CRS Policy on Safeguarding

Applies to:	All Staff, Worldwide EVP HR
Sponsor:	November 1, 2018
Created On:	January 1, 2019
Approved Revision:	December 31, 2020

Expiration Date: Purpose:

The purpose of this policy is to set a clear standard for all CRS staff regarding their moral and legal obligations to treat all people with respect, to actively prevent harassment, abuse, exploitation, and human trafficking-as defined below- and to report any such case whether observed or experienced.

Scope:

Safeguarding is the responsibility that all organizations have to ensure that their Staff and programs honor and protect the rights and dignity of all people-especially children and vulnerable adults-to live free from abuse and harm.

AtCatholicReliefServices(CRS), this responsibility is paramount given that safeguarding is seen as in integral part of the mission and values of the Catholic Church and one that is firmly rooted in our belief that each individual has a unique worth created in the image and likeness of God.

CRS employees, consultants, and volunteers, collectively known for purposes of this policy as CRS Staff, are expected to treat all people with whom they have contact with respect, to actively prevent harassment, abuse and exploitation, and to ensure our programs do no harm to the communities in which we work.

Likewise, CRS is committed to work only with organizations-including partners, vendors, and suppliers--whoareequally committed to the dignity of individuals and equally vigilant to preventing and addressing abuse and exploitation. (See Partner Safeguarding Standards and Vendor/SupplierCode of Conduct - Both of these documents are coming soon)

WhereasmanyCRS policies vary across regions - contextualized to particular locations and cultures - the CRS Safeguarding policy is universal to- and binding upon -- all of our staff around the world. As such, Country Programs

need to ensure that this universal policy is incorporated into local employment manuals and approved by local authorities, as applicable.

In addition, because we expect anyone employed by CRS to live our values at all times, this policy applies to CRS Staff activities and behaviors at work, outside work, and while on leave.

Policy:

CRS is committed to creating and maintaining an environment-both in our workplace and in our projects-that promotes our core values and prevents the abuse and exploitation of all with whom we interact. Abuse and exploitation constitute acts of serious misconduct and are therefore grounds for disciplinary action including termination and, as relevant, notification to specific donors and/or appropriate law enforcement authorities.

All CRS Staff are obligated to report any concerns or suspicions of harassment, abuse and exploitation involving CRS Staff, partners, beneficiaries, vendors or aid workers associated with another organization. The concern may be a result of witnessing the incident, being told of it, or being the object of it. CRS Staff should report all concerns through any of the following channels: their supervisor, the global CRS whistleblower site, a local CRS whistleblower site, Human Resources (HR), or the respective Country Representative.

In no case, should any of CRS Staff investigate an allegation or a reported allegation on their own, outside of standard reporting protocols.

All reports will be promptly investigated and addressed and treated with due regard for the privacy of the individuals involved. It is important for all reporters to understand, however, that CRS is legally mandated to follow up on certain allegations-regardless of the preference of the reporter-and that strict confidentiality cannot always be guaranteed due to the organization's moral and/or legal obligation to investigate. In the case when CRS or the reporter believe that an investigation could put the reporter in danger, CRS will take reasonable steps to protect thesafety and security of the reporter.

Reporters will be notified of the steps being taken to assess and/or investigate the allegation, as well as any final assessment/ outcome

Neither CRS nor its Staff will retaliate--in the form of an adverse employment action (termination, demotion, etc.) or harassment-against any individual reporting an allegation in good faith or participating in an investigation. Any form of retaliation is grounds for disciplinary action including termination.

In addition, CRS is committed to ensuring that program participants-and members of communities in which they live-are aware of what staff behavior is acceptable and how they can raise their concerns or questions in a confidential and secure manner.

Harassment

Harassment is unwanted, unwelcomed and uninvited behavior that demeans, threatens or offends and results in a hostile environment for the victim.

CRS is committed to a work environment that is professional and free from intimidation, hostility, or other offenses which might interfere with the dignity of an individual or work performance.

This includes, but is not limited to, harassment based on ethnicity, color, religion, sex, age, sexual orientation, national origin or ancestry, disability, medical condition, marital status, or veteran status.

General harassment is not sexual in nature and can take many forms including verbal, physical, and visual. It includes actions directed at an individual or actions observed by an individual.

- Verbal: Includes the use of offensive words, jokes, threats, or derogatory statements.
- Physical: Includes inappropriate physical contact or assault, as well as demeaning/ unwelcome pranks.
- Visual: Includes cartoons, pictures, and posters, as well as inappropriate electronic communications (emails, etc.)

General harassment can also include bullying, defined as repeated healthharming mistreatment of one or more persons by one or more perpetrators and includes (but is not limited to) threats, intimidation, public humiliation/ namecalling, persistent and unwelcome teasing, or intentional work interference/sabotage.

