
POL 01030 Safeguarding of Children

PURPOSE:

To set out FHI 360's behavioral expectations and guiding principles with respect to preventing and responding to abuse, exploitation, or neglect of children served by FHI 360 programs or whom FHI 360 Personnel or Supplier Personnel encounter in the implementation of those programs, including research projects or other business activities.

SCOPE:

This policy applies to all FHI 360 Personnel worldwide, and to Suppliers and Supplier Personnel to the extent set out below.

DEFINITIONS:

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| 1. <i>Child</i> | A person under 18 years of age irrespective of age of majority in the local context. ¹ | | | | |
| 2. <i>Child abuse and exploitation</i> | Any form of physical abuse; emotional ill-treatment; sexual abuse; neglect or insufficient supervision; trafficking; or commercial, transaction, labor, or other exploitation resulting in actual or potential harm to the child's health, well-being, survival, development, or dignity. | | | | |
| 3. <i>Child marriage</i> | Any formal marriage or informal union between a child under 18 years of age and an adult or another child. | | | | |
| 4. <i>Child trafficking</i> | <table border="0"><tr><td style="vertical-align: top;">a.</td><td>The recruitment, kidnapping, harboring, transportation, provision, obtaining, or receipt of a person under 18 years of age for the purposes of commercial sex acts or sexual exploitation, whether or not through the use of force, fraud, coercion, or abuse of power, regardless of whether it occurred within a country's borders or across international borders.</td></tr><tr><td style="vertical-align: top;">b.</td><td>The recruitment, kidnapping, harboring, transportation, provision, obtaining, or receipt of a person under 18 years of age for the purposes of subjection to involuntary servitude, peonage, debt bondage, forced labor or services, slavery or practices similar to slavery, whether or not through the use of force, fraud, coercion, or abuse of power, regardless of whether it occurred within a country's borders or across international borders.</td></tr></table> | a. | The recruitment, kidnapping, harboring, transportation, provision, obtaining, or receipt of a person under 18 years of age for the purposes of commercial sex acts or sexual exploitation, whether or not through the use of force, fraud, coercion, or abuse of power, regardless of whether it occurred within a country's borders or across international borders. | b. | The recruitment, kidnapping, harboring, transportation, provision, obtaining, or receipt of a person under 18 years of age for the purposes of subjection to involuntary servitude, peonage, debt bondage, forced labor or services, slavery or practices similar to slavery, whether or not through the use of force, fraud, coercion, or abuse of power, regardless of whether it occurred within a country's borders or across international borders. |
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| b. | The recruitment, kidnapping, harboring, transportation, provision, obtaining, or receipt of a person under 18 years of age for the purposes of subjection to involuntary servitude, peonage, debt bondage, forced labor or services, slavery or practices similar to slavery, whether or not through the use of force, fraud, coercion, or abuse of power, regardless of whether it occurred within a country's borders or across international borders. | | | | |
| 5. <i>Emotional abuse or ill-treatment</i> | Injury to the psychological capacity or emotional stability of the child caused by acts, threats of acts, or coercive tactics, including, but not limited to, humiliation, control, isolation, withholding of information, or any deliberate activity that makes the child feel diminished, embarrassed, or fearful. | | | | |

¹ For purposes of this policy and the content that is covered within it, a child is defined as a person under 18 years of age, irrespective of age of majority in the local context. However, during the delivery of HIV and sexual and reproductive health services, programs should follow local and national laws and/or guidelines for the age of consent for accessing these specific health services and for the collection and use of service data associated with the delivery of these health services.

