

SAFEGUARDING CORE STANDARDS POLICY

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Responsible Team Ethics & Compliance Department

Supersedes None

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POLICY

1. Purpose

Human trafficking, child abuse, sexual exploitation, abuse and harassment are forms of gender-based violence (GBV). These abuses are human rights violations. The individuals with whom we work have a fundamental right to receive assistance and interact with Mercy Corps activities without being subject to these forms of violence. Likewise, our team members and partners have the right to work in an environment free from sexual misconduct.

Due to the reliance on aid during humanitarian responses and significant influx of resources for development projects, power imbalances are inherent to the presence of NGOs in communities. These power imbalances may be misused, leading to violations of people's fundamental rights. Our commitment to accountability requires us to ensure we always use power responsibly. Any abuse, harassment, trafficking or exploitation of children or adults by our team members, partners, contractors, or other representatives is an abuse of power, directly contradicts the humanitarian principles upon which our work is based, can put our programs and reputation at risk, and can inflict serious and lasting harm on those experiencing it.

A key part of Mercy Corps' Safe, Diverse and Inclusive Commitment, one of the core commitments of our 10-year strategy, Pathway to Possibility, is ensuring a culture of physical and psychological safety within our teams and our programs. Safeguarding is fundamental to that Commitment. We define safeguarding as ***our responsibility to ensure that no one working on our behalf causes harm to team members or the people and communities with whom we work, and that we respond in an appropriate, survivor-centered way to any reported issue of exploitation, abuse, harassment, or trafficking.*** At Mercy Corps, safeguarding covers the prevention, detection, deterrence, and response to allegations of sexual exploitation and abuse, child abuse, internal sexual misconduct and human trafficking and exploitation.

We are committed to the core principles regarding prevention of sexual exploitation and abuse laid out by the [United Nations Secretary General in 2003](#) as well as the [2019 Inter-Agency Standing Committee \(IASC\) 6 Core Principles Relating to Sexual Exploitation and Abuse](#). We are also committed to the Principles of a Victim/Survivor-Centered Approach set forth by IASC.

Everyone at Mercy Corps shares a responsibility for safeguarding. This policy outlines **safeguarding roles and responsibilities** and **minimum standards** for the implementation of safeguarding at Mercy Corps. For details on prohibited conduct, reporting obligations and disciplinary consequences, see Mercy Corps' [Code of Ethics](#), [Sexual Exploitation and Abuse of Participants and Community Members Policy](#), [Sexual](#)

[Misconduct Policy](#), [Child Safeguarding Policy](#), [Anti-Human Trafficking and Exploitation Policy](#) and [Speak Out! Policy](#).

All of the guidance, tools, and templates to implement Safeguarding according to this policy can be found on the [Safeguarding Core Standards SharePoint](#) page and in the [Safeguarding Toolkit](#). Relevant guidance documents are also referenced and linked throughout the policy.

2. Scope and Application

2.1 Policy Application

This Policy applies to Mercy Corps Global, Mercy Corps Europe, and Mercy Corps Netherlands, their subsidiaries, and affiliate organizations (collectively, “Mercy Corps”), including members of Mercy Corps’ Board of Directors, officers, management, employees, seconded employees, short-term workers, interns, and volunteers (collectively “team members”).

Relevant sections apply to all country and equivalent programs and to all organizational structures and entities. Sections that do not have a country level requirement are noted.

The Safeguarding Core Standards Policy is intended to outline the full range of organizational safeguarding requirements into one umbrella policy. Some of the standards included in this policy are duplicative of standards in other Mercy Corps Policies. Where this is the case, the other policy is explicitly referenced here. In case of conflict, the most recent policy applies.

2.2 Policy Implementation and Waivers

Country offices, programs and operational units have **until the end of the fiscal year following the release of this policy** (June 30, 2025) to fully comply with its provisions.

Within programs or projects there may be circumstances where an exemption or modification to a specific Safeguarding Core Standard(s) is necessary and appropriate. The default should always be that the standards apply. Exemptions and modifications will be approved only when clearly justified. No waivers or exemptions may be granted for Standards 4, 7, 8, 9 and 10.

Circumstances that may qualify for exemptions or modifications include:

- > New country emergency response set up
- > Research or assessments in new countries for potential set up and registration
- > Countries of less than 12 full time employees

Any exception to a specific Core Standard or other element in this policy will be addressed on a case-by-case basis and ultimately approved by the Senior Director of Safeguarding and the Chief Ethics and Compliance Officer.

To determine when a waiver to this policy may be appropriate, team members should reach out to their country safeguarding team member and/or Regional Safeguarding Advisor. For waivers of standards covered by the Program Management Policy and the PM Toolkit, the waiver may be requested as part of the program management process and does not need to be duplicated.

To request a waiver, the following steps should be taken:

1. Discuss with country safeguarding team and Regional Safeguarding Advisor
2. Complete the [waiver memo template](#)
3. Obtain the approval of the Country Director or equivalent, indicating agreement that an exemption to the Policy is necessary
4. Submit the signed waiver memo to the Senior Director, Safeguarding for review

The Global Safeguarding Team will review each modification memo on a case-by-case basis and discuss with the submitting team. The global team will make a recommendation on whether an exception should be approved and submit the recommendation to the Chief Ethics and Compliance Officer for final approval. The Safeguarding team will communicate the final decision back to the submitting team.

3. Mercy Corps Safeguarding Core Standards

Each country office (or equivalent) and each responsible party listed within this policy is required to prioritize safeguarding in a way that meets the minimum standards detailed below. Within these standards, safeguarding should be approached in a context-appropriate way based on the operating environment, program complexity and regular risk assessments. The Safeguarding Core Standards are designed to ensure that contextualized safeguarding processes align with Mercy Corps Code of Ethics policies, Program Management Policy, other operational policies and procedures, and sector best practice.

These standards outline mandatory requirements and, along with the Safeguarding Toolkit, provide guidance on best practice. Each standard includes specific outputs and identifies responsible parties. In accordance with the [Policy Management Policy](#), **use of “must” and “must not” in this policy denotes mandatory minimum requirements. The use of “should” and “should not” denotes strongly recommended best practice.**

Mercy Corps’ Safeguarding Core Standards

Mercy Corps’ 10 Safeguarding Core Standards are outlined briefly here for ease of reference. They are described in detail further down in this policy.

1. Safeguarding prevention and response roles are in place at the country level
2. Safe recruitment processes are in place
3. All team members receive regular and ongoing safeguarding training
4. Leadership at all levels demonstrate commitment to safeguarding
5. Safeguarding is integrated throughout the program cycle and included in program budgets
6. Partners and contractors are vetted, monitored, and supported appropriately on safeguarding
7. Reporting systems are trusted, operational, accessible and communicated
8. Survivors are treated with respect and provided with appropriate, dignified support
9. Safeguarding investigations are survivor-centered, timely and thorough
10. Images, stories and personal information are gathered, stored and used safely

1. Safeguarding prevention and response roles are in place at the country level

1.1. COUNTRY RISK CATEGORY ASSIGNED & REQUIRED LEVEL OF COUNTRY SAFEGUARDING PREVENTION ROLE IDENTIFIED

Each Mercy Corps Country office or equivalent must have the appropriate level of country safeguarding prevention role in place at all times, commensurate with its safeguarding risk category.

A country's safeguarding risk category is based on 3 factors.

