

# Safeguarding Policy



**This policy applies to all Habitat for Humanity International (“HFHI”) entities, including headquarters, area offices, branches and consolidating entities. Legally independent national organizations and affiliates are expected to adopt their own policies that incorporate the provisions of this policy or otherwise ensure that the intent of this policy is covered in the entity’s existing policies. National organizations and branches must complete the attached Acknowledgment Form, which should be sent to the entity’s respective area office finance director.**

In accordance with its foundational mission principles, Habitat for Humanity is committed to the highest ethical standards and opposes all forms of discrimination, exploitation and abuse. Our intent is to create and maintain a work and life environment that is safe, productive and respectful for our colleagues and for all we serve. The purpose of this Safeguarding Policy is to:

- Define safeguarding as “Preventing and responding to harm caused by physical or sexual abuse or exploitation, harassment, or bullying of the people in the communities we serve (especially vulnerable adults and children) and also the people who we work or partner with”;
- Increase understanding of safeguarding risks and define responsibilities for appropriate safeguarding behavior by all HFH representatives, including but not limited to board members, staff members, contractors, interns, AmeriCorps members (including VISTA members), volunteers, implementing partners, and suppliers;
- Confirm our commitment to include safeguarding principles during strategic and project planning, in order to assess and address the potential safeguarding risks associated with Habitat for Humanity’s overall operations and project activities.
- Establish processes for required safeguarding protocols during recruitment and training of HFH representatives;
- Define processes for HFH representatives to report concerns regarding suspected safeguarding misconduct to promote a culture of accountability and transparency;
- Establish standardized processes for investigating and managing reported allegations of safeguarding misconduct; and
- Reinforce Habitat for Humanity’s zero-tolerance culture for any HFH representative who violates safeguarding principles.

## **REMEMBER**

*Safeguarding is preventing and responding to harm caused by physical or sexual abuse or exploitation, harassment, or bullying of the people in the communities we serve (especially vulnerable adults and children) and also the people who we work or partner with*

These ‘safeguarding’ principles (in conjunction with the **HFH Ethics Covenant**, **Whistleblower Policy**, and **Policy on Harassment, Bullying and Discrimination**) guide our work as we strive to do good (and never harm) to each colleague, partner, beneficiary, and community member that we encounter while providing aid or promoting transformational and sustainable community development through shelter.

## (1) Habitat for Humanity's Safeguarding Behavior Commitments

Habitat for Humanity is opposed to any form of discrimination, exploitation and abuse, including slavery, coerced conscription, prostitution, trafficking of persons for any purpose, vulnerable adult or child abuse, and dangerous or exploitative child labor. In the design and implementation of programs and policies, we seek always to work without bias, to do no harm and to reduce (rather than contribute to) the consequences of discrimination, exploitation and abuse.

As described in our **Ethics Covenant**, all HFH representatives commit to respecting and safeguarding the rights and dignities of all people, and protecting our staff members, volunteers, partners, beneficiaries, research participants, and community members (especially vulnerable adults and children) from exploitation and abuse. This includes the following general standards of behavior:

- We will respect, promote and safeguard the rights and dignities of all people (with particular attention to beneficiaries, vulnerable adults and children) without discrimination or bullying of any kind.<sup>1</sup>
- We will treat all intended and actual beneficiaries with respect, courtesy and dignity.
- We will not engage in any form of humiliating, degrading, or exploitative behavior toward beneficiaries in any circumstances.
- We will not engage in any abuse of authority, position or influence by withholding humanitarian assistance or manipulating selection or targeting processes for beneficiaries.
- We will not condone, endorse or participate in any illegal activities conducive to theft, corruption, conflicts of interest, or other activities seeking illegal economic gains.<sup>2</sup>
- We will help to create and maintain an environment that prevents sexual exploitation and abuse, safeguards the rights of beneficiaries, research participants, and community members (especially vulnerable adults and children), and promotes the implementation of Habitat for Humanity's code of conduct. *(Note: Managers at all levels have particular responsibilities to support and develop systems that maintain this environment. A significant failure to support and develop such systems will result in disciplinary consequences, up to and including termination.)*

### REMEMBER

*These standards apply at all times, even when on leave or off duty*

In addition, as an organization, Habitat for Humanity will consider safeguarding principles during strategic and project planning, in order to assess the potential safeguarding risks (especially to vulnerable adults and children) that are associated with our overall operations and project activities. In addition to any specific remediating actions identified after investigation of safeguarding misconduct allegations (discussed in Section (4)), the implementation of safeguarding activities will be assessed throughout the monitoring and evaluation of projects,

HFHI will appoint a **Safeguarding Officer** who, with support from a cross-functional safeguarding team, will be responsible for monitoring the appropriate implementation of Habitat for Humanity's Safeguarding Policy and overall safeguarding framework.