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| 6. <i>Exploitation</i> | The physical, sexual, emotional, or other abuse of a child where some form of remuneration is involved or where the perpetrator benefits in some manner. |
| 7. <i>Female genital mutilation/cutting</i> | All procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons, including but not limited to piercing, cutting, removing, or sewing closed all or part of a girl or woman's external genitals. |
| 8. <i>FHI 360 Personnel</i> | FHI 360 employees, officers, members of the Board of Directors, interns, and fellows (paid or unpaid), volunteers, agents, and other individuals authorized to act on behalf of FHI 360. |
| 9. <i>Neglect</i> | The failure to provide for a child's basic needs where FHI 360-sponsored programs and staff have a clear responsibility for the care of the child in the absence of the child's parent or guardian. |
| 10. <i>Physical abuse</i> | 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, including, but not limited to, punching, beating, kicking, biting, shaking, throwing, stabbing, choking, hitting (regardless of object used) or burning. These acts are considered abuse regardless of whether they were intended to hurt the child. |
| 11. <i>Program Participant</i> | 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. |
| 12. <i>Sexual abuse of children</i> | A form of child abuse that includes sexual activity with a child. A child cannot consent to any form of sexual activity, ever. Child sexual abuse does not need to include physical contact between a perpetrator and a child. Some forms of child sexual abuse include: fondling a child's genitals, penetration including vaginal, oral, or anal, incest, rape, sodomy, indecent exposure, sexual language or obscene conversations in-person or via digital interaction (e.g., phone, text, social media), masturbation in the presence of a minor or forcing the minor to masturbate, and exploitation through prostitution or production of pornographic materials, and any other sexual conduct that is harmful to a child's mental, emotional, or physical welfare. |
| 13. <i>Supervisor</i> | An employee of FHI 360 who is in a direct supervisory role over the work of one or more employees of FHI 360. |
| 14. <i>Supplier</i> | Any FHI 360 contractor, consultant, vendor, service provider, subcontractor, or subrecipient. |
| 15. <i>Supplier Personnel</i> | A Supplier's employees, consultants, interns, and fellows (paid or unpaid), volunteers, agents, and other individuals authorized to act on Supplier's behalf. |

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POLICY:

1. Statement of Policy

- 1.1 FHI 360 takes seriously its responsibility to protect the dignity, rights and well-being of all children involved in its programs and activities around the world. The company is committed to providing a safe environment for children by holding all FHI 360 Personnel to high standards of conduct and implementing policies and procedures to prevent and respond to any harm that might occur as a result of a child's engagement with our organization or programs during in-person or virtual contacts, including instances of child abuse, exploitation, or neglect.
- 1.2 All FHI 360 Personnel must comply fully with host country and local child welfare and protection laws or with international standards, whichever gives greater protection, and must comply with U.S. law where applicable.
- 1.3 FHI 360 will take preventive measures, investigate complaints, and take appropriate action to stop any child abuse, exploitation or neglect that may occur, and will do so in a manner that is sensitive to the special needs of children and adolescents, including children who face barriers in reporting and accessing help because of their ethnicity, gender, age, religion, disability, or sexual orientation.
- 1.4 FHI 360 Personnel implementing projects must take measures to reduce the risk of child abuse, exploitation, or neglect, including adherence to FHI 360's Framework and Minimum Standards for Safeguarding Program Participants and implementation of FHI 360's Child Safeguarding Procedures. Examples of such measures include limiting unsupervised interactions with children; prohibiting exposure to pornography; ensuring children have access to age-appropriate reporting mechanisms; obtaining consent from parents or guardians to collect and utilize stories, photos, or videos of children; mapping local child-friendly resources, including psychosocial support and medical services; and complying with applicable laws, regulations or customs regarding photographing or filming children.
- 1.5 FHI 360's policy on Safeguarding of Children aligns with international, U.S., and U.K. government standards that aim to prevent child exploitation, abuse, and neglect, including but not limited to standards outlined in USAID's Standard Provision M27 –Safeguarding Against Exploitation, Sexual Abuse, Child Abuse, and Child Neglect – US Nongovernmental Organizations (October 2023); 48 C.F.R. § 752.7037, Child Safeguarding Standards (August 2016); and the Foreign, Commonwealth & Development Office (FCDO) Child Safeguarding Due Diligence for external partners (November 2022)

2. Prohibited Conduct

- 2.1 FHI 360 strictly prohibits all FHI 360 Personnel from engaging in any form of child abuse; emotional abuse or ill-treatment; exploitation; neglect; physical abuse; or sexual abuse of children served by FHI 360 programs or whom FHI 360 Personnel encounter in the implementation of those programs, including research.
- 2.2 FHI 360 Personnel are prohibited from engaging in any form of sexual activity with anyone under 18 years of age (or older if local laws indicate as such), regardless of the age of consent (to either sexual activity or marriage) or local customs or whether the individual under 18 years of age is a program participant or not.

