. Reports may reach Humentum through various routes. This report may be in a structured written format such as a letter, e-mail or SMS. It may also be in the form of a verbal disclosure. Another option is through Humentum's Whistleblowing Procedures. Additionally, if Humentum employees or associated personnel hear something in an informal discussion or chat that they think is a safeguarding concern, they should report this to their line manager if applicable, the Head, People & Culture, the CEO, or a member of the Executive Team (ET) or the external reporting hotline. : humentum.ethicspoint.com
- 1.2. If a safeguarding concern is disclosed directly to a Humentum employee or associated personnel, the person receiving the report must bear the following in mind:
 - Listen
 - Empathize with the person
 - Ask who, when, where, what *but not why*
 - Repeat/check your understanding of the situation *but offer no judgements or opinions*
 - Report to the appropriate employee member (see below)
- 1.3. The person receiving the report must document the following information to the extent possible/divulged:
 - Name of person making report
 - Name(s) of alleged survivor(s) of safeguarding incident(s) if different from above
 - Name(s) of alleged perpetrator(s)
 - Description of incident(s)
 - Dates(s), times(s) and location(s) of incident
- 1.4. The person receiving the report should then forward this information to their direct line manager or the Senior Manager, People & Culture, or the CEO, or another member of the ET **within 24 hours**.
- 1.5. Due to the sensitive nature of safeguarding concerns, confidentiality must be

maintained during all stages of the reporting process, and information shared on a limited 'need to know' basis only.

- 1.6. If the reporting employee or associated personnel is not satisfied that Humentum is addressing the report, they have a right to escalate the report, either up the management line or directly to the focal point on Humentum's Talent Committee. All reporters will be protected against retaliation as a result of the report, as per Humentum's Whistleblowing Policy and the Anti-Retaliation Policy in Humentum's Code of Conduct.

2. Assess how to proceed with the reporting

- 2.1. The ET will appoint a decision-maker to respond to the report.
- 2.2. The decision-maker will determine whether the report is credible, by considering the facts reported and in consultation with expert opinion as necessary, consider if the reported incident(s) represents a breach of safeguarding policy.
- 2.3. If the reported incident does not represent a breach of Humentum's Safeguarding Policy as not related to our employees or associated personnel but represents a safeguarding risk to others (such as a child safeguarding incident), the ET will refer the matter through the appropriate channels (e.g., local authorities), that are reliant to take further action.
- 2.4. If there is insufficient information to investigate the report, and no way to ascertain this information, the report should be filed in case it can be of use in the future.
- 2.5. If the report raises any concerns relating to children under the age of 18, Humentum must seek expert advice immediately. If at any point in the process of responding to the report it becomes apparent that anyone involved is a child under the age of 18, the assigned decision-maker should seek expert advice before proceeding.
- 2.6. *If the complaint is credible, then it must be investigated.* To do so, the decision-maker will assess if Humentum has the relevant expertise and capacity to manage this safeguarding case. If not, they will seek immediate assistance, through external capacity, as necessary.
- 2.7. *Clarify what, how, and with whom information will be shared relating to this case.* Confidentiality should always be maintained, and information shared on a need-to-know basis only. Decide which information needs to be shared with which stakeholder as information needs may be different.
- 2.8. Determine Humentum's obligation to inform relevant bodies of a safeguarding incident, including donor agencies, statutory bodies, and law enforcement. Some of these may require Humentum to inform upon receipt of a credible report, others may require information on completion of the case, or annual top-line information on cases. When submitting information to any of these bodies, Humentum will consider the confidentiality implications very carefully.

3. Appoint roles and responsibilities for case management

- 3.1. Appoint a decision-maker for the case. The decision-maker should be a member of the ET who is not implicated or involved in the case in any way. If/as necessary, the focal point of the Talent Committee may serve as the decision-maker. The decision-maker is responsible for overseeing the investigation into the allegations and to work with Humentum leadership to make any disciplinary or other determinations.

4. Provide support to survivor where needed/requested

- 4.1. As an expression of its duty of care, Humentum will seek to provide appropriate support to survivor(s) of safeguarding incidents. Such support will be survivor-centered and determined on a case-by-case basis.

5. Assess any protection or security risks to stakeholders

- 5.1. For reports relating to serious incidents: Humentum will undertake an immediate risk assessment to determine whether there are any current or potential risks to any stakeholders involved in the case and develop a mitigation plan if required.
- 5.2. Humentum will continue to update the risk assessment and plan on a regular basis throughout and after the case as required.

6. Decide next steps

The decision-maker will determine the credibility of the report (if it includes an alleged perpetrator(s) and a survivor and would constitute a violation of Humentum's Safeguarding Policy). The decision-maker will consult expert opinion as necessary.

Once determined credible, the decision-maker will oversee an investigation for breach of policy. This will include forming an investigative team comprised of the decision-maker, at least one other ET member and guidance from an expert for evidence gathering, interviews, and drafting a report of findings. The investigation may be completed entirely by the expert where deemed appropriate. The decision-maker, in concert with Humentum leadership and in adherence with Humentum's Safeguarding, Harassment, and Whistleblowing policies, will undertake a fair, impartial, and swift investigation.

7. Make decision on outcome of investigation report

- 7.1. The decision-maker, in concert with Humentum leadership and in adherence with Humentum's Safeguarding, Harassment, and Whistleblowing Policies, will determine next steps following an investigation, including – but not limited to - disciplinary action and/or referral to relevant authorities.

- 7.2. If the report concerns associated personnel (for example contractors, consultants or suppliers), the decision-making process will be different, as they are not direct Humentum employees. Although associated personnel are not employees, Humentum has a duty of care to protect from harm anyone who contacts any aspect of Humentum personnel or services. Although Humentum cannot take disciplinary action against non-employees, decisions will be made to terminate a contract with a supplier or independent consultant and/or report that individual to the authorities or relevant bodies.
- 7.3. If at this or any stage in the process criminal activity is suspected, the case will be referred to the relevant authorities unless this may pose a risk to anyone involved in the case. In this case, the decision-maker, together with Leadership, will need to decide how to proceed. This decision should be made bearing in mind a risk assessment of potential protection risks to all concerned, including the survivor.
- 7.4. The Board of Directors will always be consulted on any reporting to the authorities, including the who, when, how and (to the extent appropriate) the content of the reporting.
- 7.5. If the decision is in relation to an employee then the following outcomes are applied, on investigation:
 - 7.5.1. No wrongdoing found, the report is documented but no action towards the employee, if the reporting was deemed malicious then Disciplinary Procedures will be applied to the reporter.
 - 7.5.2. There was not a breach of policy, but the survivor felt sufficiently compromised, then the employee will receive a verbal warning and the incident documented on the record.
 - 7.5.3. If there was a breach of policy, this is regarded as gross misconduct and the employee's employment will be terminated.

8. Concluding the case

- 8.1. Document all actions undertaken, and decisions made resulting from the case clearly and confidentially.
- 8.2. Store all information relating to the case confidentially, and in accordance with Humentum data protection policy and any applicable data protection laws, including the General Data Protection Regulation (GDPR).
- 8.3. Record anonymized data relating to the case required for organizational reporting requirements (for instance, incident reporting to the Board, risk assessments, safeguarding reporting to donors), and for organizational learning for dealing with future cases.
- 8.4. Conduct an after-action report, determining what worked in the process and what can be improved upon.