### A. Prevention of Sexual Exploitation and Abuse

Sexual exploitation and abuse (SEA) occurs when people in power exploit or abuse vulnerable populations for sexual purposes. All HFH representatives are prohibited from engaging in sexual exploitation or abuse.

- **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.

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<sup>1</sup> See the HFH Harassment, Bullying and Discrimination Policy for further details.

<sup>2</sup> See the HFH Fraud Policy and Conflict of Interest Policy for further details.

- **Sexual abuse:** Any actual or threatened physical intrusion of a sexual nature, whether by force or under unequal power dynamics or otherwise coercive conditions.

In alignment with the HFH **Ethics Covenant**, all HFH representatives commit to the following safeguarding principles and SEA prevention standards (as established by the United Nations) both at work and away from work:

- We will never engage in sexual exploitation or abuse.
- We will never engage in sexual activity with a child (person under the age of 18) regardless of the age of majority or age of consent locally. Mistaken belief in the age of a child is not a defense.
- We will never exchange money, employment, goods or services (including assistance that is due to beneficiaries) for sex, sexual favors or other forms of humiliating, degrading or exploitative behavior.
- We will not engage in a sexual relationship with a beneficiary, since it is based on inherently unequal power dynamics and undermines the credibility and integrity of Habitat for Humanity's charitable mission.

**REMEMBER**

*HFH representatives commit to never engage in sexual exploitation or abuse.*

Such activities constitute gross misconduct and are grounds for termination of the individual's employment or relationship with Habitat for Humanity. In addition, Habitat for Humanity will actively support the prosecution of individuals in cases of proven misconduct.

**B. Child Protection**

Habitat for Humanity believes that all children, in all circumstances, have the right to feel and be safe and to live free from harm, exploitation and abuse. Habitat for Humanity strives to be a child-safe organization and to reduce the risk of child abuse in all aspects of our operations.

**REMEMBER**

*A child is anyone who is not yet 18 years old.*

1. **Prevention of child abuse, exploitation or neglect:** All HFH representatives are prohibited from engaging in child abuse, exploitation, or neglect.

- **Physical Abuse:** Physical abuse occurs when a person purposefully injures or threatens to injure a child or young person (such as by punching, kicking, burning, etc.). Physical injury may take the form of bruises, cuts, burns or fractures. It is not always the case that the physical injuries will be visible.
- **Emotional Abuse:** Emotional abuse occurs when persistent ill treatment on a child affects their self-esteem. This may include name-calling, rejection, threatening, intimidating or any other acts, which can affect the child's physical and emotional growth, and self-esteem.
- **Sexual Abuse:** Sexual abuse occurs when there has been any (or likely) sexual exploitation of a child by an adult. Sexual abuse includes any actual, attempted or threatened sexual activity involving children (such as intercourse, fondling, oral sex, indecent exposure, exposing the child to pornography, etc.).
- **Commercial Sexual Exploitation of Children (CSEC):** CSEC occurs when a child is sexually abused or exploited in return for cash or any other goods or services. Examples of CSEC include children in prostitution, children involved as subjects in child pornography and child sex tourism.
- **Neglect:** Neglect occurs when a child's basic needs have consistently not been met to the extent that it has a detrimental effect on the child's health and personal development. These basic needs include food, clothing, shelter and supervision.

Such activities constitute gross misconduct and are grounds for termination of the individual's employment or relationship with Habitat for Humanity. In addition, a significant failure to report suspicions that such activities may be occurring by another HFH representative will not be tolerated and can result in disciplinary consequences, up to and including termination (as discussed in Section (2)). Furthermore, Habitat for Humanity will actively support the prosecution of individuals in cases of proven misconduct.

2. **Proactive child protection:** Habitat for Humanity will design its programs and execute its mission in alignment with the following standards:

- We will keep the health and safety of children paramount at all times.
- We will consider child safeguarding in project planning and implementation to determine potential risks to children that are associated with project activities and operations.
- We will work to ensure that personal dignity and respect for children is maintained through all projects, programs and departments.
- We will apply measures to reduce the risk of child abuse, exploitation, or neglect, including, but not limited to:
  - Limiting unsupervised interactions with children;
  - Prohibiting exposure to pornography; and
  - Complying with Habitat for Humanity data responsibility standards, as well as applicable laws, regulations, or customs regarding the photographing, filming, or other image-generating activities of children.
- We will ensure compliance with local child welfare and protection legislation or international standards (whichever gives greater protection) and with U.S. law where applicable.