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- 2.3 FHI 360 Personnel are prohibited from engaging in, facilitating, or participating in activities or ceremonies that involve female genital mutilation/cutting of any girl under 18 years of age, child marriage or informal unions, or child trafficking, regardless of local laws or customs or whether the individual under 18 years of age is a program participant or not.
- 2.4 FHI 360 Personnel must comply with local labor laws pertaining to employment and child labor, including engaging individuals under 18 years of age for domestic help in their place of work or home. In all cases, FHI 360 Personnel are prohibited from engaging children in work that deprives them of their childhood, their potential, and their dignity, and/or is harmful to their physical and/or mental development, including work that:
 - 2.4.1 is mentally, physically, socially, or morally dangerous and harmful to children; and/or
 - 2.4.2 interferes with their schooling by: depriving them of the opportunity to attend school when there are means to do so, obliging them to leave school prematurely, or requiring them to attempt to combine school attendance with excessively long and heavy work.
- 3. FHI 360's Universal Safeguarding and Anti-Trafficking Compliance Plan and Certifications
 - 3.1 **FHI 360's Universal Safeguarding and Anti-Trafficking Compliance Plan:** To ensure due diligence and uniform application of FHI 360's safeguarding policies, funder requirements, and international standards, FHI 360 developed a written Universal Safeguarding and Anti-Trafficking Compliance Plan ("Universal Plan"), which highlights the policies, standards, and procedures that FHI 360 has in place to prevent, detect, address, and respond to allegations of exploitation, sexual abuse, child abuse and neglect, and trafficking in persons. The Universal Plan aligns with U.S. and U.K. Government regulations and international standards related to safeguarding and anti-trafficking.
 - 3.2 **All FHI 360 country offices and projects must implement the requirements included in FHI 360's Universal Plan.** (Supplier requirements are included in Section 6.) Additionally, as part of implementing the Universal Plan, projects must complete the required information (placeholders for project-specific information) included in the Universal Plan.
 - 3.3 **Supplemental Plans for High-Risk Projects:** Safeguarding and anti-trafficking compliance plans must be appropriate to the size and complexity of the contract or award, and the nature and scope of the activities to be performed, including the trafficking and safeguarding-related risks that the project will involve based on populations served, services provided, and the context where activities will be implemented. Therefore:
 - 3.3.1 Projects that are larger, more complex, or involve a greater risk of exploitation, sexual abuse, child abuse and neglect, or trafficking in persons may need to implement measures in addition to those set out in FHI 360's Universal Plan to ensure that the compliance plans are appropriate to the size and complexity of the project, and the nature and scope of the activities to be performed.
 - 3.3.2 Projects must use the criteria outlined in the Universal Plan to determine if the project is high-risk, and if so, develop additional measures in a Supplemental Plan for High-Risk Projects ("Supplemental Plan") and include these additional measures in Section 6 of the Universal Plan (if applicable).