Sexual Harassment

Sexual harassment is a specific type of harassment which can cross age and gender boundaries and may include unwelcome sexual advances, requests for sexual favors, or other verbal or physical contact of a sexual nature including:

• The sharing or posting of images that create an offensive, hostile or intimidating environment or interferes with an individual's job

performance. Examples include-but are not limited to-offensive pictures, cartoons, symbols, or items in the workplace

- Downloading sexually explicit pictures or materials from computer systems, even if not shared with others
- Unwanted or inappropriate leering or touching
- Requests of a sexual nature made by one person to another that demand or imply a condition of employment or compensation, either implicitly or explicitly, or when an employment decision is based on and individual's acceptance or rejection of such conduct.

Exploitation

Exploitation-defined as actual or attempted abuse of power or mistreatment based on a power differential and/or position of vulnerability-is unacceptable under any circumstances but is particularly abhorrent when it involves CRS beneficiaries, children, or vulnerable adults.

For purposes of this policy, a *child* is defined as anyone under the age of 18, and a *vulnerable adult* is defined as anyone in need of community care services by reason of mental or other disability, age or illness, and who is unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

Prohibited exploitation includes:

- Physical abuse (violence towards or deliberate injury)
- Emotional abuse (humiliating, degrading, or aggressive behavior)
- Sexual abuse
- Economic abuse (requiring payments or goods in exchange for services)

Prohibited exploitation also includes child labor, defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It includes work that is mentally or physically dangerous and/or interferes with their schooling.

Prohibited exploitation also includes sexual exploitation. CRS Staff are prohibited from any sexual relations with children and vulnerable adults including the exchange of money, employment, goods, or services for sex, sexual favors or other forms of humiliating, degrading or exploitative behavior or general preferential treatment; this includes exchange of assistance that is due to beneficiaries.

• For children, this policy applies regardless of the age of majority or consent and mistaken belief in the age of a child is not a viable defense.

Sexual relations between aid workers and beneficiaries (of any age) are prohibited and is grounds for termination.

In addition, knowingly facilitating or aiding another aid worker to perform acts of exploitation or abuse is strictly prohibited and will be treated with the same level of consequence as if the activity was being done directly by CRS Staff.

Trafficking

Trafficking in persons is defined as the recruitment, transportation, or receipt of persons by means of deception, coercion, threat, or force for the purpose of exploitation, sexual or otherwise. CRS strongly condemns trafficking in human beings-children, women, and men-as a criminal act that violates fundamental human rights and the inviolable dignity and integrity of the human person.

All CRS Staff are prohibited from engaging in trafficking in children, women and men. CRS places a special focus on anti-trafficking of women and children, given their specific vulnerability and given the cruelty and perversity to which trafficked women and children are particularly subjected.

All CRS Staff are prohibited from engaging in:

- Trafficking in children, women, and men for sexual exploitation or procurement of any commercial sex acts (even if this practice is legal in a particular jurisdiction) including forced prostitution, child prostitution and pedophilic pornography
- Trafficking in women and girls for purposes of forced or arranged marriages, or for any bride price schemes
- Trafficking in children, women, and men for removal of organs for the illicit organ trade or for the illicit dealing, running or trafficking of narcotics and drugs;
- The use of force, fraud, or coercion to subject a child, woman, or man to forced labor, begging, or involuntary servitude; and shall not obtain labor from a child, woman, or man by threats of serious harm to that person or another person.

All CRS Staff are also prohibited from employment practices related to trafficking, including:

- Destroying, concealing, confiscating, or otherwise denying access to an employee's identity or immigration documents
- Using misleading or fraudulent practices to recruit employees such as failing to disclose key terms and conditions of employment or charging employees recruitment fees
- Using recruiters that do not comply with local labor laws
- Failing to provide return transportation to any employee specifically brought to a country for the purpose of working on a project
- Providing or arranging housing that fails to meet host country housing and safety standards
- Failing to provide a valid employment contract or work document where required by law.

CRS also prohibits Staff from obtaining work-related goods or services that have been provided or produced by trafficked or forced labor.

Adherence:

Failure to adhere to the policies stated above constitutes grounds for disciplinary action including termination and, as relevant, notification to appropriate law enforcement authorities.

Interpretation and Questions:

Questions on the interpretation of this policy-and any other questions-can be directed to your designated <u>HR Business Part ner</u>.

Related Documents and Procedures:

- Staff Safeguarding Procedures (coming soon)
- Partner Safeguarding Standards and Procedures (coming soon)
- Vendor/ Supplier Code of Conduct (coming soon)

Key Words:

Harassment, "sexual harassment", abuse, exploitation, investigation, retaliation, "child labor", trafficking