### C. Prohibition of Prostitution, Trafficking and Forced Labor

1. **Prostitution:** Habitat for Humanity expressly prohibits sex trafficking and the procurement of commercial sex acts by any HFH representative. We will never exchange money, employment, goods or services (including assistance that is due to beneficiaries) for sex, sexual favors or other forms of humiliating, degrading or exploitative behavior. These standards apply at all times (including when on leave or off duty) and even when commercial sex acts are legal in the local context.
2. **Pornography:** Habitat for Humanity expressly prohibits all HFH representatives from accessing, possessing, or circulating pornographic content using HFH computers, HFH email accounts, HFH-related electronic distribution lists, or an internet connection paid for by Habitat for Humanity. This includes sharing of emails or group texts (including jokes) containing explicit images with HFH colleagues, and these standards apply at all times, even when on leave or off duty. Such actions violate Habitat for Humanity's commitment to create and maintain an environment that prevents harassment and sexual exploitation or abuse, and therefore will result in disciplinary consequences, up to and including termination, against the individuals involved.
3. **Human Trafficking and Forced Labor:** Habitat for Humanity expressly prohibits human trafficking (sometimes referred to as "modern slavery") and the use of forced labor by any HFH representative. As a result, Habitat for Humanity will never:
  - Destroy, confiscate, or otherwise deny a staff access to their identity or immigration documents;
  - Fail to offer transportation for a staff to return to their home country where appropriate (such as when they were recruited by Habitat for Humanity to work outside of their home country and where return transportation was agreed in their benefits or contract);
  - Solicit a person for employment using materially false or fraudulent pretenses, representations, or promises regarding that employment;
  - Charge staff recruitment fees; or
  - Provide or arrange housing for a staff that fails to meet reasonable local housing and safety standards.
4. **Dangerous or Exploitative Child Labor:** While Habitat for Humanity actively welcomes volunteers, all HFH organizations must have standards to safeguard the labor provided by children. These standards are designed not only to prevent the economic exploitation of children, but also to protect their health, safety and morals.

At minimum, HFHI requires affiliates, national organizations, implementing partners and suppliers to comply with the child labor standards consistent with United Nations requirements, such as those detailed in Appendix C. In many countries, Habitat for Humanity organizations must also comply with the more stringent child labor standards established by their local jurisdiction (e.g. the Occupational Safety and Health Administration in the United States).

Parental or guardian permission is required for any child under the age of legal majority (usually 18 or 19) to work at a Habitat for Humanity job site.

## (2) Habitat for Humanity's Required Reporting Protocols for Potential Safeguarding Misconduct

### A. Expectations for reporting

All HFH representatives (especially managers) have a responsibility to report potential safeguarding misconduct.

- (1) HFH representatives are expected to be able to recognize and be alert for the signs of potential safeguarding misconduct, such as abuse, exploitation or neglect.
- (2) Habitat for Humanity's **Whistleblower Policy** expressly prohibits retaliation and protects individuals – including their anonymity and safety – who share good faith concerns of misconduct from retaliation or any threat of retaliation by any other HFH representative. Any person who engages in retaliation will be subject to discipline, up to and including termination of employment. (*Note: Intentional submission of false allegations is a fraudulent activity and will be handled in accordance with Habitat for Humanity's policies.*)
- (3) Significant failure to make a timely report of potential safeguarding misconduct (especially by managers) will be subject to discipline, up to and including termination of employment.

### B. Protocols for reporting

Any HFH representative who receives a safeguarding complaint or who has knowledge or reasonable suspicion of safeguarding misconduct (whether by a HFH representative or another aid worker) must:

- (1) **Immediately:** Notify his or her direct supervisor via established reporting protocols. If the individual has reason to believe that his or her direct supervisor may be involved in the misconduct (or feels significantly uncomfortable raising such concerns to his or her supervisor), he or she must immediately notify:
  - A higher level supervisor in his or her reporting line; or
  - The **HFHI Safeguarding Officer, the HFHI Internal Audit department, or use the MySafeWorkplace reporting tool.**
- (2) **Within 48 hours:** Also ensure that the concerns of safeguarding misconduct are entered into the **MySafeWorkplace reporting tool**, Habitat for Humanity's confidential, anonymous reporting hotline and central tracking repository for allegations of serious misconduct.
- (3) Due to the sensitivity of such situations, the individual who receives a safeguarding complaint **SHOULD NOT START ANY INVESTIGATIONS** (including gathering preliminary evidence or questioning the survivor, the accused or any potential witnesses after the initial complaint is received), but rather report the concerns to the **MySafeWorkplace reporting tool** and coordinate any follow-up actions with the HFHI Safeguarding Investigation Committee using the protocols in Section (4) below.