- i. Portfolio size (medium to large; greater than \$30 million USD in life of portfolio value)
- ii. Contextual SEA and GBV risk (greater than 5 according to IASC SEA-RO)
- iii. Programmatic risk (engaging in 1 or more high risk programmatic activities)

Category 1

Where a country has one or fewer of these risk factors, the country prevention role may be fulfilled by a trained and designated focal point.

Category 2

Where two of these factors are present a professional safeguarding role is required at Officer level or above. This role may be shared with a relevant function if necessary.

Category 3

Where all three factors are present a full-time safeguarding role is required at Manager or Advisor level or above.

See [Standard 1 Country Safeguarding Role Requirements](#) for more information and a table of country risk ratings.

Risk categorization should be updated annually during the country's strategy process in consultation with the Regional Safeguarding Advisor. Reassessments may be made if a country's size or portfolio changes significantly during the year.

Output

1. Country risk category assigned

Responsible

1. The Global Safeguarding Team, usually the Regional Safeguarding Advisors, in consultation with country leadership.

1.2. SAFEGUARDING FOCAL POINTS

Only countries at Risk Category 1 may rely on a Focal Point as their lead country safeguarding role. Risk Category 2 and 3 countries, with full-time safeguarding roles, should also have Focal Points wherever possible to support the full-time roles and provide coverage in case of turnover. Focal Point responsibilities must be reflected in the designated team member's position description and other duties reduced accordingly. The minimum Level of Effort (LOE) FPs devote to safeguarding must be 25%. In most cases this LOE should be higher.

Safeguarding Focal Points must successfully complete an in-person training led or designated by the Global Safeguarding Team. Country teams must budget for costs associated with travel and attendance at these training courses.

At a minimum, Safeguarding Focal Points must be available as a reporting avenue for safeguarding concerns, to raise team member awareness around safeguarding policies and reporting processes, to maintain survivor service maps, and provide basic safeguarding technical support to programs and operational teams.

Output

1. Name of Safeguarding Focal Point; position description reflecting at least 25% FP duties

Responsible

1. Country Director or equivalent is responsible for ensuring appropriate safeguarding staffing
2. The Global Safeguarding Team, including the Regional Safeguarding Advisors, are responsible for vetting, training, and providing on-going support to FPs

1.3. PROFESSIONAL SAFEGUARDING ROLES

Countries with two or more risk factors as described in 1.1 may not rely on focal points but must hire safeguarding team members with preexisting relevant skills and capacities commensurate with the level of role.

See [Country Safeguarding Role Requirements](#) for sample position descriptions and details of relevant skills, education and capacities.

Output:

1. Position descriptions and names of full-time safeguarding team members

Responsible

1. Country Director or equivalent is responsible for ensuring appropriate safeguarding staffing
2. The Global Safeguarding Team, including the Regional Safeguarding Advisors, are responsible for providing onboarding and on-going support to full-time safeguarding team members

1.4. SAFEGUARDING CO-INVESTIGATORS

Each Mercy Corps Country or equivalent must have at least 1 trained and designated [Safeguarding Co-Investigator](#) (“Co-I”) to provide survivor sensitive, contextual investigative support for safeguarding investigations. Co-Investigators require a minimum of 5% dedicated LOE. Co-Investigator duties are fulfilled on an on-call basis at the request of the Safeguarding Investigations Team. When not actively supporting investigations, Safeguarding Co-Investigators should conduct at least 1 safeguarding activity per month. To be designated, Co-Investigators must attend a training session provided by the Global Safeguarding Team.

Output:

1. Name of designated and trained Safeguarding Co-Investigator; position description reflecting at least 5% LOE

Responsible:

1. Country Director or equivalent is responsible for ensuring appropriate safeguarding response staffing and for ensuring budget for Co-Investigators to attend trainings
2. The Global Safeguarding Investigation Team is responsible for vetting, training and providing ongoing support to Safeguarding Co-Investigators

1.5. SAFEGUARDING CHAMPIONS

Safeguarding Champions are designated team members who have received safeguarding training which is short of the full focal point training. Safeguarding Champion training may be online or in person. Where a Mercy Corps Country has multiple field offices, each should have a trained and designated [Safeguarding Champion](#) (“SC”) with at least 5% LOE dedicated to safeguarding. Safeguarding Champions should support the Focal Point(s) with training and awareness-raising activities and identifying local support services for the Survivor Service Map. Safeguarding Co-Investigators may act as Champions. Safeguarding Champions must receive in-person or remote

training from the Global Safeguarding Team.

Output:

1. Names of trained Safeguarding Champions

Responsible:

1. Country Director or equivalent is responsible to ensure designation of Safeguarding Champions
2. The Global Safeguarding Team, including the Regional Safeguarding Advisors, and country safeguarding Officers, Advisors and Managers are responsible for vetting, training and providing ongoing support to Safeguarding Champions

2. Safe recruitment processes are in place

2.1. SAFEGUARDING STATEMENT IN POSITION DESCRIPTIONS & NO PRIOR MISCONDUCT ATTESTATIONS

Posted job advertisements and position descriptions for team members and consultants must include safeguarding language and reference our commitments under the [Misconduct Disclosure Scheme](#) (MDS). Please see the [Safe Recruitment Guidance](#) for mandatory language. As part of the application process, applicants must state or attest that they have never violated a sexual misconduct, sexual exploitation and abuse, trafficking, or child safeguarding policy and that, by applying for a role with Mercy Corps, they agree to an MDS review of their prior employment and/or background check.

Output

1. Position description and job advertisement including safeguarding language
2. Inclusion of applicant statement of no prior misconduct during application process

Responsible

1. Global People Team responsible for updating language in templates and sharing with country teams
2. Country HR teams responsible for ensuring safeguarding language is included in all postings

2.2. RISK LEVEL ASSIGNED TO ALL POSITIONS

Positions must be assigned a risk level prior to posting based on the posted role's level of contact with participants and level of leadership accountability. Positions involving higher risk or responsibility will be considered higher risk and will include further safeguarding checks at the time of recruitment. The risk level should be assigned by the hiring manager using the [Safe Recruitment Guidance](#).

Output

1. Risk level rating incorporated into kick-off forms for global/HQ recruitments
2. Risk level rating incorporated into kick-off forms (PAFs or equivalent) for country recruitments

Responsible

1. Hiring Managers responsible for assigning risk level
2. Global People Team responsible for including risk level in global process
3. Country HR teams responsible for including risk level in country process documentation; CD ultimately responsible

2.3. INTERVIEWS INCLUDE SAFEGUARDING QUESTIONS

Interviews for all positions must include safeguarding questions according to the risk level assigned (Level 1 to 3) using the [Safe Recruitment Guidance](#).

Output:

1. Interview notes & assessments for global recruitments include safeguarding interview questions and score
2. Interview notes & assessments for country recruitments include safeguarding interview questions and score

Responsible:

1. People Team and CPO for global recruitments
2. Local HR teams and hiring managers for country level recruitments

2.4. SAFEGUARDING IS INTEGRATED IN REFERENCE CHECKS

Safeguarding questions should be integrated as part of the reference checks for recruitments. All recruitments should include a minimum of 2 reference checks and referees must be asked about any Code of Conduct allegations or violations. References from applicant's most recent position must be requested prior to hiring. Where necessary, these may occur after a soft offer has been made. For a list of suggested safeguarding reference questions, please see the [Safe Recruitment Guidance](#).