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- 3.3.3 When required by a funder to have a written compliance plan in place (pre-award), including an assessment to determine if a Supplemental Plan is needed for the project, the proposal team must ensure 3.3.2 is addressed during the proposal design stage. When the risk assessment and Supplemental Plan are not required by a funder (pre-award), the assessment should occur and Supplemental Plan developed, where needed, during project start-up.
- 3.4 **Posting of Compliance Plans:** FHI 360 posts its Universal Plan on FHI 360's internal Connect site and on its external website, www.fhi360.org. Hard copies of the Universal Plan will be posted at all FHI 360 offices. Projects that tailor the Universal Plan to include supplemental measures, will post their project-specific compliance plans at all project workplaces and sites, except where the project's work is not being performed at a fixed location, and email a copy of the tailored plan to all project personnel.
- 3.5 **Certifications:** Where required by funder, FHI 360 will sign and submit compliance plan certifications for projects as required by applicable regulations and contractual provisions. When funders request compliance plan certifications, project teams should coordinate with the point of contact for their proposal (pre-award) or contract (post-award) to obtain required signature for submission to funder.
4. Reporting Requirements and Procedures for FHI 360 Personnel
- 4.1 All FHI 360 Personnel who observe, suspect, or receive allegations of trafficking-related activity, or any other conduct prohibited by this policy, are required to report the conduct promptly, ideally within 24 hours or as soon as possible under the circumstances, either orally or in writing, by contacting **one** of the following: (Reporting requirements for Suppliers included in Section 6)
- 4.1.1 FHI 360 immediate supervisor, or, if the conduct involves the immediate supervisor, any other supervisor within their department
- 4.1.2 FHI 360 local People and Culture (HR) representative or regional or departmental HR Partner
- 4.1.3 FHI 360 Director of HR Partnering or Chief People Officer (see FHI 360 HR Connect site for contact information)
- 4.1.4 FHI 360 Office of Compliance and Internal Audit (OCIA) via one of the following options:
- Email: Compliance@fhi360.org
 - Website (anonymously or with your name) <http://www.fhi360.org/anonreportregistry>
 - Confidential Ethics and Compliance Phone Line: +1 833 745 8886
- 4.2. Anonymous reports are generally more difficult to investigate due to limited information. FHI 360 Personnel are urged to provide as much detailed information as possible about the conduct, including, if possible, identifying people who were involved or who witnessed the conduct, so long as this will not put the persons identified at risk of immediate harm.
- 4.3. FHI 360 Personnel who are HR staff, supervisors, or hold a position at director level or above are required to promptly report, ideally within 24 hours or as soon as possible under the circumstances, to FHI 360's OCIA or Headquarters HR (Chief People Officer or Director of HR Partnering), of any actual or suspected Trafficking in Persons or other violation of this policy that is reported to them, or that they observe or otherwise become

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aware of. Failure to do so is a violation of this policy and could lead to disciplinary action, up to and including immediate separation of employment or other relationship with FHI 360.

- 4.4. FHI 360 will investigate all reports of suspected or known exploitation, sexual abuse, or other violations of this policy, take appropriate action, and make any required notifications to government agencies.
5. Non-Retaliation:
 - 5.1 FHI 360 strictly prohibits any retaliation against FHI 360 Personnel, Suppliers, Supplier Personnel, or Program Participants who complain about sexual exploitation (SEA) or other violations of this policy or related procedures, or who participate in any internal or government SEA investigations, including child abuse, exploitation, and neglect investigations. FHI 360 Personnel can refer to FHI 360's Open Door and Non-Retaliation policy (POL 03004) for additional information.
 - 5.2 Retaliation occurs when someone penalizes or threatens to penalize another person for reporting or expressing an intent to report what they believe in good faith to be child abuse, exploitation or neglect or any other violation of this policy, assisting others in reporting such policy violations, or participating in investigations under this policy.
 - 5.3 Non-retaliation protection includes all Program Participants. No Program Participant or community member will be denied participation in a program or access to aid for reporting suspected or known child abuse, exploitation, or neglect, or participating in a related investigation.
 - 5.4 Suspected or known retaliation should be promptly reported via the reporting mechanisms set out in Section 4 (FHI 360 Personnel) and Section 6 (Suppliers).
 - 5.5 FHI 360 Personnel who engage in retaliation will be subject to disciplinary action up to and including separation of employment or other relationship with FHI 360.
6. Expectations of Suppliers and Supplier Personnel
 - 6.1 Suppliers and Supplier Personnel must refrain from any conduct that violates this Safeguarding of Children policy.
 - 6.2 FHI 360 requires that Suppliers similarly uphold the principles of this policy to prevent abuse, neglect, and exploitation of children by Supplier Personnel. Failure to do so may result in termination of Supplier's contractual relationship with FHI 360.
 - 6.3 Suppliers or Supplier Personnel who witness conduct prohibited by this policy or who identify that Supplier Personnel have engaged in any such conduct must promptly report the conduct, ideally within 24 hours or as soon as possible under the circumstances, either orally or in writing, to the FHI 360 OCIA by **one** of the following means:
 - 6.3.1 Email: Compliance@fhi360.org
 - 6.3.2 Website (anonymously or with your name)
<http://www.fhi360.org/anonreportregistry>
 - 6.3.3 Confidential Ethics and Compliance Phone Line: +1 833 745 8886
 - 6.4 FHI 360 requires that Suppliers cooperate fully with investigations and provide truthful information to investigators.
 - 6.5 Written Compliance Plans: Where funder requirements apply, FHI 360's Suppliers must maintain their own written safeguarding compliance plans, which can be a combined safeguarding and anti-trafficking plan. Suppliers may refer to FHI 360's Universal Plan for their own adaptation and use.