#### REMEMBER

*If you see something, say something.*

*Note: These reporting protocols do not replace, but instead supplement, the local reporting community-based feedback mechanisms (such as a dedicated local complaint email address, a local hotline, a community suggestion or complaint box, etc.) that each Habitat for Humanity organization must also have implemented to receive such concerns directly from beneficiaries and other external stakeholders. All safeguarding complaints*

*raised through community-based feedback mechanisms must be added to MySafeWorkplace within 48 hours as discussed in Section (2)B(2) above.*

### **(3) Protocols for Survivor Assistance**

Habitat for Humanity's support to alleged victims of safeguarding misconduct (or survivors) will be provided regardless of the status or outcome of an investigation. Furthermore, the HFH **Whistleblower Policy** expressly prohibits retaliation and protects individuals who share good faith concerns of misconduct from retaliation or any threat of retaliation by any other HFH representative. Upon receipt of an allegation of safeguarding misconduct, Habitat for Humanity will consider providing any or all of the following forms of survivor assistance, as appropriate depending on the nature of the allegations, the circumstances involved, and the informed consent of the survivor:

- A. Immediate material care:** Direct and/or funding support to provide for temporary needs such as trauma-informed medical care, food, clothing, or emergency and safe shelter as necessary.
- B. Psychosocial support:** Referrals and funding support to obtain appropriate psychosocial services through a local counseling organization. For example, HFHI's staff have access to such counseling through HFHI's global Employee Assistance Program. Comparable services or alternative culturally sensitive psychosocial support will be made available to survivors through appropriate local service providers.
- C. Legal and advocacy support:** Support to obtain victim advocacy services or legal counseling in order to make an informed decision about whether to pursue legal recourse. *(Note: Habitat for Humanity's legal counsel will not directly represent a survivor, as such an activity would pose an inherent conflict of interest.)*

In considering any of the above forms of support, Habitat for Humanity will consult with both the survivor and with appropriate local specialists. All decisions related to survivor assistance will be documented.

### **(4) Investigation Protocols**

Above all else, Habitat for Humanity's investigation protocols for potential safeguarding misconduct will be focused on keeping the survivor safe, minimizing harm, and conducting a thorough, impartial investigation. Safeguarding investigations will be performed only by qualified individuals who are:

- Independent from the allegations received;
- Free from the appearance or existence of bias; and
- Specifically trained in appropriate safeguarding investigation procedures.

To ensure all safeguarding investigations are handled with appropriate due diligence and professional care, HFHI has established a Safeguarding Investigation Committee to oversee all such investigations comprised of key stakeholders, including individuals who have been specifically trained in SEA investigation protocols. The basic processes that must occur during a safeguarding investigation include the following items. Further details of the role of the Safeguarding Investigation Committee and Habitat for Humanity's expected processes when conducting appropriate safeguarding investigations are available in the HFH Investigation Policy.

- A. Complaint assessment:** Upon receiving an allegation, the Safeguarding Investigation Committee (in consultation with management of the relevant Habitat for Humanity organization, where appropriate) will assess the appropriateness of an investigation based on the severity and information provided. In considering this response, Habitat for Humanity will assess factors such as: whether there is an allegation of a criminal offense, the immediate safety concerns of the survivor and other individuals involved, and risks such as loss of evidence and damage of property.

As there may be circumstances where the performance of an investigation would increase the harm to the survivor, any such actions will be taken only after full consideration of the safety and the informed consent of

the survivor, as well as Habitat for Humanity's overall duty of care to the community. The basis for all decisions related to investigation performance or non-performance will be documented.

**B. Investigation process:** After assessment of the allegations, as well as the needs and preferences of the survivor, reports of safeguarding misconduct will be either:

- (1) Investigated promptly by, or under the supervision of, HFHI Internal Audit, HFHI Human Resources, and/or the HFHI Legal department in the manner established by the HFH Investigation Policy and processes. Where appropriate during the investigation, Habitat for Humanity will consult with both the survivor and with appropriate local specialists, especially related to ensuring the safety of the survivor during and after the investigation process.
- (2) Referred to the appropriate local governmental authority for investigation or inquiry regarding the potential misconduct or violations of law.

While an investigation is going on and after an investigation, Habitat for Humanity will take appropriate steps to ensure that the survivor is provided with an environment free of exploitation, abuse, harassment or bullying. This may include reassignment of the subject of a complaint to a comparable work assignment on a temporary or permanent basis.

**C. Confidentiality:** All investigations will be performed in a manner designed to protect confidentiality and will not be disclosed or discussed with anyone other than those who have a legitimate need to know the details of the case.