Output

1. Reference check form for global recruitments
2. Reference check form for country level recruitments

Responsible

1. Global Talent Acquisition for global recruitments
2. Local HR teams for country recruitments

2.5. BACKGROUND CHECKS

For all positions rated at risk level 2 or 3, background checks must be conducted wherever possible or where legally required. See [Background Check Policy](#). Where background checks are not possible, this must be documented in the recruitment file.

Output

1. Background check records for global recruitments
2. Background check records for country recruitments in countries where background checks are possible

Responsible

1. Global Talent Acquisition for global recruitments
2. Local HR teams for country recruitments

2.6. MISCONDUCT DISCLOSURE SCHEME AND INTERNAL MDS CHECKS

[Misconduct Disclosure Scheme](#) (MDS) checks must be requested for all applicants who have prior experience in the sector. Where an applicant has previously worked for, or is currently working for Mercy Corps, an internal MDS check must be made via seahreferencecheck@mercycorps.org.

Output

1. MDS email records and notes in file for global recruitments
2. MDS email records and notes in file for country level recruitments

Responsible

1. Global Talent Acquisition for global recruitments responsible for requesting MDS and internal ethics checks for global recruitments
2. Local HR teams responsible for requesting MDS and internal ethics checks for country level recruitments
3. Case Intake Manager responsible for responding to external MDS requests and internal ethics checks

2.7. SAFEGUARDING IN EMERGENCY RECRUITMENTS

For urgent hiring in emergency responses, it is usually necessary to expedite the recruitment process. In such situations MDS, background and reference checks may be conducted after hiring with offers rescinded where necessary. At minimum a safeguarding question should be included in every emergency recruitment interview process. The [Emergency Recruitment Code of Conduct](#) should be signed before new team members engage with participants.

Output

1. Completed reference checks, MDS requests and background checks

Responsible

1. Global People Team

2.8. RESPONDING TO REFERENCE REQUESTS

Only HR team members may provide references that verify a team member or former team member's scope and dates of employment with Mercy Corps. Before providing employment verification for a former team member, an internal MDS check must be made via seahreferencecheck@mercycorps.org.

Managers and other team members may provide personal references only and must clearly direct the person requesting the reference to Mercy Corps' HR team to verify employment and rehire eligibility. When requested by another organization to provide a personal reference for former or current team members, all team members must first check with the HR team before providing the personal reference. Mercy Corps letterhead must not be used to provide personal references.

Output:

1. Internal ethics check records
2. HR records at global and country level

Responsible:

1. Managers or other team members from whom references are requested
2. Ethics department is responsible for responding to internal misconduct checks
3. HR teams responsible for responding to reference checks

3. All team members receive regular and ongoing safeguarding training

3.1. ANNUAL CODE OF ETHICS TRAINING

All Team members must complete mandatory Code of Ethics e-learning courses and certify that they have read, understood and agreed to the Code of Ethics within 30 days of hire and annually thereafter.

Output:

1. Mandatory course completion records

Responsible:

1. Hiring Managers, Country Directors and heads of HQ departments
2. The ECD and People Team are responsible for keeping course content up to date and managing Talent Development platform

3.2 SAFEGUARDING IS INTEGRATED INTO ORIENTATIONS FOR NEW TEAM MEMBERS

Country, regional, headquarters, and other departments implementing onboarding sessions for new team members must include safeguarding components. Before engaging with participants, new team members must undergo safeguarding orientation. Safeguarding orientation should include key definitions, overview of safeguarding policies, power dynamics, contextual issues and challenges, how and what to report, barriers to reporting, and non-retaliation. Detailed guidelines on content and who should deliver these sessions can be found in the Onboarding SharePoint and in Standard 3 Guidance.

Within the first week of employment, managers must ensure that every new team member is informed about Mercy Corps' commitment to safeguarding, their responsibility to report concerns, and the appropriate channels for reporting concerns.

Country-specific orientation materials, including on SharePoint, should include the names of country safeguarding roles.

Output:

1. Safeguarding orientation material
2. Where applicable, orientation agenda (or matrix) which includes safeguarding
3. Manager checklist includes reference to safeguarding

Responsible:

1. Orientation generally delivered by country safeguarding team member or by HR team member trained by Safeguarding Focal Point to deliver safeguarding orientation
2. Global Safeguarding Team to provide orientation material and guidance to team members delivering orientation

3.3 REGULAR FACE TO FACE TRAINING

Team members who have contact with participants must participate in relevant awareness raising sessions on safeguarding at least 2 times per year. Sessions may be in-person or remote but must be live and include opportunities to ask questions. Team members who do not have contact with participants should participate in awareness raising sessions on safeguarding at least once a year.

These training sessions should be at least an hour in length, participatory, contextual and provide opportunities to ask questions. They should cover Mercy Corps' safeguarding policies, power dynamics, contextual issues and challenges, how and what to report, barriers to reporting, and non-retaliation. (This list is not exhaustive. Other topics may be chosen as relevant in coordination with the safeguarding team).

Output:

1. Training participation tracker
2. Safeguarding training materials

Responsible:

1. Training generally delivered by Safeguarding Focal Points and other country Safeguarding roles
2. Person delivering training responsible for completing training participation tracker

3. Managers responsible for ensuring team members receive training
4. Global Safeguarding Team and country level safeguarding managers and advisors to provide ongoing and updated content and TOT for Focal Points and Champions
5. Global Safeguarding Team responsible for offering HQ training sessions

4. Leadership at all levels demonstrate commitment to safeguarding

4.1. SENIOR MANAGEMENT TEAM REGULARLY DISCUSSES SAFEGUARDING

Safeguarding risks and the status of mitigation activities must be regularly discussed at senior management team (SMT) meetings and must be a standing agenda item.

Output:

1. SMT agenda and minutes taken

Responsible:

1. Country Director and SMT Safeguarding Lead resp (see 4.2)

4.2. SAFEGUARDING LEAD DESIGNATED ON SENIOR MANAGEMENT TEAM

The Country Director must designate a Safeguarding Lead on the Senior Management Team (SMT) or Extended Senior Management Team (ESMT). If there is a professional safeguarding role country, they may fulfil this position at the SMT or ESMT level. The Safeguarding Lead will engage with country safeguarding support roles and the Regional Safeguarding Advisor to discuss safeguarding risks and mitigations. The SMT Safeguarding Lead is responsible for raising safeguarding concerns and facilitating discussions at SMT or E-SMT meetings. Please see the [Leadership Guidance](#) for further information.

Output:

1. Designated SMT or ESMT Safeguarding Lead
2. Relevant action points from E-SMT or SMT safeguarding discussions

Responsible:

1. Country Director
2. SMT or E-SMT Safeguarding Lead

4.3. SAFEGUARDING INCLUDED IN THE COUNTRY RISK MATRIX

The Country Risk Matrix must include safeguarding risks and relevant mitigations and be reviewed on a regular basis as per internal country office process. See sample Country Risk Matrix text in the [Leadership Safeguarding Guidance](#).

Output:

1. Country Risk Matrix includes internal and external safeguarding risks

Responsible:

1. Country Director (with support from country or Regional Safeguarding Advisor)

4.4. COUNTRY LEADERS RECEIVE SAFEGUARDING TRAINING

Country Directors and Directors of Programs must participate in safeguarding training at least once per year. Other SMT members should participate where possible. This training should provide an overview of regional investigative trends and lessons learned. It should include scenarios to increase practical knowledge around safeguarding prevention and response and prepare leaders for

challenging circumstances. Training may be provided by the Global Safeguarding Team (including Regional Safeguarding Advisors) or by local safeguarding teams. Training may be remote or in-person.

