



POLICY and PROCEDURE

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APPROVALS			
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## PURPOSE

CORE enforces a **ZERO TOLERANCE** position for safeguarding violations. It is the policy and practice of CORE to safeguard the individuals we serve and with whom CORE works, by following the “Do No Harm” principle, including children and adults who may be particularly vulnerable. This includes safeguarding from the following conduct by our staff and/or partners: *sexual exploitation and abuse (SEA)*; *exploitation, neglect, or abuse of children, adults at risk, or LGBTI* (Lesbian, Gay, Bisexual, Transgender, Intersex) *individuals*; and any form of trafficking in individuals and persons.

CORE safeguards populations by creating awareness to staff of what safeguarding violations are, by prohibiting safeguarding violations, and by enforcing mechanisms to address complaints about suspected safeguarding concerns. CORE recognizes that all beneficiaries of our programs have the right to be protected from safeguarding violations and strives to incorporate protection measures within our programming.

Staff or partners who attempt or engage in violations of this policy will be disciplined, up to and including termination of employment and/or dissolving any contractual relationship with CORE and/or criminal reporting with law enforcement.

## SCOPE

This policy applies to every CORE staff member and partner in all locations including on and off duty and to all country offices, project sites, locations and during emergency responses.

## DEFINITIONS

- A. Child:** A child is any individual under the age of 18, irrespective of local country definitions of when a child reaches adulthood.<sup>1</sup>
- B. Child Marriage:** The custom of marrying young children, particularly girls, is a form of sexual violence as children are unable to give or withhold consent.
- C. Child Sexual Abuse:** Child sexual abuse is the involvement of a child in sexual activity that s/he does not fully comprehend, give informed consent to, or for which s/he is not developmentally prepared and cannot give consent, or that violates the laws or social taboos of society. It is evidenced by an activity between a child and an adult or another child who by age or development is in a relationship of responsibility, trust or power, the activity being intended to gratify or satisfy the needs of the other person. It may include, but is not limited to, the inducement or coercion of a child to engage in any unlawful sexual activity, the exploitative use of a child in prostitution or other lawful sexual practices or the exploitative use of pornographic performances and materials.<sup>2</sup>
- D. Human trafficking:** The recruitment, transport, transfer, harbouring or receipt of a person by

<sup>1</sup> Definition of child from the Inter Agency Standing Committee (IASC) Guidelines to implement Minimum Operating Standards for Protection from Sexual Exploitation and Abuse by UN and non-UN Personnel, March 2013.

<sup>2</sup> United Nations Secretary General's Bulletin: Special measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13).

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such means as threat or use of force or other forms of coercion, abduction, fraud or deception for the purpose of exploitation.<sup>3</sup>

- E. Partner:** Sub-recipients to CORE, partner organizations, contractors, consultants, and any other individual or entity that acts on CORE's behalf or at CORE's direction.
- F. Sexual abuse:** The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- G. 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.
- H. Staff:** CORE employee, volunteer, intern, board officer.
- I. Vulnerable adults** are defined as:
  - Those aged over 18 years and who identify themselves as unable to take care of themselves/ protect themselves from harm or exploitation; or
  - Who, due to their gender, mental or physical health, disability, ethnicity, religious identity, sexual orientation, economic or social status, or as a result of disasters and conflicts, are deemed to be at risk.

**POLICY****Protection from Sexual Exploitation and Abuse (PSEA) Policy**

CORE adheres to the six core principles adopted by the Inter-Agency Standing Committee (IASC) Task Force relating to sexual exploitation and abuse (SEA)<sup>4</sup>.

1. "Sexual exploitation and abuse by humanitarian workers constitute acts of gross misconduct and are therefore grounds for termination of employment.
2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defence.
3. Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited. This includes exchange of assistance that is due to beneficiaries.
4. Sexual relationships between humanitarian workers and beneficiaries are strongly discouraged since they are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of humanitarian aid work.
5. Where a humanitarian worker develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, he or she must report such

<sup>3</sup> UN Trafficking in Persons Protocol, which supplements the United Nations Convention against Transnational Organized Crime.

