



# Safeguarding at FHI 360

FY25 Annual Incident Report

**OCTOBER 1, 2024 - SEPTEMBER 30, 2025**

*This report provides an overview of our prevention, risk mitigation and response actions 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

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As mass displacement, impoverishment and competition for increasingly scarce resources continue to rise, FHI 360's work to address big global challenges and complex crises has never been more important. At the same time, strained infrastructures, limited resources and diminished systems to protect people increase the risk of harm — including harassment, sexual exploitation and abuse — to personnel and program participants in the communities where we work.

## **The level of risk of sexual exploitation and related harm has not changed.**

Approximately 85% of FHI 360 projects operate in insecure settings and/or involve interaction with populations that are at higher risk of experiencing sexual exploitation and related harm. Factors that contribute to the higher risk of harm include:

- Interaction with children or other populations at risk of harm (women, people with disabilities, refugees, etc.).
- Activities in schools, health clinics, refugee camps or other high-risk settings.
- Activities in countries that are experiencing conflict or natural disaster, rated as high risk in the [Sexual Exploitation and Abuse Risk Overview \(SEARO\) Index](#) or rated in the [U.S. Trafficking in Persons Report](#) as not meeting global standards.

These risks are exacerbated by challenges to reporting harm, including fear of retaliation, lack of knowledge about how to make a report, limited resources and strained infrastructures in the communities where we work. Together, these risks and reporting challenges create an environment that puts program participants at greater risk of exploitation or other harm.

## **We continue to take concrete steps to prevent harm and mitigate risks.**

Because we work in insecure settings and with people who are often at higher risk of sexual exploitation and other abuse, there will always be a need to have protections in place — in all settings — to prevent these harms from happening in the first place. At FHI 360, we are redoubling our efforts to prevent harm, mitigate risks and respond quickly and effectively if harm does occur.

# Our safeguarding approach

Safeguarding encompasses the systems and practices of preventing harm to people — especially children, young people and vulnerable adults — in both development and humanitarian project settings. At FHI 360, safeguarding includes:

- Designing and delivering **safe projects** 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** are required actions for safeguarding program participants. They are organized under eight domains (see graphic) and align with our policies, global standards, **InterAction's CEO Pledge** (which FHI 360 has signed), the Common Approach to Protection from Sexual Exploitation, Sexual Abuse, and Sexual Harassment (**CAPSEAH**), and major funder requirements. When they are fully and effectively applied, the 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 regional safeguarding technical advisors who provide support to more than 100 project-level safeguarding focal points. Together, the regional technical advisors and focal points help project teams integrate the safeguarding minimum standards across the organization and ensure the uniform application of [FHI 360's safeguarding policies](#).

**Because tone is set at the top, FHI 360's Safeguarding Committee consists of executive team members**, including the chief executive officer, senior vice president of global operations and services, chief people officer, chief compliance officer and general counsel. The committee is supported by the senior 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 safeguarding information to FHI 360's board of directors.

FHI 360 project leaders are accountable for ensuring adherence to our minimum standards and must complete an annual self-assessment tool and a risk assessment and action planning tool. We track these project-level data on an internal safeguarding dashboard that all projects can access.

**We support our partners** in strengthening their own organizational safeguarding capacity and provide them with safeguarding-related resources, including policy templates, standards, tools like the risk assessment tool, guidelines, training modules and awareness-raising materials.

**FHI 360 works to further strengthen our recruitment and hiring practices** through membership in the [Misconduct Disclosure Scheme](#) (MDS). MDS's goal is to stop perpetrators of sexual misconduct from moving undetected between organizations by providing 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 helps organizations 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 resources for reporting harms and other concerns at any time and offer anonymous reporting options. 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 anyone who may have experienced harm has 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 experienced investigators who are trained in conducting safeguarding-related investigations and who follow up on all reported harm to ensure effective and timely investigations.

# Fiscal Year 2025

## key achievements and focus areas



Maintained our internal safeguarding dashboard to collect and track adherence to FHI 360's safeguarding minimum standards. These data are used to identify gaps and support project teams in implementing our minimum standards, which align with global standards and practices.



Supported country offices and project teams to ensure updated posters and PSEA awareness-raising materials with information about how to report suspected or known harm are visible in FHI 360-supported offices and sites.



Began developing a toolkit to help our partners enhance their safeguarding systems. In FY 26, we will finalize and share the toolkit with our partners across various regions.



Generated quarterly project-level risk and compliance data for FHI 360's safeguarding committee, executive team, and board of directors.



Began country-level training for FHI 360's partners to increase awareness of FHI 360's policies and promote adherence to global safeguarding standards and best practices.

# Fiscal Year 2025 summary of incidents

During fiscal year 2025, FHI 360 received 19 reports that involved safeguarding-related allegations, including harassment, exploitation or other abuse toward or committed by FHI 360 personnel<sup>1</sup>, supplier personnel<sup>2</sup>, program participants<sup>3</sup> or others engaged with our organization. All reports that involve potential policy violations are investigated, and appropriate actions are taken based on the findings.

*Note: Due to the changes in U.S. government funding during 2025, many project activities were either terminated or temporarily paused, which decreased our engagement with program participants and, therefore, the number of reports received throughout this reporting period.*

## **16 reports involved allegations of sexual exploitation and abuse (SEA) and/or safeguarding concerns toward program participants by FHI 360 personnel or supplier personnel.**

- 11 of the 16 reports were assessed and did not warrant investigations 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.
- Five of the 16 reports were determined to be potential policy violations and were fully investigated.
  - Four of the five investigations involved allegations of harm toward adults<sup>4</sup> (people 18 years old or above) by partner/supplier personnel.
  - One of the five investigations was a safeguarding concern involving social media communication with a child by an adult program participant.
- Four of the five investigations were substantiated incidents of safeguarding policy violations committed by partner/supplier personnel (three incidents) and a program participant (one incident).
  - Three of the four substantiated investigations resulted in personnel terminations by the partners/supplier.
  - The other substantiated investigation resulted in an adult program participant being expelled from a higher learning program.
  - One of the five investigations was unsubstantiated or inconclusive due to insufficient evidence.

<sup>1</sup> 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.

<sup>2</sup> 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.

<sup>3</sup> 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.

<sup>4</sup> 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.

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

- Three reports were determined to be potential policy violations and were fully investigated. Of these:
  - Two reports were substantiated as policy violations. In one of these cases, the harm was committed by an FHI 360 employee. In the second case, the harm was committed by an employee of an FHI 360 partner organization.
  - Of the two substantiated reports, one resulted in verbal and written warning, and one resulted in FHI 360 suspending engagement with the partner organization.
  - One report was not substantiated because the allegation did not rise to the level of a policy violation. This unsubstantiated case resulted in coaching.

As we look ahead to 2026, we recognize the significant obstacles 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 obstacles to reporting continues to be a priority across the international development sector, including at FHI 360. To help reduce these challenges, 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 safeguarding at FHI 360, please contact our Safeguarding and Program Support Department at [safeguarding.support@fhi360.org](mailto:safeguarding.support@fhi360.org)**