Output:

1. Training records and presentations

Responsible:

1. Global Safeguarding Team and Country Director

4.5. COUNTRY COMMUNICATIONS ON SAFEGUARDING

Country Directors and SMT members should communicate regularly on the importance of safeguarding to their teams. Country Directors must communicate to all team members about safeguarding at least twice per year. They should reinforce the team's commitment to safeguarding prevention, reiterate zero tolerance for violations, encourage reporting, reiterate the importance of building safeguarding into work streams, and promote a respectful and inclusive culture. Communications should also request feedback on safeguarding implementation. Please see the [Leadership Guidance](#) for further information on how to communicate the importance of safeguarding.

Output:

1. Emails, workplace posts, or other communications

Responsible:

1. SMT members

5. Safeguarding is integrated throughout the program cycle and included in program budgets

5.1. PROGRAM IDENTIFICATION: FUNDING APPLICATION PROCESSES

Safeguarding should be considered and mentioned from the outset of funding application processes. When Mercy Corps submits a full proposal, the narrative section must mention Mercy Corps' commitment to safeguarding. Wherever donor templates allow the narrative should include a description of Mercy Corps' safeguarding approach, the definition of safeguarding and a brief description of planned mitigations for program implementation. Wherever donor templates allow concept notes should include a reference to safeguarding and link relevant safeguarding policies. Suggested language is available in the [Safeguarding Proposal Guidance](#) document along with specific donor requirements.

Where program design kick-off meetings (or similar) take place, they must include safeguarding on the agenda with a designated team member (safeguarding lead) appointed to discuss safeguarding risks and mitigations related to the program design and implementation.

Output:

1. Concept notes and proposals include safeguarding
2. Grant kick-off meeting agenda and attendee list includes safeguarding and designates a safeguarding lead

Responsible:

1. Program Managers, or proposal drafters, (including New Initiatives and Desk) are responsible for integrating safeguarding in proposals and concept notes
2. Grant staff member(s), or equivalent, are responsible for inviting the safeguarding lead

(Usually the country Safeguarding Focal Point, full-time safeguarding team member or Regional Advisor) to the kick-off meeting and ensures safeguarding is on the agenda

5.2. PROGRAM IDENTIFICATION: INTEGRATING SAFEGUARDING RISKS AND MITIGATIONS

Each program must identify safeguarding risks related to their context, type of programming and mode of delivery (I.e. via partners, engagement of short-term workers, etc.). Safeguarding risk assessments must articulate contextual and practical mitigations, persons responsible for follow up, and resources needed. Risk assessment must take place at the design phase and should be revisited at least annually during program implementation. Safeguarding risks may be assessed in as part of existing risk assessment processes (including those required by donors). See the [Safeguarding Risk Assessment Tool](#) which includes a database of safeguarding risks and recommended mitigations, and a risk assessment template.

Output:

1. Risk assessment that includes assessment of safeguarding risk and proposed mitigations

Responsible:

1. Program teams are responsible for integrating safeguarding risks and mitigations in their existing risk assessment

5.3. PROGRAM DESIGN: BUDGETING FOR SAFEGUARDING ACTIVITIES

Program budgeting processes must consider safeguarding and allocate sufficient budget to carry out key safeguarding activities in accordance with this policy and assessed program risks. Safeguarding budget may be allocated as separate line items or included as other activities e.g., training team members, partner training, translation costs or printing materials. Program teams should review the [Safeguarding Budgeting Guidance](#) and select relevant activities to include in the budget, budget narrative and proposal narrative, including necessary safeguarding staffing requirements.

Output:

1. Program budget and budget narrative includes budget for safeguarding activities and/or team members proportional to program safeguarding risk level

Responsible:

1. Program Managers are responsible for including safeguarding activities and/or team members in the budget and budget narrative

5.4. PROGRAM PLANNING AND IMPLEMENTATION: HIRING AND ONBOARDING SHORT TERM (DAILY) WORKERS

All short-term workers must receive a safeguarding orientation prior to engaging in program activities. See [here](#) for the guidance. The orientation must include information on prohibited conduct, their own right to be free from exploitation and abuse and information on how to safely report, including via CARM and the Integrity Hotline. This orientation may be done remotely or in-person but must include the opportunity to ask questions. Short term workers must not spend one on one time alone with participants.

Output:

1. Short term workers receives orientation on safeguarding and how to report any concerns
2. Short term worker receives Short-term Worker Code of Conduct (by WhatsApp or other relevant medium) and signs where possible

Responsible:

1. Department that is requesting and hiring short term workers; collaboration with Safeguarding Focal Point and/or Regional Safeguarding Advisor

5.5. PROGRAM DESIGN AND IMPLEMENTATION: PARTICIPANT AND COMMUNITY AWARENESS RAISING

Safeguarding awareness raising must be carried out with program participants and communities throughout the program lifecycle in addition to communications about reporting channels. Team members and partners who have regular contact with participants should share information about a participant's right to be free from exploitation and abuse, the expectations we hold of anyone who works on our behalf and our commitment to a survivor-centered response to all reports.

Output:

1. Information, Education and Communication (IEC) materials used to raise awareness amongst participants
2. Training and Sensitization Self Reporting Tool submitted

Responsible:

1. Global Safeguarding Team provides awareness raising material
2. Program Managers are responsible for ensuring community awareness raising is built into program activities
3. Facilitator of awareness raising session completes Self Reporting Tool
4. Global Safeguarding Team member conducting field visits completes Trip Report

5.6. PROGRAM DESIGN AND IMPLEMENTATION: SUPERVISION AND APPROPRIATE STAFFING

Team members must never be alone with a participant child or children.

Program activities should be implemented with as diverse and gender-balanced teams as possible to safely undertake the activity, ensure quality implementation, and mitigate any potential safeguarding risks.

Team members should never be completely alone with a participant (e.g. not in the presence of other team members, participants, family or community members). Household visits should take place in a minimum of pairs. Activities with female youth, children, women, and majority female-headed households should have female team members present wherever possible. See [Safeguarding Program Guidance](#) for further information. Programs that focus on child protection, youth engagement, or GBV must follow sector standards for supervision and staffing, which may be more stringent. See guidance.

Output:

1. GDI diagnostic or other records of efforts to ensure diverse and gender balanced teams
2. Monitoring visit report e.g. Trip Report from Global Safeguarding Team, PDM

Responsible:

1. Program teams and DoPs
2. Team member completing monitoring report

5.7. PROGRAM IMPLEMENTATION: MEASUREMENT AND LEARNING

Where baseline and endline surveys are conducted, a safeguarding question must be included. [See here](#) for sample questions.

Other forms of regular data collection should incorporate safeguarding, including measurement of participant perception of safety, awareness of right to be free from abuse and exploitation, and awareness of reporting mechanisms.

Final Internal Performance Reviews should incorporate analysis of safeguarding data gathered and lessons learned.

Output

1. Baseline and endline survey includes at least one safeguarding question

Responsible

1. MEL and Program management

5.8. COMPLEX PROGRAMS

Complex programs should include safeguarding representation on the complex program board wherever possible. Complex programs that target children must include safeguarding representation on the complex program board, usually a safeguarding manager, advisor or regional safeguarding advisor. See standard 1 for required roles country & definition of higher risk programs.