**D. Documentation:** Where the investigation is performed by HFH investigators, all investigation procedures, findings and recommendations will be thoroughly documented in accordance with Habitat for Humanity's policies.

- (1) Documentation of investigation procedures will be retained in a central repository for each Habitat organization and in alignment with the HFH Record Retention Policy. To protect confidentiality, access to the information will be restricted as discussed above.
- (2) A written report or memo summarizing the investigation findings and recommendations will be prepared and provided to management for their use in initiating any appropriate remediating actions. Investigation recommendations will specifically include, but are not limited to, any recommendations related to necessary discipline of HFH representatives, any potential requirements to report findings to local authorities, and necessary improvements to any processes or controls to prevent or reduce future occurrences of the safeguarding misconduct.
- (3) Within 48 hours after the investigation finalization, a copy of the report should be uploaded to the case previously created to track the incident in Habitat for Humanity's **MySafeWorkplace reporting tool**.

**E. Communications with the survivor:** Habitat for Humanity will provide the survivor with periodic updates on the status of the investigation. In addition, Habitat for Humanity will provide the survivor with a summary of the investigation findings when the investigation is completed.

**F. Management remediating actions:** Upon receipt of the investigation report or memo, management will promptly initiate any necessary remediating actions related to investigation findings, including but not limited to:

- (1) **Internal disciplinary procedures:** If the investigation confirms the allegations of safeguarding misconduct, Habitat for Humanity will discipline the person who engaged in the safeguarding violation in accordance with the organization's normal disciplinary procedures. For staff members, disciplinary actions will be based upon the seriousness of the offense and could range from a written warning to termination of employment. For other HFH representatives (donors, board members, volunteers,

- implementing partners, suppliers, etc.), the disciplinary actions will also depend on the seriousness of the offense and may result in the termination of their relationship with Habitat for Humanity.
- (2) **Pursuing legal recourse:** In addition to internal discipline, if the investigation confirms the allegations of safeguarding misconduct, Habitat for Humanity is committed to supporting and/or pursuing appropriate legal recourse in instances where a crime may have been committed. Since local laws vary on the definitions and illegality of certain behaviors (e.g. abuse, harassment, prostitution, adultery, etc.), Habitat for Humanity will consult with both the survivor and with appropriate local legal counsel, in considering whether to pursue legal recourse. The basis for all such decisions will be documented.
  - (3) **Other internal remediating activities:** Habitat for Humanity's senior management (and Board where applicable) will be responsible for ensuring Habitat for Humanity promptly implements all necessary improvements to any processes or controls to prevent or reduce future occurrences of the safeguarding misconduct.

## (5) Reporting of Safeguarding Incidents

Habitat for Humanity is a global network and no incident happens in isolation. To increase awareness of risks and decrease the possibility of such incidents, Habitat for Humanity is committed to ensuring consistent, transparent reporting of confirmed safeguarding misconduct within the following parameters:

- A. Where required by local authorities:** Habitat for Humanity will comply with all relevant requirements related to mandatory reporting of alleged or confirmed safeguarding misconduct to local authorities. Each Habitat for Humanity organization is responsible for knowing the mandatory reporting requirements in its local jurisdiction. Examples may include instances where exploitative or abusive behavior involves a child.

All such reporting will occur after a joint consultation between the local Habitat for Humanity entity, the local legal counsel, and HFHI's key safeguarding stakeholders (e.g. the HFHI Legal, Human Resources, and/or Internal Audit departments).

- B. Where required or appropriate due to a contractual, legal or other donor obligation:** There are circumstances where it is required or appropriate for Habitat for Humanity to report alleged or confirmed safeguarding misconduct to external parties such as donors, regulators, or other governing bodies. Decisions related to "whether and what" to report externally under such circumstances will be guided by:
  - (1) Any requirements defined in Habitat for Humanity's contractual commitments to external parties (e.g. reporting requirements based on a grant agreement, etc.); and
  - (2) Any requirements for mandatory reporting of "serious incidents" that are established by charity watchdogs or other governing bodies in the relevant jurisdiction, such as required by the UK Charities Commission and other comparable organizations.
- C. As appropriate in order to raise awareness and demonstrate public accountability:** Habitat for Humanity's approach for voluntary sharing of information related to safeguarding misconduct allegations and investigations is guided by the parallel philosophies of transparency (to donors, regulators and the public) and confidentiality (for the protection of survivors).
  - (1) Habitat for Humanity may choose to report certain issues to donors or governing bodies where no clear contractual or legal requirement exists but where Habitat for Humanity determines the disclosure to be in the best interest of the public trust.
  - (2) Habitat for Humanity will ensure that the HFHI Board of Directors receives regular updates on safeguarding allegations and investigations to facilitate effective process oversight.
  - (3) At least annually, Habitat for Humanity will make available to the general public high-level information on safeguarding trends to increase awareness and public transparency.