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- 6.6 Certifications: Where funder requirements apply, Suppliers must submit pre-award and/or annual Certifications.
- 6.7 FHI 360 will include the applicable funder requirements in Supplier contracts and other agreements.
- 7. Consequences of Policy Violations
 - 7.1 FHI 360 Personnel who commit child abuse, exploitation, or neglect; fail to report or forward reports of suspected child abuse, exploitation, or neglect; or otherwise violate this policy or related procedures will be subject to disciplinary action, up to and including immediate termination of employment or other relationship with FHI 360.
 - 7.1.1 FHI 360 may take legal action when required, against FHI 360 Personnel who have been found to commit child abuse, exploitation, or neglect, including referral to the relevant authorities for appropriate action, including criminal prosecution, in all relevant jurisdictions.
 - 7.2 Program Participants who violate this policy may be removed from FHI 360 programs and barred from participation in other FHI 360 programs.
 - 7.3 Violations of this policy by Suppliers or Supplier Personnel may result in FHI 360 terminating the Supplier's contract with FHI 360. Further, FHI 360 may pursue any contractual or other legal or equitable remedies that may be available.
- 8. Recruiting and References
 - 8.1 FHI 360, in compliance with applicable laws, will take all reasonable steps to prevent perpetrators of SEA and child abuse, exploitation, and neglect from being hired, re-hired, or re-deployed by FHI 360, including conducting reference and background checks for job candidates to the extent possible. This includes conducting reference checks through the Misconduct Disclosure Scheme (MDS) according to FHI 360's HR standard operating procedure for the MDS.
 - 8.2 As allowed by applicable law, FHI 360 Personnel must immediately disclose convictions or guilty pleas of any offense that relates to sexual exploitation and abuse.
- 9. Training Staff, Volunteers, and Suppliers
 - 9.1 All FHI 360 staff are required to complete safeguarding training during the new employee onboarding process, including content related to child safeguarding.
 - 9.2 Additionally, more in-depth training is delivered, as needed, by Safeguarding Focal Points and project teams to FHI 360 Personnel and Supplier Personnel who interact with or have exposure to Program Participants, including children.
 - 9.3 Project teams are responsible for training volunteers who work on FHI 360-supported projects on the requirements outlined in this policy.
- 10. Safeguarding Risk Assessment and Action Plans
 - 10.1 Projects that involve in-person or virtual interaction with Program Participants are required to assess project-level risks related to SEA, including risks related to child abuse, exploitation, and neglect, and outline strategies to mitigate risks.

For policy interpretation or questions, please contact the Chief Compliance Officer or Chief People Officer.