Output

1. Risk classification
2. Complex Board membership

Responsible:

1. Program management

5.9. SAFEGUARDING IN EMERGENCIES

In humanitarian settings, affected people are at increased risk of sexual exploitation and abuse due to multiple factors such as forced displacement, increased violence (including GBV), loss of family members, loss of access to services (health, education, etc.), or loss of income. If a country has an Emergency Preparedness Plan, it should include provisions to address safeguarding concerns during an emergency. At the outset of an emergency response, the [Safeguarding Emergency Checklist](#) should be used to manage safeguarding priorities.

Output:

1. Emergency team reviews [Safeguarding Emergency Checklist](#) at onset of response and fills in the names of the team members with a safeguarding task and assess if a safeguarding task has been completed or not
2. Safeguarding is integrated in the emergency preparedness planning process, if available, and a person is assigned to coordinate safeguarding at the onset of an emergency response
3. Safeguarding risks are included in risk assessments during emergency responses

Responsible:

1. Program management; with support from Safeguarding Focal Point, country safeguarding team member and/or Regional Safeguarding Advisor

6. Partners and contractors are vetted, monitored, and supported appropriately on safeguarding

6.1. SUBAWARD AGREEMENTS

Mercy Corps and its subrecipients share a common commitment to upholding the rights of all participants and community members. Subrecipients are expected to adhere to the core elements of Mercy Corps' safeguarding policies. Clauses committing subrecipients to our safeguarding policies or the equivalent must be included in subaward agreements and subrecipients must agree to comply with all terms.

Output:

1. Subaward templates
2. Subaward language in awards

Responsible:

1. Grant Compliance Support Team at Mercy Corps Global and Mercy Corps Europe where applicable
2. Country finance and subaward teams
3. Program Managers and grant management teams

6.2. SUBRECIPIENT JOINT SAFEGUARDING ASSESSMENT AND MONITORING PLAN

All subrecipients must complete a set of basic safeguarding questions at the due diligence stage before a subaward agreement is signed in line with the requirements included in the Subaward Manual¹. These questions assess whether or not a partner has safeguarding policies, processes and other good practice measures in place and highlight where a given partnership may present an elevated level of safeguarding risk. The team member receiving the completed form must share the responses with the relevant program team and the country safeguarding team so they can complete a follow-up Joint Partner Assessment and determine if the subrecipient's safeguarding policies are substantially similar to Mercy Corps. When the subrecipient does not have these policies and processes in place, the partnership may involve Mercy Corps assuming an elevated level of risk. This should be noted by the relevant team working with the subrecipient to ensure that sufficient mitigation measures are put in place and agreed to by the subrecipient and to plan for appropriate support to the partner depending on the length of the partnership.

Output

1. Completed Partner Joint Assessments and Monitoring Tool
2. Completed pre-subaward due diligence forms

Responsible:

1. Country or global subaward team leading due diligence checks at the pre-award stage
2. Country safeguarding team, with support of regional advisor, follows up with Joint Partner Assessment as necessary.

6.3. PARTNER CODE OF CONDUCT

All subrecipients who do not have Safeguarding Policies substantially similar to Mercy Corps' (and in line with IASC PSEA Principles) must receive the Mercy Corps [Partner Code of Conduct](#) and agree to have all team members working on the Mercy Corps project sign it and receive training and

¹ Formerly the Subaward Financial Management Policy (SFMP)

awareness raising on its content.

Output:

1. Signed Partner Code of Conduct
2. Training and course completion records

Responsible:

1. Program Managers, subgrant team

6.4. CONTRACTED PARTIES (INCLUDING CONSULTANTS, SUPPLIERS AND SERVICE CONTRACTORS)

Mercy Corps engages with numerous contracted parties of different types and sizes. Contracted parties may include service contractors, consultants, suppliers or other outside experts who engage with Mercy Corps via contract.

Many parties we contract with cannot reasonably be expected to develop their own safeguarding policies, processes, or reporting mechanisms, therefore they must agree to accept or adopt Mercy Corps' safeguarding policies and procedures. Procurement contracts must include a commitment to uphold Mercy Corps Code of Ethics and safeguarding policies. Scopes of Work or equivalent contracted parties must include a link to the [Supplier Code of Conduct](#) and an agreement to share it with individuals working on the Mercy Corps project.

Where contracted parties will have regular contact with participants and/or team members, they must be provided with orientation on Mercy Corps safeguarding commitments, including prohibited conduct and how to report violations. Non-subaward partners interacting with participants should be under the supervision of Mercy Corps team members as much as possible.

Output:

1. Signed contract with supplier which includes safeguarding language
2. Scope of Work includes link to the Supplier Code of Conduct

Responsible:

1. Team member from Operations (e.g. Procurement)
2. Department requesting the contractor
3. Global Safeguarding Team provides safeguarding language and Supplier Code of Conduct

6.5. OTHER PARTNERSHIPS AND COLLABORATIONS

Mercy Corps may collaborate, partner or enter into agreements with entities via means other than subaward or contract, for example by a memorandum of understanding (MOU). Wherever another entity could be viewed to be working on Mercy Corps' behalf, the MOU or agreement must articulate a shared commitment to the prevention of sexual exploitation, abuse, harassment and trafficking.

Output:

1. Language included in MOU or agreement

Responsible

1. Mercy Corps team member signing MOU or agreement

6.6. MERCY CORPS AS A LEAD IN CONSORTIA

All subrecipients in a consortium with Mercy Corps must agree to the IASC principles. Subrecipients who do not have Safeguarding Policies substantially similar to Mercy Corps (and in line with IASC PSEA Principles) must receive the Mercy Corps [Partner Code of Conduct](#) and agree to have all team members working on the Mercy Corps project sign it and receive awareness raising on its content. Whenever Mercy Corps is a lead in a consortium, we have an obligation to highlight and lead safeguarding discussions. This means ensuring safeguarding is seen as a priority by all partners involved, key challenges are discussed, and learnings are shared.

Output:

1. Mercy Corps requests a copy of each subrecipient's program risk assessment which must include safeguarding risks
2. Safeguarding is a standing agenda item when Mercy Corps is a lead in a consortium. See the [Consortium Lead Safeguarding Checklist](#) for guidance.

Responsible:

1. Chief of Party (or equivalent) is responsible for ensuring safeguarding is included in risk assessments and as a standing agenda item.

7. Reporting systems are trusted, operational, accessible and communicated

7.1. ACCESSIBLE REPORTING MECHANISM FOR TEAM MEMBERS AND PUBLIC

Mercy Corps must maintain a central reporting system or “Integrity Hotline”, which includes multiple accessible, responsive and confidential reporting channels, provides options for reporting in multiple languages, and allows for anonymous submissions.

Output:

1. Functional Integrity Hotline and email reporting at integrityhotline@mercycorps.org

Responsible:

1. Ethics & Compliance Department

7.2. COMMUNITY ACCOUNTABILITY REPORTING MECHANISM (CARM)

A robust and effective CARM (Community Accountability Reporting Mechanism) system is crucial for Mercy Corps and must be operational in each Mercy Corps country (or equivalent). CARM ensures that there are established trusted channels for participants and non-participants of our programs to provide feedback, including on team member behavior. The implementation of a successful CARM system significantly enhances the likelihood of community members reporting safeguarding concerns. CARM systems must be budgeted for outside of safeguarding budget. All Grade 6 feedback must be reported to the Integrity Hotline according to CARM protocols. See also [CARM Policy](#) and [Program Management Policy](#).