Wherever possible, information will be presented in a way that protects the survivor's anonymity for confidentiality and safety reasons (except where relevant law might require disclosure).

## **(6) Safeguarding Protocols during Recruitment**

To uphold the principles of Safeguarding and Beneficiary and Child Protection, the following steps will be taken during Habitat for Humanity's recruitment processes, particularly for HFH representatives whose work brings them in direct contact with beneficiaries and/ or children:

### **A. Interview and selection process**

Job descriptions will contain reference to the HFH **Ethics Covenant** and Habitat for Humanity's expectations for ethical behavior (including safeguarding). Applicants are notified about required background and reference checks during selection processes. For positions that involve direct contact with beneficiaries, children or child related-projects, any gaps in employment history will be clarified and specific questions about safeguarding (e.g. child safety, situations working directly with beneficiaries or children) may be asked as part of the interview process.

### **B. Criminal background checks**

In alignment with the HFH Background Screening Policy, background checks are undertaken for all staff and certain other HFH representatives, such as those who are in direct contact with beneficiaries or children. Habitat for Humanity reserves the right to not hire staff (or engage with volunteers or contractors) with a prior conviction or misdemeanor directly or indirectly related to sexual assault or beneficiary or child abuse.

### **C. Reference checks**

All potential full-time staff undergo at least two comprehensive reference and character checks prior to being offered any position. Such checks are to be documented and filed accordingly. For full-time staff positions that involve direct contact with beneficiaries, children or child-related projects, specific questions regarding the applicant's suitability to work directly with beneficiaries or children may be asked as part of verbal reference and character checks.

Habitat for Humanity may expand the scope of individuals who receive background screening (as described above) based on additional risk factors or donor requirements in order to meet the intent of these safeguarding principles.

## **(7) Safeguarding training**

### **A. Onboarding**

At the time of onboarding, all HFH Board members, staff, contractors, and implementing partners will be required to read and acknowledge the HFH **Ethics Covenant** and Safeguarding Policy. In addition, all HFH staff will complete training related to ethics, safeguarding principles and appropriate behavior for HFH representatives.

### **B. Periodic training**

Refresher and supplementary training will be provided on a periodic basis through Habitat for Humanity's standard methods for training and behavior reinforcement, such as staff meetings, in-person training sessions and online training. In addition, for positions that involve direct contact with beneficiaries, children or child related-projects, additional in-depth training may be required. *(Note: As part of their responsibilities for creating and maintaining a safeguarding environment, managers are responsible for ensuring that the staff reporting to them complete all required training.)*

**(8) Additional Resources**

This policy is intended to supplement and provide further context to the HFH **Ethics Covenant** and policies such as:

- HFHI's Employee Handbook
- Policy on Harassment, Bullying and Discrimination
- Whistleblower Policy
- Fraud Policy
- Volunteer Code of Conduct
- Background Screening Policy
- Gift Acceptance Policy and Procedures
- US Policy Handbook

It does not supersede or replace these documents, or other relevant HFHI resources or guidance documents (such as the **MySafeWorkplace reporting tool** and the **Community Based Feedback Mechanisms** guidance).

## Appendix A: Individual Acknowledgment

This Safeguarding Policy describes Habitat for Humanity's commitment to oppose all forms of discrimination, exploitation and abuse (especially of beneficiaries, vulnerable adults and children). I acknowledge that I have read and reviewed the requirements contained in the policy and agree that I will follow them.

I further commit to report any suspected safeguarding misconduct and to help to create and maintain an environment that prevents sexual exploitation and abuse, safeguards the rights of beneficiaries, research participants, and community members (especially vulnerable adults and children), and promotes the implementation of Habitat for Humanity's Ethics Covenant and Code of Conduct. *(Note: Managers at all levels have particular responsibilities to support and develop systems that maintain this environment.)*

I understand that I should consult with the HFHI Safeguarding Officer, Human Resources department, the Legal department or the Internal Audit department regarding any questions not answered in this policy.

