



Safeguarding at FHI 360

FY23 Annual Incident Report

(OCTOBER 1, 2022 – SEPTEMBER 30, 2023)

This report provides an overview of our prevention, risk mitigation, and response efforts related to harassment, sexual exploitation, and other abuse that may occur as a result of a person's engagement with FHI 360 or supported programs. It also includes aggregate information about incidents, including the number and types of reports (complaints), investigations and outcomes.

Our safeguarding commitments

As a global organization working in more than 60 countries around the world, FHI 360 is fully committed to ensuring that everyone who engages with our organization and programs is safe from harm — including sexual harassment, exploitation and other abuse — that may happen as a result of their engagement with our organization or programs.

Almost everywhere we work, our teams and partners are witnessing sharp increases in displacement, impoverishment and competition for increasingly scarce resources. In times of crisis — due to strained infrastructures, limited resources and diminished systems to protect vulnerable populations — there is an increased risk of harm to individuals in the communities where we work, including harassment, sexual exploitation and abuse toward personnel and program participants.

We have a moral and ethical obligation to ensure these types of harms do not occur at FHI 360 or within any FHI 360-supported project.

Given the diverse portfolio of projects at FHI 360 — including projects involving populations that are vulnerable to sexual exploitation and abuse in both humanitarian and development settings — it is imperative that we have in place and continuously improve methods to prevent harm, mitigate risks and respond quickly and effectively if harm does occur.

We have made good progress, but there is more to do. It starts with our leadership teams.

Our efforts to prevent harm toward everyone who engages with our organization and programs must go beyond legal- or compliance-focused activities. We need to pay attention to our organizational culture, and the tone is set at the top. Everyone who works with FHI 360, including our implementing partners, must maintain safety and respect in our work environments and programs. But FHI 360 leadership teams have a unique role in promoting and maintaining a safe and positive organizational culture of transparency, equity and inclusion that supports our safeguarding efforts.

FHI 360's Safeguarding Committee consists of executive team members, including our chief executive officer, chief operating officer, chief people officer, chief compliance officer and general counsel. The committee is supported by our director of safeguarding and program support and meets regularly to provide oversight and leadership around FHI 360's prevention, risk mitigation, and response strategies related to safeguarding.

Our safeguarding approach

Safeguarding encompasses the systems and practices of preventing harm to people — especially children, young people and vulnerable adults — while conducting development work and providing humanitarian assistance. At FHI 360, safeguarding includes:

- Designing and delivering **safe programs** that do not put program participants or personnel at risk of being harmed.
- Protecting our **staff** from any type of harm, including sexual abuse, exploitation and harassment.
- Protecting program **participants** from any type of harm that may happen during and/or because of their engagement with our organization or programs, including sexual exploitation and abuse, child abuse, and human trafficking committed by our own personnel or partner personnel.

FHI 360's **minimum standards**, which are required actions for safeguarding program participants, are organized under eight domains (see graphic) and align with our policies, international standards, **InterAction's CEO Pledge** (which FHI 360 has signed), and major funder requirements. When effectively and fully implemented, the minimum standards mitigate risks of harm and help us respond effectively if harm does occur.



“PSEA” refers to preventing sexual exploitation and abuse.

FHI 360's Safeguarding and Program Support Department includes dedicated staff who support project teams, including over 200 project-level safeguarding focal points, to integrate these standards across the organization and ensure the uniform application of [FHI 360's safeguarding policies](#).

We also support implementing partners to strengthen their own organizational capacity by providing technical assistance and sharing safeguarding-related resources, including policy templates, standards, tools (for example, a risk assessment tool), guidelines, training modules, and awareness-raising materials.

To further strengthen our recruitment and hiring practices, FHI 360 joined a growing number of organizations in the development sector as a member of the [Misconduct Disclosure Scheme](#) (MDS). The goal of the MDS is to stop perpetrators of sexual misconduct from moving undetected between organizations. It provides a channel for humanitarian and development organizations to request and share information about employment candidates to determine whether they have substantiated histories of sexual misconduct with prior organizations. This information enables organizations to make informed recruiting and hiring decisions and protect others from potential harm.

