



Safeguarding at FHI 360

FY24 Annual Incident Report

OCTOBER 1, 2023 – SEPTEMBER 30, 2024

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.

Meeting 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.

FHI 360 continues to work in close collaboration with our implementing partners to address big global challenges, including some of the most complex and heartbreaking crises around the world. We continue to witness massive displacement, impoverishment and competition for increasingly scarce resources. We've learned from our work over the past 50+ years that in times of crisis — due to strained infrastructures, limited resources and diminished systems to protect people — 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 incorporate concrete steps to ensure these types of harms do not occur at FHI 360 or within any FHI 360-supported project.

Due to the nature of our work, including working in fragile settings and with people who are often at higher risk of sexual exploitation and other abuse, there will always be a need for us to have protections in place to prevent these harms from happening in the first place — in all settings. It is imperative that we double up our efforts to prevent harm, mitigate risks and respond quickly and effectively if harm does occur.

We continue to make good progress, but there is always more to do.

Everyone who works with FHI 360, including our implementing partners, has a responsibility to keep work environments and programs safe and respectful for everyone. But FHI 360 leadership teams have a unique role in fostering a safe and positive organizational culture of transparency, equity and inclusion that supports our safeguarding efforts. FHI 360 project leaders are accountable for ensuring adherence to our minimum standards, including completion of an annual self-assessment tool and risk assessment and action planning tool. We track these project-level data through an internal safeguarding dashboard, which all projects can access.

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, global 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 who are supported by four regional safeguarding technical advisors, to integrate these standards across the organization and ensure the uniform application of FHI 360's **safeguarding policies**.

Tone is set at the top. FHI 360's Safeguarding Committee consists of executive team members, including the chief operating officer, chief people officer, chief compliance officer and general counsel. The committee is supported by the 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. The committee is responsible for communicating key information to FHI 360's board of directors.

In line with FHI 360's locally led development principles, we support implementing partners and other local organizations to help them 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 is 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.

FHI 360's ethics and compliance phone line and online reporting site are confidential and can be used to report harms and other concerns at any time. Reporters can choose to be anonymous if they wish and access the reporting options **here**. Our country offices and project teams also establish project-level or community-based 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 behavior. We also have dedicated investigators who are trained in conducting safeguarding-related investigations and follow up on all complaints to ensure effective and timely investigations.

Fiscal Year 2024 Highlights



Developed and launched an internal safeguarding dashboard to enhance how we collect and track project-level adherence to FHI 360's safeguarding standards.



Launched a new safeguarding page within the internal leadership dashboard to ensure key safeguarding-related indicators and outcomes are shared with the Executive Team and other senior leadership.



Began developing a toolkit to help local organizations enhance their safeguarding systems. With internal investment funds, we will finalize and field-test the toolkit with implementing partners across four regions in 2025.



Created a new **ethics and safeguarding page** on the FHI 360 website to share our commitments and prevention, risk mitigation, and response strategies with external stakeholders.



Endorsed the Foreign, Commonwealth & Development Office (FCDO)-supported Common Approach to Protection from Sexual Exploitation, Sexual Abuse, and Sexual Harassment (**CAPSEAH**), signaling our solidarity and commitment to collective action.



Co-facilitated several InterAction Pledge to Action working group meetings to share information and learnings among safeguarding leads from peer organizations.



Tessie San Martin, FHI 360 CEO, participated in a podcast hosted by the Sexual Violence Research Initiative (SVRI). "**How can we improve safeguarding against sexual abuse in the humanitarian sector?**"



FHI 360's Director of Safeguarding and Program Support presented at the SVRI 2024 Forum: "**Safeguarding beyond emergency settings: An adaptation for development contexts.**"

Summary of incidents in FY 24

During fiscal year 2024, FHI 360 received 49 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 reports that involve potential policy violations are investigated and appropriate actions are taken based on the findings.

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

- 19 of the 28 reports were assessed but not investigated because the report did not involve potential harm to a program participant by FHI 360 personnel or supplier/partner personnel. These cases were referred to project management or other relevant departments for further action and support.
- Nine of the 28 reports were determined to be potential policy violations and were fully investigated. Of these:
 - Eight of the nine reports involved allegations of harm toward adults⁴ (people 18 years old or above) by FHI 360 personnel (five reports) and by partner personnel (three reports).
 - One of the nine reports involved an allegation of harm toward a child by partner personnel and was reported to the appropriate authorities per FHI 360 policies and funder requirements.
- Four of the nine reports were substantiated incidents of policy violations with harm committed by FHI 360 personnel (two incidents) and by partner personnel (two incidents). Of these:
 - Two of the four incidents resulted in termination of employment of FHI 360 personnel.⁵
 - Two other incidents resulted in terminations by the partner, including one incident involving harm towards a child by partner personnel.
- Five of the nine reports were unsubstantiated or inconclusive due to insufficient evidence. Of these:
 - One incident still resulted in a written warning to the personnel by the partner/supplier.

21 reports involved allegations of harassment, including sexual harassment, or other abuse by personnel toward other personnel.

- 21 reports were determined to be potential policy violations and were fully investigated. Of these:
- Eight reports were substantiated as policy violations. In these cases, the harm was committed by FHI 360 personnel.
- Of the eight substantiated reports, seven resulted in verbal and written warnings, and one resulted in coaching.
- Thirteen reports were not substantiated due to either insufficient evidence or because the allegation did not rise to the level of a policy violation.
 - All thirteen unsubstantiated cases resulted in coaching or training.

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.

⁵ Those who violate FHI 360's safeguarding policies are subject to disciplinary action up to and including written warnings, coaching, training, and termination of employment or other relationship with FHI 360.

There are significant 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, and where there are gaps, put in place reporting mechanisms that are accessible to all in those communities.
- 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