<sup>4</sup> See Report of the Inter-Agency Standing Committee Task Force on Protection from Sexual Exploitation and Abuse in Humanitarian Crises of 13 June 2002, Plan of Action, Section I.A.

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concerns via established agency reporting mechanisms.

6. Humanitarian workers are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of their code of conduct. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.”

### **Child Safeguarding Policy**

Child safeguarding reaches beyond child protection to prevent harm to children’s health and development and ensures children are developing in circumstances consistent with providing safe and effective care. In keeping with the concept of child safeguarding, all efforts are made to ensure that children are safe within their families and communities. This may include interventions aimed at the prevention of abuse, exploitation, neglect, child labor, and other forms of violence against children; as well as protection of children who are in these situations and implementation of appropriate measures and resources to support the needs of children who have survived them.

CORE will not fund any individual or organization that does not meet CORE’s child safeguarding standards. CORE will make all parties under the authority of this policy aware of the relevant standards and procedures. CORE’s recruitment processes include screening measures to ensure that those who pose an unacceptable risk to children are not employed by the organization.

Any staff, associates, or partners who engage in child marriage (marriage to anyone under the age of 18) will be in violation of the PSEA policy. As per the definition of child marriage, anyone under the age of 18 is not able to give or withhold consent and is considered a form of sexual violence. Any staff married to a child under the age of 18 as per the custom or law of their country, before the CORE’s PSEA policy came into force will not be subject to disciplinary action. CORE, however, prohibits any such relationship from occurring once the PSEA policy came into effect.

CORE is committed to the principles of the UN Convention on the Rights of the Child (CRC), which include the following:

### **Guiding Principles of the UN Convention on the Rights of the Child**

#### **CRC Principle 1: Survival and Development**

As well as children’s right to life, humanitarian workers must also consider the effects of the emergency and response on the physical, psychological, emotional, social, and spiritual development of children.

#### **CRC Principle 2: Non-discrimination**

Emergencies often magnify existing differences and further marginalize those already at risk of discrimination. Humanitarian workers must identify and monitor existing and new patterns of discrimination and power, and address them in their response.

#### **CRC Principle 3: Child Participation**

Humanitarian workers must ensure that girls and boys are given space and time to meaningfully participate in decisions that affect them during all stages of an emergency. Children should be supported to express their views in safety and these views should be taken seriously.

#### **CRC Principle 4: Best Interests of the Child**

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In all actions concerning children, the best interests of the child shall be a primary consideration. This principle should guide all stages of the program cycle.

**CORE Policy Against Sexual Exploitation and Abuse (SEA)**

- Sexual exploitation and sexual abuse of beneficiaries and vulnerable populations by CORE staff members constitute acts of gross misconduct and will result in disciplinary action, up to and including immediate termination of employment.
- Sexual activity with a child (defined here as a person under age 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief in the age of a person is not a defense. See Child Safeguarding Section
- Relationships with program beneficiaries are often based on unequal power dynamics and may undermine the credibility and integrity of humanitarian work. For this reason, such relationships, including romantic and sexual relationships, between staff and beneficiaries are prohibited. However, CORE recognizes that some staff are members of the communities in which they work and therefore could develop relationships in their communities that are not inappropriate. In those circumstances, CORE requires that those staff members disclose any such relationship to their supervisor and Human Resources when it begins so CORE can assess the risk of exploitation and abuse and take appropriate action if needed.
- Exchange of money, employment, goods, services, or anything of value for a sex act, including sexual favors or other forms of humiliating, degrading or exploitative behavior, is prohibited. This includes the exchange of money, employment, goods, services, or anything of value for a sex act, including sexual favors or other forms of humiliating, degrading or exploitative behavior, as a condition for selection as a beneficiary or assistance as a beneficiary. This also includes sex with a sex worker for the exchange of money, employment, goods, services, or anything of value. See Trafficking in Persons Prevention section of this policy.
- When a CORE staff member has concerns or suspicions of sexual exploitation or sexual abuse committed by a fellow worker, whether or not the person is affiliated with CORE, he or she is required to report such concerns in accordance with the procedures outlined within this policy.
- CORE staff members are obliged to create and maintain an environment that prevents sexual exploitation and abuse and promotes implementation of CORE's Protection from Sexual Exploitation and Abuse Policy. Managers at all levels have a responsibility to model appropriate behavior, and support and develop systems that maintain this environment.

