

POLICY ON PROTECTION FROM ABUSE AND EXPLOITATION

Policy Number: POL-HRD-GEN-0026
Approved By: Executive Leadership Team
Date Approved: 02/25/14
Date Released: 05/27/14
Revised: 09/19/2014

PURPOSE:

To establish CRS' standards, practices, procedures, and responsibility to protect children¹ and vulnerable adults² from abuse and exploitation.

SCOPE:

1. All CRS Staff: Domestic (US-based), International, and National staff ("Staff")
2. Consultants, volunteers, interns and project partners in service to CRS ("Affiliates").

DESCRIPTION:

As part of the guiding principles of CRS and the universal mission of the Catholic Church, CRS "assists people on the basis of need, not creed, race or nationality." CRS offers support to all women, men, boys or girls, regardless of creed, socioeconomic background, culture, disability, health status, or any other distinguishing features.

CRS promotes the wellbeing of individuals to realize their full human potential, in solidarity with others, respecting the dignity of every person and caring for the most vulnerable and marginalized.

Staff and Affiliates are expected to serve with integrity and promote right relationships in the delivery of goods and services while executing their responsibilities.

CRS recognizes the unique needs of children, women, and vulnerable adults and, therefore commits itself to creating and maintaining an environment that protects these individuals.

Protecting Children and Vulnerable Adults:

CRS prohibits all forms of exploitation and abuse, namely:

Staff and Affiliates are prohibited from engaging in sexual activity with children (persons under the age of 18, regardless of the age of majority or age of consent locally)³.

Child labor⁴ is a form of exploitation and abuse; therefore the agency prohibits the hiring of children.

¹ CRS defines a child as any person under the age of 18, regardless of local age limits.

² Vulnerable adults include women and other vulnerable adults who are at greater risk due to factors such as age, sex, disability, or other vulnerabilities.

³ This prohibition shall not apply where the employee is legally married to someone under the age of 18 but over the age of majority or consent in their country of citizenship (in accordance with national laws).

⁴ The term "child labor" generally refers to any economic activity performed by a person under the age of 15, defined by the International Labour Organization (ILO) of the United Nations.

CRS Staff and Affiliates are prohibited from causing any physical or emotional harm to children or vulnerable adults.

Staff and Affiliates are prohibited from the exchange of money, employment, goods, or services for sex, including sexual favors.

Staff and Affiliates are also prohibited from any form of humiliating, degrading, or aggressive behavior toward children, women, and vulnerable adults.

Staff and Affiliates are not to use their power or position to withhold assistance or services, or to give preferential treatment.

Staff and Affiliates are prohibited from using their power or position to request or demand payment, privilege, or any other benefit.

Facilitating or aiding another humanitarian worker to perform acts of exploitation or abuse is strictly prohibited.

RESPONSIBILITY TO REPORT:

All Staff and Affiliates are obligated to report any concern or suspicion of exploitation and abuse of a child or vulnerable adult involving CRS Staff, Partner Staff and/or other humanitarian workers. Failure to report may put the victim and the Agency at risk and is a breach of this Protection Policy and CRS' Code of Conduct.

Further, Staff and Affiliates should actively identify and report risks in CRS programs that could present an opportunity for abuse, or where safeguards are insufficient to protect children and vulnerable adults.

Staff and Affiliates are expected to uphold the dignity of all individuals and maintain the highest standards of personal and professional conduct.

Staff and Affiliates are required to report all forms of exploitation or abuse in good faith, using CRS' reporting procedures:

Staff and Affiliates are not to investigate cases on their own; rather, they are to report and follow CRS' reporting procedures.

Staff and Affiliates who report in good faith are not subject to reprisal.

PROCEDURES:

CRS shall ensure confidentiality and the security of all involved, and of relevant records and documentation.

All Staff and Affiliates shall:

1. Complete the Protection training module through CRSLeads (Staff Only);
2. Familiarize themselves with the Protection Policy;
3. Sign the Acknowledgement of the Policy on Protection from Abuse and Exploitation;
4. Report concerns of suspected exploitation or abuse in accordance with the Reporting

Procedures.

Headquarters Human Resources shall:

1. Provide orientation to Domestic and International Staff regarding the Protection Policy and obtain a signed Code of Conduct and Acknowledgement of the Policy on Protection from Abuse and Exploitation;
2. Develop an e-learning training module and promulgate to all Staff;
3. Provide ongoing counsel and support to Regions, Country Programs, and U.S. offices;
4. Maintain a confidential and secure reporting system and mechanism;
5. Undertake prompt and thorough investigations in collaboration with the Region or Country Program Management or both, maintaining confidentiality to the maximum extent possible (i.e., disclose information only on a "need to know" basis);
6. Provide training to Country HR staff and designated Protection focal point personnel;
7. Ensure CRS' recruitment and orientation procedures incorporate standards of protection; and
8. Monitor and update the policy and related documents at a minimum of every three years.

Country-Level Human Resources shall:

1. Assist Country Programs in implementing protection measures outlined in the Protection Implementation Field Guide;
2. Provide orientation to National Staff and ensure that Staff complete mandatory Protection training.
3. Ensure protection procedures are routinely monitored and reviewed in conjunction with Internal Audit; and
4. Assist partners in the adaptation of the agency-wide Policy on Protection from Abuse and Exploitation to local contexts.

Country Programs shall:

1. Provide appropriate victim assistance as stipulated in the Field Implementation Guide;
2. Utilize the agency's reporting system, and where needed, develop community complaint mechanisms;
3. Investigate suspected cases of exploitation or abuse involving in-country staff as stipulated in the Field Implementation Guide;
4. Conduct annual protection training for in-country staff;
5. Ensure a signed Code of Conduct and Acknowledgement of the Policy on Protection from Abuse and Exploitation are on file for in-country staff; and
6. Assist partners with:
 - a. Signing the Code of Conduct or Protection Policy process to set standards of behavior;
 - b. Establishing an in-country reporting mechanism for suspected cases of exploitation and abuse;
 - c. Implementing investigating procedures;
 - d. Accessing training materials;
 - e. Establishing hiring procedures that include standards of protection;
 - f. orientation of in-country new hires; and
 - g. Establishing a process for obtaining a signed Code of Conduct from partner staff and project volunteers.

Partners shall:

1. Sign the CRS Code of Conduct and adhere to its standards
2. Commit to establishing a Policy on Protection

Regional Office shall:

1. Provide oversight, resources, and support to country programs for the implementation of protection standards.

CONSEQUENCE:

Staff or Affiliates who fail to comply with the CRS' protection policy and standards of behavior are subject to disciplinary action including termination or dismissal.

Reporting which proves to have been made maliciously or intentionally false will be viewed as a serious disciplinary offense.

RELATED DOCUMENTS:

- 1 - Acknowledgement of the Policy on Protection from Abuse and Exploitation
- 2 - Code of Conduct (POL-HRD-GEN-0017)
- 3 - Standards of Behavior Toward Children
- 4 - Report Form: Suspicion of Abuse or Exploitation
- 5 - Reporting and Investigation Procedures
- 6 - Glossary of Terms
- 7 - Frequently Asked Questions (FAQs)
- 8 - Release Form for Photo, Video, Interview, Art
- 9 - Training Module