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RELATED DOCUMENTS:

1. Policies

- Code of Ethics & Conduct
- POL 01029: Combating Trafficking in Persons
- POL 01032: Protecting Program Participants from Sexual Exploitation and Abuse
- POL 03004: Open Door and No Retaliation
- POL 03011: Employee Discipline
- POL 03025: Recruitment

2. Standard Operating Procedures

NA

3. Appendices

- APX 01029_01: Universal Safeguarding and Anti-Trafficking Compliance Plan

REFERENCES:

1. USAID's Standard Provision M27 regarding Safeguarding Against Exploitation, Sexual Abuse, Child Abuse, and Child Neglect – US Nongovernmental Organizations (October 2023)
2. USAID's Standard Provision M20 regarding Trafficking In Persons – US Nongovernmental Organizations (April 2016)
3. 48 C.F.R. § 752.7037, Child Safeguarding Standards (August 2016)
4. The Foreign, Commonwealth & Development Office (FCDO) Safeguarding against Sexual Exploitation and Abuse and Sexual Harassment (SEAH) Due Diligence Guidance for FCDO implementing partners (January 2022) and Child Safeguarding Due Diligence for external partners (November 2022)
5. FAR Subpart 22.17 – Combating Trafficking in Persons (October 2020)
6. FAR 52.222-50 – Combating Trafficking in Persons (November 2021)
7. FAR 52.222-56 – Certification Regarding Trafficking In Persons Compliance Plan (October 2020)
8. International Labour Organization, definition of child labor (April 2023)
9. World Health Organization, definition of Female Genital Mutilation/Cutting (January 2023)
10. UNICEF, definition of Child Marriage (April 2023)

REVISION HISTORY:

POL#	Date Reviewed DD MMM YYYY	Summary of Changes
POL 01030	12/09/15	New Policy
POL 01030	10 SEP 2018	Updating Compliance hotline number for reporting of incidents.
POL 01030	05 JUN 2019	Changed definitions for FHI 360 Employees and Personnel New definitions and language regarding Suppliers and Supplier Personnel.
POL 01030	21 JUL 2023	Minor administrative change to update section 2.1.3 with titles vs. specific employee names. Updating policy format.
POL 01030	01 FEB 2024	Updated policy statements, reporting mechanisms, non-retaliation language, and expectations of Suppliers and Supplier Personnel. Added definitions and prohibited conduct related to child labor, child marriage, and female genital mutilation/cutting. Added footnote on following local laws related to age of consent for HIV and sexual and reproductive health services. Added sections on recruiting and references, required training, and risk assessments and action plans. Added requirement for a compliance plan. Added APX 01029_01 as related document. Updated references.
POL 01030	21 APR 2025	Updated reporting mechanisms.

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VERSION HISTORY

POL 01030 (v4.0)

Approved: 30-APR-2025 | **Effective:** 01-MAY-2025 | **Retired:** N/A
Updated reporting mechanisms.

POL 01030 (v3.0)

Approved: 22-MAR-2024 | **Effective:** 21-APR-2024 | **Retired:** 01-MAY-2025

Updated policy statements, reporting mechanisms, non-retaliation language, and expectations of Suppliers and Supplier Personnel. Added definitions and prohibited conduct related to child labor, child marriage, and female genital mutilation/cutting. Added footnote on following local laws related to age of consent for HIV and sexual and reproductive health services. Added sections on recruiting and references, required training, and risk assessments and action plans. Added requirement for a compliance plan. Added APX 01029_01 as related document. Updated references. Reviewed by Kim Dixon, Kristen Lingo, Susan Voskuil, Sean Temeemi, Useetha Rhodes, Andrea Bertone.

POL 01030 (v2.0)

Approved: 30-JUN-2019 | **Effective:** 30-JUN-2019 | **Retired:** 21-APR-2024
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Document Manager Approval

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Policy Owner Approval

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Policy Reviewer Approval

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Policy Exec Approval

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