**Safeguarding Adults at Risk Policy**

CORE is committed to safeguarding adults at risk from abuse or neglect and enabling and empowering adults to make informed choices. "Adults at risk" means anyone over the age of 18 who has needs for care and support and is experiencing, or is at risk of, abuse and neglect, and as a result of those care and support needs is unable to protect themselves from either the risk of, or

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the experience of abuse or neglect. An adult at risk may: have an illness affecting their mental or physical health; have a learning disability; suffer from drug or alcohol problems; or be frail.

Individuals and groups within a population have different capacities, needs, and vulnerabilities, which change over time. Individual factors such as age, sex, disability, and legal or health status can limit access to assistance. The interplay of factors in a given context can strengthen capacities, build resilience, or undermine access to assistance for any individual or group. In many contexts, entire communities and groups may also be vulnerable because they live in remote, insecure, or inaccessible areas, or because they are geographically dispersed with limited access to assistance and protection. Groups may be under-served and discriminated against because of nationality, ethnicity, race, language, gender identity, or religious or political affiliation. This is not an exhaustive list but includes those most frequently identified.

Abuse of adults at risk may take many forms, which could include:

- Physical abuse
- Sexual abuse
- Psychological abuse
- Financial/material abuse
- Discrimination
- Neglect

### **Trafficking in Persons (TIP) Prevention Policy**

CORE strongly opposes trafficking in persons and forced labor in any form and prohibits staff and partners from engaging in behaviors that facilitate or support trafficking in persons. Trafficking in persons is the trade in people and does not necessarily involve the movement of persons from one place to another.

All CORE staff, subcontractors, sub-recipients, consultants, and agents must comply with the requirements of Executive Order 13627, “Strengthening Protections Against Trafficking in Persons in Federal Contracts” codified in U.S. Government regulations and agency specific provisions (collectively, “Trafficking Provisions”). To the extent the U.S. Government regulations, U.S. Government agency provisions or the Executive Order and this policy differ in their requirements, the stricter requirements, as determined by the Compliance Officer, must be followed. All staff must report any instance of trafficking in persons or suspected trafficking in persons.

Trafficking in persons and forced labor are violations of law, including in the U.S. and U.K., and internationally recognized human rights, and are incompatible with CORE’s core values. This policy complies with the requirements of Executive Order 13627 issued on 9/25/2012; FAR 52.222-50, Combating Trafficking in Persons (MAR 2015); and USAID Standard Provision, Trafficking in Persons (APRIL 2016); and the pronouncements or requirements of other U.S. Government agencies, including Department of State, each addressing the crime of human trafficking by setting forth the Federal Government’s zero tolerance policy regarding trafficking in persons.

In addition, this policy is made pursuant to section 54(1) of the Modern Slavery Act 2015 (UK) and constitutes CORE’ Modern Slavery Statement.

Pursuant to the Trafficking Provisions, CORE staff and partners are prohibited from:

- Engaging in trafficking in persons (i.e., using force, fraud, or coercion).

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- Procuring commercial sex acts, regardless of whether the act is legal or illegal in the jurisdiction where it is procured and regardless of whether the conduct occurs during or outside working hours. (A “commercial sex act” is any sex act on account of which anything of value is given to or received by any person. This includes both commercial items or such issues as, for example, a job or promises of similar.).
- Using forced labor.
- Destroying, concealing, confiscating, or otherwise denying access by a staff member to the staff member’s identity or immigration documents.
- Failing to pay return transportation costs for certain staff who have finished employment or work outside that staff member’s nation of residence (except as exempt by law or regulation).
- Soliciting a person for the purpose of employment, or offering employment, by means of materially false or fraudulent pretenses, representations, or promises regarding that employment.
- Charging recruitment fees to staff.
- Providing or arranging housing that fails to meet the host country housing and safety standards.
- If required, failing to provide an employment contract, recruitment agreement, or similar work document in writing in the employee’s native language and prior to the staff member departing from her or his country of origin.