Output:

1. See [CARM policy](#) for outputs, including community sensitization materials

Responsible:

1. See [CARM policy](#) for CARM roles and responsibilities; PAQ Director in country teams
2. Global Safeguarding Team and Safeguarding Focal Points and Champions responsible for providing technical support if needed

7.3. COMMUNITY AWARENESS AND INFORMATION SHARING

Our commitment to accountability and transparency extends to ensuring communities understand

their right to be free from exploitation and abuse and the expectations we hold of anyone who works on our behalf. Per the [CARM Policy](#), programs must include community sensitization activities to ensure that communities are aware of the channels available for them to provide feedback, what we mean by feedback and how Mercy Corps or partner organizations manage that feedback. To meet both the CARM standard and this Safeguarding Standard, programs must take steps to ensure that community members are informed, in a contextual and accessible way, of the following points at a minimum.

- That Mercy Corps holds its team members, partners, contractors and consultants to the highest ethical standards
- That Participants and community members should always be treated with respect and dignity
- That all aid is free, and that no one should ever ask anything of participants in exchange for assistance, including money, goods, services, or sex.
- How to safely report concerns and that the process is confidential and survivor-centered

See [Community Sensitization Guide](#) for further guidance around how and when to share this information.

Output:

1. Community sensitization materials, see [Community Sensitization Guide](#) for further guidance
2. Number of consultations held with program participants and community members

Responsible:

1. Program Director
2. See [CARM policy](#) for CARM roles and responsibilities; PAQ Director at country level
3. Global Safeguarding Team and Safeguarding Focal Points and Champions responsible for providing technical support around safeguarding related community sensitization

7.4. INTEGRITY HOTLINE COMMUNICATIONS

Information about the Integrity Hotline and Mercy Corps [Speak Out! Policy](#) must be posted on Mercy Corps external and internal website. Additional regular communications about the Integrity Hotline reporting platforms and the protection of whistleblowers should be provided to all team members.

Mandatory Safeguarding and Ethics informational posters, including Integrity Hotline and reporting pathway posters, must be posted in all office locations. Local Integrity Hotline phone numbers should be posted if available.

Output:

1. Integrity Hotline information posted on Mercy Corps internal and external website.
2. Hotline posters placed visibly in frequent-access locations in all HQ and country offices

Responsible:

1. The Ethics & Compliance Department (ECD) is responsible for ensuring Integrity Hotline platform information is posted on Mercy Corps external and internal websites. The ECD is responsible for creating, updating, and distributing additional communications materials and mandatory posters
2. Country admin teams are responsible for displaying posters
3. Safeguarding Focal Points are responsible for ensuring posters are up to date and in place

7.5. DATA ON SAFEGUARDING REPORTING TRENDS GATHERED AND ANALYZED; GAPS ADDRESSED

Mercy Corps must regularly analyze data from safeguarding reporting and investigations to identify trends and gaps in safeguarding reporting, including use of various reporting channels. Information regarding trends should be shared with regional and country teams as needed and additional support will be provided for countries with low reporting.

Output:

1. Triannual reports to Joint Ethics and Safeguarding Committee outlining safeguarding reporting trends.
2. Support and additional training plans for countries with low reporting

Responsible:

1. Ethics & Compliance Department

8. Survivors are treated with respect and provided with appropriate, dignified support

8.1. SURVIVOR-CENTERED APPROACH

Mercy Corps is committed to the [Principles of a Victim/Survivor-Centered Approach](#) set forth by the Inter-Agency Standing Committee and the [UN Victim's Rights Statement](#). These principles place the rights, wishes, needs, safety, dignity, and well-being of the victims/survivors at the center of all safeguarding prevention and response measures.

Output:

1. Guidance, training curricula and records around survivor-centered approach
2. Survivor feedback

Responsible:

1. Everyone at Mercy Corps; SG Investigators; Safeguarding Regional Advisors, Focal Points, Champions

8.2. SURVIVOR SERVICES IDENTIFIED, VERIFIED AND SHARED

Each country office must have and maintain a [survivor service map](#) to ensure we are able to support survivors with timely referrals to services. Service maps should be updated annually with new services, and ensure all identified referral pathways are functioning, safe, and of good quality.

Output:

1. Annually updated [survivor service map](#) in each country
2. Membership of country level PSEA Task Force or other Protection/GBV networks

Responsible:

1. Country safeguarding roles, Advisor, Manager, Officer, Focal Point and/or Champion.

8.3. SUPPORT SERVICES OFFERED TO ALL IDENTIFIED SURVIVORS

Any identified survivors must be offered holistic assistance and support, whether or not the victim/survivor initiates or cooperates with an investigation. Information on the types of support available should be shared with survivors, including the presence of locally available and contextually appropriate services in the survivor's own language whenever possible. These may include but are not limited to:

- A. Medical care (including for any physical injuries, emergency contraception, testing and treatment for sexually transmitted infections, and post exposure prophylaxis such as rape kits)
- B. Safety, including temporary relocation or accommodation
- C. Mental Health and Psychosocial Support (MHPSS)
- D. Legal Assistance
- E. Child protection services
- F. Transportation and/or logistics support to access the above

Output: (note investigation and survivor support outputs to be verified only through confidential case reviews conducted by ECD with PII removed)

- 1. Referral documentation
- 2. Data collected on percentage of internal and external survivors who choose to access support services
- 3. Case file document that records the support services offered

Responsible:

- 1. Safeguarding Investigator, with support of Safeguarding Focal Point/Champion/Regional Advisor responsible for ensuring offer of support is made
- 2. Country Team responsible for arranging support and logistics (such as transportation, finance etc.).

8.4. SURVIVOR LIAISON

Identified survivors must be offered connection with a Mercy Corps support person, separate from the investigative team (usually a country safeguarding role or Regional Safeguarding Advisor) to accompany the survivor, in accordance with the survivor's wishes, from the point of initial contact, through any investigative process and beyond, and to provide ongoing information about, and referrals to, accessible and quality support services as described in 8.3.

Output:

- 1. Case files document that the offer was made and who was identified as the liaison (Reviewed only with PII removed as part of internal safeguarding reviews/audits)

Responsible:

- 1. Safeguarding Investigator, with support of Safeguarding Focal Point/Champion/Regional Advisor responsible for ensuring offer of support is made

8.5. SURVIVOR FEEDBACK IS SOUGHT

Survivors must be offered the opportunity to provide feedback, formally or informally, on the reporting and investigative process, the support services they were offered and/or accessed, and prevention gaps as relevant. Survivor reflection and experience should be taken into account for learning and improvement for prevention and investigation teams.

Output:

- 1. Satisfaction survey, conversation notes, email trail or another means of gathering information that the survivor is comfortable with or prefers (reviewed only with PII removed as part of internal safeguarding reviews/audits)
- 2. Process improvements made based on survivor feedback

Responsible:

- 1. Safeguarding Support Partner, Safeguarding Investigator

9. Safeguarding investigations are survivor-centered, timely and thorough

9.1. TIMELY, THOROUGH, IMPARTIAL RESPONSE PROCESS

All Safeguarding allegations reported to the Ethics & Compliance Department (ECD) must be assessed to determine whether an investigation is warranted. Reporters must receive a response within 2 business days acknowledging that their report has been received. Investigations must be professional, survivor-centered, timely, thorough, impartial, and conducted in accordance with procedures defined in the ECD's Investigation Manual. Donor and regulator notifications must be made in accordance with the ECD's Donor Notification SOPs. Safeguarding investigations must be followed by an investigative closing report which includes findings and any recommended disciplinary action and corrective measures. All safeguarding investigative materials and closing reports must be stored in a confidential and secured database. Survivors must receive regular updates on the status of investigations.