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SIGNATURE

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DATE RECEIVED

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NAME (TYPED OR PRINTED)

## Appendix B: Policy Acknowledgment Form for National Organizations: Safeguarding Policy

Entity name: \_\_\_\_\_

Country: \_\_\_\_\_

### INSTRUCTIONS

1. The policy acknowledgement form must be read and signed by the entity's CEO, CFO or designee. If the entity is able to comply with or meet the intent of the policy, then a copy of the policy acknowledgment form must be forwarded to the appropriate area office. The entity should maintain the original form for documentation purposes.
2. If the entity is not able to comply with or meet the intent of the policy, an exception must be requested. The exception request must be documented below and include: a) the section of the policy for which the exception is being requested; b) references to any local laws or business justifications; and c) the proposed alternative. The original of the policy acknowledgment form must be sent to the appropriate area office for review and agreement. The area office will send the original form to HFHI Internal Audit and Legal departments for final approval. The completed/approved form will be returned to the appropriate area office and the originating entity, HFHI Internal Audit, HFHI Legal department, and the area office. The entity must keep copies of the approved exception.

I hereby certify that I have read the attached policy and therefore:

- I acknowledge and confirm that the attached policy has been adopted in substance by this organization.
- I acknowledge and confirm that the attached policy has been adopted in substance by this organization, except for the specific paragraph(s) noted below.

### Entity acknowledgment:

\_\_\_\_\_

Entity CEO (Print Name)    Entity CFO (Print Name)

\_\_\_\_\_

Entity CEO (Signature)

Entity CFO (Signature)

\_\_\_\_\_

Date

Date

**For exceptions:** Note policy section number and text for which the exception is being requested, justification for the exception, and proposed alternative:

<b>Name (print or type):</b>		<b>Department:</b>
<b>Signature:</b>	<b>Full phone number:</b>	<b>Date:</b>
<b>Recommend approval:</b> (area office officials must ensure sufficient detail is provided by the national office to support recommendation)		

### HFHI Legal department approval:

<b>Name (print or type):</b>		<b>Department:</b>
<b>Signature:</b>	<b>Full phone number:</b>	<b>Date:</b>

## Appendix C: Minimum Habitat for Humanity Child Labor Requirements

Based on United Nations guidance, the standards below are designed not only to prevent the economic exploitation of children, but also to protect their health, safety and morals. While these standards primarily discuss work on the jobsite, MyHabitat has additional resources addressing how to engage appropriately and safely with children in other areas of the Habitat for Humanity mission:

- [Youth Involvement with Habitat for Humanity Worksites and Neighborhood Revitalization Initiative Activities \(US resource\)](#)
- [Practical guidance for engaging youth volunteers on build sites and in ReStores \(US resource\)](#)

### **Dangerous work - Minimum age: 18 years**

Would include working from a height of greater than six feet or 180 cm, roofing, using power tools or electrically or gas powered equipment, the use of powder actuated tools, demolition or excavation.

### **General work - Minimum age: 15 years**

Would include all other construction work, not considered light work or dangerous work, including carpentry, siding, plastering, flooring, laying foundations, masonry work, brick making, and finishing work. The use of hand tools would be part of general construction work.

### **Light work - Minimum age: 13 years**

Does not include general construction, or working on a site where general construction is taking place. Would include lot clearing, meal preparation, painting, landscaping, transporting supplies (weight limit appropriate to the child's capacity and not more than 5 – 7 kilos), babysitting, and other similar work. It would also include any other activities (i) which are not likely to be harmful to the health or development of children and (ii) which is not such as to prejudice their attendance at school or their capacity to benefit from the instruction received. It should include:

- simple and well-defined tasks;
- lack of physical or mental effort that could endanger the child's health or development;
- the limited number of daily and weekly hours of work;
- regular breaks and weekly rest of at least 48 hours;
- no night work.

In situations where homeowner children under the age of 13 accompany their parent or guardian to the job site, these children should do no work or, where unavoidable, only the lightest assistance of volunteer support (such as offering refreshments) or site preparation (such as picking up trash) under parental/guardian supervision.

Affiliate and national organizations should work with relevant subject matter experts in their area to develop alternative ways for children of homeowners to assist their families to complete sweat equity hours or to engage children from the community in the Habitat for Humanity mission.

### **REMEMBER**

*These are Habitat's minimum child labor requirements. Child labor standards may be more restrictive in your local jurisdiction. Consult My.Habitat resources and your local Legal department contact for more details.*

## Appendix D: Form summarizing type of info that should be submitted to MSWP re safeguarding or other misconduct

1. **Date of this report**
2. **Country**
3. **City/Province**
4. **Date concern was identified or date and time of incident**
5. **Specific location of concern/ incident**
6. **Person(s) involved**

	Person's Name	Job Title or Relationship to HFH
1		
2		
3		

7. **Description of concern/ incident**
  
8. **Other witnesses (especially HFH staff) involved**

	Person's Name	Job Title or Relationship to HFH
1		
2		
3		

9. **Was the incident the first of its kind? If not, indicate approximate dates of previous incidents/report.**
  
10. **What HFH programs, grants, partners or donors may be impacted by this report?**
  