## Reporting

All staff, supervisors and partners are required to immediately report any instance of a violation of this policy or a suspected violation of this policy in accordance with CORE’s policies and procedures through one of the following mechanisms:

- Your direct manager/supervisor or another member of management you are comfortable speaking with.
- CORE’s PSEA in-country focal points
- EthicsPoint at
  - [Coreresponse.ethicspoint.com](mailto:Coreresponse.ethicspoint.com).
  - [Coreresponsemobile.ethicspoint.com](mailto:Coreresponsemobile.ethicspoint.com).
- Safeguarding Team at [Safeguarding.focalpoints@coreresponse.org](mailto:Safeguarding.focalpoints@coreresponse.org).
- A member of CORE’s senior management team.

In cases of human trafficking, staff may also file a report with the Global Human Trafficking Hotline at 1-844-888-FREE and its e-mail address at [help@befree.org](mailto:help@befree.org). Staff and partners are encouraged to include their names on the reports because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. If an individual reports anonymously through EthicsPoint, they are encouraged to review their complaint online regularly as an investigator may ask questions through the EthicsPoint portal.

Staff should not conduct their own investigation unless they have the appropriate designated authority granted by CORE.

All information received will be reviewed so that an appropriate investigation may, if warranted, be conducted. All staff and partners are obligated to cooperate fully in the investigation process. Failure to cooperate will result in disciplinary action, up to and including termination of employment

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or contractual relationship with CORE.

**Confidentiality of Complaint**

CORE will protect the confidentiality of sexual exploitation and abuse allegations to the greatest extent possible in order to protect the integrity of the investigation and prevent embarrassment, further discrimination or harassment, or retaliation. Confidential or sensitive information obtained by any staff member during the course of an investigation shall not be disclosed to others unless required by law. Concerns of individuals regarding confidentiality of information provided by them will be handled as sensitively as possible, and information shall not unnecessarily be disclosed to others.

CORE cannot guarantee, however, complete confidentiality, because the organization cannot conduct an effective investigation without revealing certain information to the alleged perpetrator and potential witnesses. CORE will share information about allegations of sexual exploitation, abuse and harassment only with those who need to know about it. Records relating to sexual exploitation, abuse and harassment complaints will also be kept confidential on the same basis.

**Support for Survivors**

Support will be offered to survivors regardless of the outcome of any investigations. This support can include specialist psychosocial counselling and/or access to other specialist support as needed.

**Safeguards**

CORE strictly prohibits retaliation against staff and partners who report (suspected and actual) misconduct in good faith. Retaliation against an individual or reporting violations in accordance with this policy or participating in investigations of such is a violation of this policy and will be subject to disciplinary action up to and including termination of employment or contractual relationship with CORE. No adverse employment action, such as termination or counseling, will be taken against any staff in retaliation for reporting allegations that the staff reasonably believes to be true. Individuals making allegations with reckless disregard for their truth or falsity may be subject to disciplinary action up to and including termination of employment or contractual relationship with CORE.

**Responsibilities**

All CORE staff are responsible for reading, understanding, and complying with this policy as well as completing any associated training. Managers at all levels have a particular responsibility to model appropriate behavior and support and develop systems that create and maintain an environment that prevents safeguarding violations. Managers and supervisors who knowingly allow or tolerate safeguarding violations are in violation of this policy and are subject to disciplinary action up to and including termination. All supervisors must make themselves available to hear their staff members' concerns and respond appropriately. Supervisors are responsible to make sure that there is no retaliation against staff members who report misconduct.



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**YEARLY CHANGES AND REVIEWS**

This policy is subject to annual reviews or as needed to ensure it remains current and effective. Any updates or revisions made throughout the year will be documented in this section.

<b>Year</b>	<b>Changes Made:</b>	<b>Reviewed By:</b>	<b>Date Reviewed:</b>
2025	Updated policy.	Sheri Randazzo, Jerome Lebleu	January 2025