Output:

1. Investigative case files
2. Donor notifications
3. Investigative Closing Reports
4. Case closure time statistics

Responsible:

1. The ECD's Safeguarding Investigations team

9.2. SURVIVOR-CENTERED INVESTIGATION

The ECD's survivor-centered investigative approach will ensure the needs and priorities of survivors are an essential consideration before, during, and after an investigation. This approach includes, but is not limited to, respecting and upholding the dignity, needs, safety, and confidentiality of the survivor and ensuring survivors have the support they need. A survivor's wishes, needs and perspective will be taken into account at all times. We also have a duty of care to prevent further harm to participants, community members and team members.

Investigations are led by the ECD and managed by professional SEAH investigators. Investigators must continuously assess risk using dynamic risk assessments to identify any needs or threats to the safety of the survivor and those involved in safeguarding investigations. Survivors must be kept informed of the status of any investigation in which they are involved.

Output:

1. Dynamic Risk Assessments
2. Investigative case files
3. Survivor referral forms

Responsible:

1. The ECD's Safeguarding Investigations team

9.3. APPROPRIATE DISCIPLINARY AND CORRECTIVE ACTIONS

All substantiated allegations must be followed by appropriate, proportional disciplinary action and/or corrective measures in line with Mercy Corps Code of Conduct Safeguarding Policies and these Core Standards.

Output:

1. Disciplinary and corrective measures recommended in safeguarding investigations

- closing reports
2. Hand off document from Investigative team to prevention team to follow up on non-disciplinary corrective actions.

Responsible:

1. The ECD is responsible for providing recommendations to the People Team, Regional Directors, or Country Directors as applicable
2. The People Team, Regional Directors, or Country Directors or other department heads as applicable are responsible for ensuring appropriate disciplinary action is carried out
3. The safeguarding prevention team, usually led by the appropriate Regional Advisor, is responsible for following up to support corrective measures.
4. Country or relevant department leadership (for HQ cases) responsible for implementing recommended corrective actions

9.4. DATA COLLECTED AND REPORTED ANNUALLY

Data on the outcome of safeguarding investigations will be analyzed and provided regularly to the Board for review. To ensure we fulfill Mercy Corps' commitment to transparency surrounding safeguarding reports and investigations, the ECD will publish an Annual Safeguarding Report including the number and type of safeguarding allegations received globally, the number of substantiated cases, and disciplinary actions.

Output:

1. Annual Safeguarding Report
2. Triannual reports to Joint Ethics and Safeguarding Committee (JESC)

Responsible:

1. Global Safeguarding Team responsible for annual report
2. The Safeguarding Investigations team responsible for gathering data and reporting to JESC

10. Images, Stories and Personal Information are Gathered, Stored and Used Safely

10.1. INFORMED CONSENT

We have a responsibility to ensure we do not cause harm or violate participant rights when gathering and using content from contributors. Participants and community member contributors have the right to understand how images and stories that identify them may be used and decide if they consent to those uses. Any team member, partner or visitor must obtain informed consent prior to taking an identifiable image, video or story of a child or adult. Parents, caregivers or guardians must provide consent for the use of identifiable images or stories of children under 18. A child above the age of 12 must provide informed consent in addition to a parent or guardian. The Mercy Corps content gatherer must explain how the image and/or story may be used and for how long. Written, signed consent should be obtained wherever possible. See here for Mercy Corps' [consent form](#) and further guidance [here](#).

Output:

1. Documented record of consent; signed consent forms

Responsible:

1. Media and photography team
2. Anyone taking photos at Mercy Corps sites

10.2. DATA STORAGE, INCLUDING SURVIVORS

Images and stories of participants, particularly children, must be stored safely, in accordance with the [Responsible Data Policy](#). Information involving survivor identity, such as safeguarding investigation files and referrals to survivor support must be stored in a safe, limited-access platform/database. Only those who absolutely need to be involved in an investigation or its closure may have access.

Output:

1. Implementation of responsible data policy records
2. Secure safeguarding platform/database

Responsible:

1. Media and photography team
2. Program managers
3. ECD for safeguarding platform/database

10.3. SOCIAL MEDIA

Team members must be made aware that they should not retain, share or post identifiable images of children or participants to their social media channels or any online platform. See [Social Media Guidelines](#) and Mercy Corps [Code of Ethics](#).

Output:

1. Signed copy of Code of Ethics
2. Presentations that include information on responsible use of images/stories and social media

Responsible:

1. All team members
2. CDs and managers

4. Related Policies, Procedures and Guidance

4.1 [Mercy Corps Code of Ethics](#)

4.2 Code of conduct policies and related guidance

[Anti-Fraud and Anti Corruption Policy](#)

[Anti-Human Trafficking and Exploitation Policy](#)

[Child Safeguarding Policy](#)

[Conflict of Interest Policy](#)

[Speak Out! Policy](#)

[Prevention of Sexual Exploitation and Abuse of Program Participants and Community](#)

[Members Policy](#)

[Sexual Misconduct in the Workplace Policy](#)

4.3 Additional policies

[CARM Policy](#)

[Program Management Policy](#)

[Program Record Retention and Archiving Policy](#)

[Responsible Data Policy](#)

[Procurement Policies and Procedures \(HP3\)](#)

[Field Procurement Policies and Procedures \(FP3\)](#)

5. Definitions and Acronyms

Safeguarding: Our responsibility to ensure team members, operations and programs do not harm those we work with or put vulnerable populations at risk of abuse or exploitation. At Mercy Corps, safeguarding is an umbrella term that covers the prevention, detection, deterrence, and response to allegations of sexual exploitation and abuse, child abuse, internal sexual misconduct and human trafficking.

Participants: Individuals who have received a tangible benefit from a program, either as the actual program participants or the intended recipients of the program benefits.

Prevention of Sexual Exploitation and Abuse (PSEA): Actions, policies and efforts aimed at preventing sexual exploitation and abuse. Also refers to Mercy Corps' [Prevention of Sexual Exploitation and Abuse Policy](#)

Child Safeguarding: Our obligation to ensure the safety and dignity of all children we come into contact with and a fundamental commitment to the best interests of children at all times

CARM: Community Accountability Reporting Mechanism

Local communities: Any village, town, sub-district, etc. where Mercy Corps Team Members or Partners conduct any program-related activities

CECO: Chief Ethics and Compliance Officer

ECD: Ethics and Compliance Department

Short-term Worker: Umbrella term for person hired for short term support to program or office needs. Short-term workers are often from the local community and may, in some cases, also be program participants. The terms “short-term worker”, “daily worker,” “casual labor,” and “volunteer” are often used interchangeably.

Global Safeguarding Team: The prevention focused safeguarding team led by the Senior Director of Safeguarding and reporting to the CECO; includes HQ roles and the Regional Safeguarding Advisors; distinct from country safeguarding roles and teams.