11. **Name and title of person preparing this report (printed):**
  
12. **Relationship of the person preparing this report to the person involved in this incident:**
  
13. **Signature of person preparing this report:**

**NOTE:** Forward a copy of this report to:

- mysafeworkplace@habitat.org
- Your designated HFH Human Resources contact
- The HFHI Safeguarding Officer

## Appendix E: Key Terms

Term	Definition
<b>HFH Representative</b>	An individual acting on behalf of Habitat for Humanity, including but not limited to board members, staff members, contractors, interns, AmeriCorps members (including VISTA members), volunteers, implementing partners, and suppliers
<b>Target Populations</b>	Individuals or groups that the humanitarian activities of the respective disaster response program or humanitarian operations are intended to serve.
<b>Beneficiary</b>	An individual who applies to receive or who receives from HFH (or its staff and volunteers) shelter assistance or another form of protection, service, or other intervention.
<b>Child</b>	A child or children are defined as persons who have not attained 18 years of age.
<b>Vulnerable Adult</b>	A person over the age of 18 with a physical, mental or life status that causes particular vulnerability (such as a physical or mental disability).
<b>Harassment</b>	Any comment or behavior that is offensive, demeaning, humiliating, derogatory, or is otherwise inappropriate or fails to respect the dignity of an individual. It can be committed by or against a beneficiary, partner, staff, official, or any other person involved in any way in the disaster response program or humanitarian operation.
<b>Human Rights</b>	International standards that recognize and protect the dignity and integrity of every individual without distinction.
<b>Sexual Abuse</b>	Any actual or threatened physical intrusion of a sexual nature (including inappropriate touching), whether by force or under unequal power dynamics or otherwise coercive conditions.
<b>Sexual Exploitation</b>	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.
<b>Sexual Harassment</b>	Any unwelcome sexual advance, comment, expressed or implied sexual demand, touch, joke, gesture, or any other communication or conduct of a sexual nature (whether verbal, written or visual) that occurs between a HFH staff member and any any person whom they interact in their HFH role. For further details, see the HFH Policy on Harassment, Bullying and Discrimination.
<b>Child Abuse, Exploitation, or Neglect</b>	Constitutes any form of physical abuse; emotional ill-treatment; sexual abuse; neglect or insufficient supervision; trafficking; or commercial, transactional, labor, or other exploitation resulting in actual or potential harm to the child's health, well-being, survival, development, or dignity. It includes, but is not limited to any act or failure to act which results in death, serious physical or emotional harm to a child, or an act or failure to act which presents an imminent risk of serious harm to a child.
<b>Child Labor</b>	Exploitive work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It refers to work that is mentally, physically, socially or morally dangerous and harmful to children; and interferes with their schooling.
<b>Child Emotional Abuse</b>	Constitutes injury to the psychological capacity or emotional stability of the child caused by acts, threats of acts, or coercive tactics. Emotional abuse may include, but is not limited to Humiliation, control, isolation, withholding of information, or any other deliberate activity that makes the child feel diminished or embarrassed.
<b>Exploitation</b>	Constitutes the abuse of a child where some form of remuneration is involved or whereby the perpetrators benefit in some manner. Exploitation represents a form of coercion and violence that is detrimental to the child's physical or mental health, development, education, or well-being.
<b>Child Neglect</b>	Constitutes failure to provide for a child's basic needs.
<b>Child Physical Abuse</b>	Constitutes acts or failures to act resulting in injury (not necessarily visible), unnecessary or unjustified pain or suffering without causing injury, harm or risk of harm to a child's health or welfare, or death. Such acts may include, but are not limited to, punching, beating, kicking, biting, throwing, stabbing, choking, or burning. These acts are considered abuse regardless of whether they were intended to hurt the child.
<b>Child Sexual Abuse</b>	Any form of sexual abuse (discussed above), indecent exposure, or exploitation through prostitution or the production of pornographic materials, which involves a child.

## Appendix F: Change history

Date	Modification	Approved by
Approved: June 21, 2019  Effective: July 1, 2019	New policy combining and replacing existing: <ul style="list-style-type: none"> <li>- Policy on the Prohibition of the Promotion or Advocacy of the Legalization or Practice of Prostitution or Sex Trafficking (October 2005)</li> <li>- Policy of Protection from Sexual Exploitation and Abuse in Humanitarian Crises (June 2005)</li> <li>- HFHI Child Labor Policy (2005)</li> </ul>	Jonathan Reckford – Chief Executive Officer Valerie Norton – Chief People Officer Hilary Harp – SVP Legal and General Counsel Juan Montalvo – VP of Internal Audit  IBOD