Our 24-hour ethics and compliance hotline is accessible worldwide and managed by an independent third-party provider. It can be used to report harms and other concerns at any time, and reporters can choose to be anonymous if they wish. You can access the hotline [here](#). Our country offices and project teams also establish project-level reporting mechanisms, where needed, to ensure program participants have safe, accessible and trusted ways to report harm.

We have systems in place to respond quickly if harm does occur. This includes ensuring that victims and survivors have access to information and resources — such as referrals to medical care, psychosocial support, and legal assistance — as appropriate and according to individuals' wants and needs. FHI 360 does not tolerate any form of retaliation against anyone who reports suspected or known harm and takes appropriate action if any individuals engage in retaliatory actions. We also have dedicated investigators who are trained in conducting safeguarding-related investigations and using a survivor-centered approach to follow up on all complaints to ensure effective and timely investigations.

Summary of FY23 incidents

During FY23, FHI 360 received 25 reports that involved safeguarding-related allegations, including harassment, exploitation or other abuse toward or committed by FHI 360 personnel,¹ supplier personnel,² program participants³ or others engaged with our organization. All 25 reports were determined to be potential violations of FHI 360's safeguarding policies and were fully investigated. Of these:

- **Sixteen reports involved allegations of harassment, including sexual harassment, or other abuse by personnel toward other personnel.**

- Seven reports were substantiated as policy violations. In these cases, the harm was committed by six FHI 360 personnel and one partner/supplier personnel or others working on behalf of FHI 360.
- Of the seven substantiated reports, six resulted in termination of employment and one resulted in a verbal warning and coaching.
- Seven reports were not substantiated due to insufficient evidence.
- Two reports were still open and under investigation at the end of FY23.

- **Nine reports involved allegations of sexual exploitation and abuse (SEA) toward program participants by FHI 360 personnel or supplier personnel.**

- All nine reports included harm toward adults⁴ (people 18 years old or above) and were reported to the appropriate authorities per FHI 360 policies and funder requirements.
- Four reports were substantiated as policy violations. In these cases, the harm was committed by four partner/supplier personnel.
- Of the four substantiated reports, three resulted in termination of employment by the partner/supplier and one resulted in termination of the partner/supplier contract by FHI 360.
- Five reports were not substantiated due to insufficient evidence.
- Of the five reports with insufficient evidence to support a policy violation, two resulted in counseling to the personnel involved and one resulted in a written warning and transfer of the personnel by the partner/supplier.

¹ FHI 360 personnel are defined as FHI 360 employees, officers, members of the board of directors, interns, fellows (paid or unpaid), volunteers, agents, and other individuals authorized to act on behalf of FHI 360.

² Suppliers are defined as any FHI 360 contractor, consultant, vendor, service provider, subcontractor, or subrecipient and their personnel, including employees, interns, fellows, volunteers, agents, and other individuals authorized to act on a supplier's behalf.

³ A program participant is defined as any person who is served by an FHI 360 program or has contact with FHI 360 personnel, suppliers, or supplier personnel in connection with or as a result of FHI 360's programs or business activities.

⁴ For any cases involving harm against a child, FHI 360 complies fully with host country and local child welfare and protection laws or with international standards, whichever gives greater protection. We take remedial action, including but not limited to, notifying law enforcement, and cooperating with criminal investigation and prosecution where appropriate.

There are many barriers that prevent people from reporting harm, such as lack of trust in, access to or knowledge of reporting mechanisms, shame or embarrassment, and fear of retaliation. Removing barriers to reporting continues to be a priority across the international development sector, including at FHI 360. To help reduce these barriers, we will continue to:

- Foster a culture that encourages reporting and where these types of harms are not tolerated.
- Ensure our reporting mechanisms are accessible and well-known among all personnel, partners, and program participants.
- Increase awareness about our policies, including prohibited conduct and protections from retaliation.

For more information about FHI 360's safeguarding efforts, please contact our Safeguarding and Program Support Department at safeguarding.support@fhi360.org