JESC: Joint Ethics and Safeguarding Committee of the Mercy Corps Board

MEL: Monitoring, Evaluation, and Learning

PaQ: Program Performance and Quality

Protection: Preventing, reducing, and responding to the risks and consequences of existing and evolving violence, deprivation, and coercion

Protection mainstreaming: ensuring participant's meaningful inclusive participation to services and activities by mitigating external risks and barriers to their safety, dignity, and access across all programs and preparations to adequately refer harmed and at-risk individuals seeking assistance

GESI: Gender Equality and Social Inclusion

GDI: Gender, Diversity and Inclusion

Partners: Sub-recipients, partner organizations, contractors, consultants and any other organization or individual that acts on Mercy Corps' behalf (collectively, "Partners")

Program: Group of related projects managed in a coordinated way to obtain benefits and control that are not available when managed individually.

Safeguarding Investigations Team: Led by the Director of Safeguarding Investigations; global team of trained safeguarding investigators; lead investigations into child safeguarding, sexual exploitation and abuse, child safeguarding, and trafficking allegations; part of the ECD

SOP: Standard Operating Procedure

Sub-recipient: An entity receiving a subaward. A subrecipient cannot be a program participant

Visitors: Individuals or groups external to Mercy Corps who physically or virtually attend Mercy Corps events or visit Mercy Corps offices, facilities or program sites

6. Roles and Accountability

6.1 Headquarters

JOINT ETHICS AND SAFEGUARDING COMMITTEE (JESC)

The Joint Ethics and Safeguarding Committee is responsible for reviewing global safeguarding metrics and major incidents. The JESC is also responsible for ensuring that necessary investigations have adequate investigation resources and that safeguarding prevention is resourced sufficiently to meet donor standards and sector best practice.

MERCY CORPS' CHIEF ETHICS AND COMPLIANCE OFFICER

The Chief Ethics and Compliance Officer (CECO) is accountable for overall safeguarding prevention and response. The CECO is accountable for overseeing the Global Safeguarding Prevention Team and the Safeguarding Investigation Team and for ensuring global reporting and investigations are overseen in accordance with this Policy and the Ethics Complaint and Whistleblower Policy and related guidance. The CECO is accountable for ensuring that all safeguarding related reports receive the necessary resources, guidance, and expertise to be thoroughly investigated in a survivor-centered manner. The CECO reports to the Mercy Corps Joint Ethics and Safeguarding Committee and CEO.

MERCY CORPS GLOBAL SAFEGUARDING TEAM

The Senior Director, Safeguarding, reporting to the CECO, is accountable for ensuring this policy and related guidance and training materials remain up-to-date via bi-annual reviews; ensuring this policy remains in alignment with donor expectations and sector best practice and providing any necessary technical support to comply with the minimum standards outlined in this policy. The Senior Director, Safeguarding manages the safeguarding prevention team including the Regional Safeguarding Advisors. The Global Safeguarding Team is responsible for supporting the identification and training of country safeguarding support roles, however those roles report through their respective country leadership structures.

MERCY CORPS SAFEGUARDING INVESTIGATIONS TEAM

The Senior Director, Safeguarding Investigations, reporting to the CECO is responsible for managing safeguarding investigations and ensuring that survivors are supported throughout the investigative process. The Safeguarding Investigations team, consisting of professional investigators trained in trauma-informed and survivor-centered investigative techniques, reports to the Senior Director, Safeguarding Investigations and manages all safeguarding investigations.

THE PEOPLE TEAM

The Chief People Officer and the People Team at the global, regional and country levels are accountable for Standard 2 and ensuring safe recruiting processes are in place and adhered to; including ensuring team members declared ineligible for rehire are not rehired by Mercy Corps and that this status is included in responses to employment verification checks by other organizations.

REGIONAL DIRECTORS

As line management of Country Directors, Regional Directors hold Country Directors accountable to implement the global Safeguarding Core standards and to ensure that adequate goals are set for budgeting, training and staffing. Regional leadership will:

- > Support and collaborate with the Regional Safeguarding Advisor to address gaps in compliance with these standards and identify countries that need additional support, training or resources;
- > Help prioritize the focus of technical support provided by the Global Safeguarding Team to high risk and high priority areas;

CHIEF OPERATING OFFICER

The Chief Operating Officer is line management of regional leadership and therefore is responsible for executive action when needed to ensure a Country or equivalent is in compliance with the global Safeguarding Core standards.

6.2 Mercy Corps country or equivalent

COUNTRY DIRECTORS

The Country Director (CD), or the other most senior member of the Country or equivalent, is ultimately accountable for the Country or equivalent's compliance with this policy. The CD is accountable for creating and maintaining an environment and culture that fosters respect and inclusion and does not tolerate sexual exploitation, or abuse. The CD is responsible for ensuring that Safeguarding is adequately staffed and that Safeguarding operation costs are sufficiently budgeted for in proposals. The CD is also responsible for:

- > Depending on country risk rating and in consultation with the Global Safeguarding Team, appointing a country Safeguarding Focal Point to attend formal Mercy Corps focal point

training, or, in consultation with the Global Safeguarding Team, hiring a full-time safeguarding team member with preexisting safeguarding skills and experience to fulfill focal point duties;

- > Maintaining Safeguarding as a regular agenda item at Senior Management Team meetings;
- > Ensuring team members receive regular, in person safeguarding training;
- > Regularly communicating with team members around the importance of safeguarding;
- > Ensuring that all safeguarding allegations in their country are immediately reported to the Ethics and Compliance Department, are treated with confidentiality and that corrective and disciplinary action is implemented where necessary;
- > Ensuring that anyone who reports allegations or participates in investigations in their country is not retaliated against.

PROGRAM MANAGERS

Program managers are responsible for:

- > Ensuring Safeguarding is budgeted for and operationalized within their program in alignment with this policy, particularly Standard 5;
- > Integrating safeguarding risks and mitigations in program risk assessments and seeking support to do so from safeguarding team members; this includes assigning responsible persons for mitigations

- > Should update safeguarding risks as program objectives or activities change

6.3 LINE MANAGERS AND SUPERVISORS

All Mercy Corps Managers and Supervisors must ensure that Mercy Corps team members reporting to them understand Mercy Corps Safeguarding Policies and sign the Code of Ethics. Managers will ensure performance management of staff includes compliance with this policy and will support an accountable and safe organizational culture to prevent sexual harassment, exploitation and abuse, and child abuse.

6.4 INDIVIDUAL RESPONSIBILITY

All Mercy Corps team members and partners share an obligation to prevent and report safeguarding violations. It is the responsibility of all Mercy Corps team members and partners to uphold Mercy Corps' Safeguarding Policies and Code of Ethics and to treat all other team members, community members and program participants with respect and dignity at all times. All Team Members are responsible for:

- > Reading and understanding all Mercy Corps Safeguarding policies including the Safeguarding Core Standards Policy;
- > Reviewing, understanding and signing the Code of Ethics;
- > Ensuring that they are on-boarded to Safeguarding processes;
- > Sensitizing participants they interact with on their right to be free from exploitation and abuse and on the feedback channels available to them;
- > Immediately reporting any known or suspected safeguarding violations;
- > Reaching out to the Safeguarding team with any questions or for support
- > Collaborating with the HQ Ethics team to assist with country investigations as requested.

7. Policy Governance

Responsible Team	Ethics and Compliance Department
Policy Owner	Senior Director, Safeguarding Prevention
Executive Sponsors	Steve Linick
Policy Approver	Executive Team
Last Reviewed	January 2024
Next Review Date	January 2026