



# CODE OF CONDUCT and ETHICS

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## PURPOSE

To ensure that all CRS Employees, Affiliates, and Board Directors are aware of the agency's Code of Conduct and Ethics and CRS' commitment to the highest standards of personal integrity, moral conduct, ethics, and accountability to those we serve. In addition, the agency will implement and require appropriate training on this Code of Conduct and Ethics for its various constituencies.

## SCOPE

1. All CRS employees: US-based, Expatriate, and Country Program staff ("Employees")
2. All Volunteers and interns in service to CRS ("Affiliates").
3. All members of the CRS corporate Board and the CRS Foundation Board of Directors.
4. CRS encourages consultants, contractors and project partners to have or develop a Code of Conduct and Ethics substantially similar to this CRS policy, and receive training on the same. In the absence of such a policy and training, such consultants, contractors and project partners are encouraged to voluntarily adopt and train their staff on this CRS policy.
5. CRS expects and requires all subcontractors, for contracts funded and awarded by the United States government, to have or develop a Code of Conduct and Ethics substantially similar to this CRS policy, and receive training on the same. In the absence of such a policy and training, such consultants, contractors and project partners are expected to voluntarily adopt and train their staff on this CRS policy.

## INTRODUCTION

This Code of Conduct and Ethics outlines CRS' commitment to the highest ethical standards to serve with respect and integrity, promote dignity and model stewardship. It aligns with and amplifies existing CRS values, policies and procedures, guiding principles, and the laws and regulations that govern our operations. The teachings of the Catholic Church are central to CRS' identity, and those teachings resonate with many of the other great religions of the world. Our Code has further been informed by and developed to reflect the Caritas Internationalis Code of Ethics which prescribes the basic values and institutional practices of Caritas organizations.

The Code of Conduct and Ethics represents our commitment to creating and maintaining an environment that respects and values CRS employees, partners, donors, and beneficiaries. Upholding ethical standards helps us to maintain compliance with legal, regulatory, and donor requirements. At the same time, our commitment and values call us to do more by acting responsibly and with integrity, making good judgments, and always striving to do no harm in our service to others.

All who are associated with CRS have the responsibility to uphold this Code of Conduct and Ethics. While it does not address every situation specifically, the Code of Conduct and Ethics provides the guidance we need to conduct our work ethically, with integrity, and in a manner that is consistent with CRS' values. The standards outlined here have been the pillars of our success since we were established in 1943. Our reputation and future success rests in each one of us doing our part to promote ethics, integrity, and respect when serving others and in our decision-making. The agency will monitor and update the policy and related documents as necessary, including a comprehensive review at a minimum of every three years.

## **A: Maintaining Safety and Wellbeing**

Our standards on respect, safety, and wellbeing are the core values that inspire our mission, and in turn contribute directly to our success. CRS' Code of Conduct and Ethics is about maintaining respect, safety, and wellbeing of all those we work with and serve. We must all work together to maintain an environment that promotes respect for everyone at work, and for all beneficiaries, partners, and donors with whom we serve and work. The agency and all employees must know and maintain the following standards and procedures for safety, respect and wellbeing.

### **A.1. Protecting Children and Vulnerable Adults**

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. Our policy on protection establishes standards, practices, procedures, and responsibility to protect children and vulnerable adults from abuse and exploitation. For more information, please refer to the [Policy on Safeguarding](#) (external link) or [Policy on Safeguarding](#) (link for internal staff).

### **A.2. No Harassment**

CRS is committed to providing a work environment that is free from harassment, thereby promoting the dignity and equality of the human person. Harassment interferes with an individual's wellbeing, work performance, and dignity and will not be tolerated. Harassment of co-workers, counterparts, and beneficiaries is equally prohibited. Harassment includes verbal, physical, visual, electronic, or other forms of intimidation, hostility, or offensive conduct. It may be based on race, color, religion, ancestry or national origin, sex, age, marital status, sexual orientation, physical or mental disability or handicap, medical condition, protected veteran status, or genetic information and any other status protected by law. Harassment does not include expressing or explaining Catholic teaching, establishing or implementing policies that are based on Catholic teaching, or exercising CRS' right to prefer the employment of Catholics for some positions. For more information, please refer to the [Policy on Safeguarding](#) (external link) or [Policy on Safeguarding](#) (link for internal staff).

### **A.3. Responsible use of social media**

CRS encourages the use of social media in ways that are consistent with its Guiding Principles and ensure the safety, privacy, and human dignity of employees, partners, and beneficiaries. For more information, please refer to the [Social Media Policy](#) (CRS Social Media Policy, POL-HRD-GEN-0015).

#### **A.4. Non-discrimination**

The success of CRS is directly related to the trust and credibility we inspire by ensuring a work environment free from unlawful discrimination. CRS is committed to equal employment opportunity and to the development of talent and learning of a workforce with diverse skills and experiences. No discrimination will be tolerated under any circumstances at any locations. Specifically, discrimination on the basis of race, color, religion, national origin, sex, age, sexual orientation, disability, marital status, genetic information, or any other characteristic protected by law is prohibited. This prohibition covers all terms, privileges and conditions of employment including, without limitation, recruitment, hiring, assignment, compensation, promotion, discipline, and termination. However, conduct at odds with Catholic teaching may influence some CRS employment decisions. Additionally, some positions may require a CRS employee to be a US citizen and some positions require that an employee be in full communion and good standing with the Catholic Church. For more information, please refer to the [Equal Employment Opportunity Policy](#) (Equal Employment Opportunity, POL-HRD-EMP-0019).

#### **A.5. Prohibited drug use, substance abuse, and smoking**

CRS promotes a drug free workplace. All employees and contractors are expected to comply with CRS' policy on a drug-free workplace. The agency is committed to a work environment that is free from substance abuse (alcohol and drugs). CRS reserves the right to require drug testing upon reasonable suspicion of an employee's use or abuse of drugs or a controlled substance in violation of its policies. To protect and enhance our indoor air quality and to contribute to the health and well-being of all employees, all CRS offices are smoke free. No smoking or other use of tobacco products (including but not limited to cigarettes, pipes, snuff, chewing tobacco, or electronic smoking devices) is permitted in any part of any CRS office or vehicle. For more information, please refer to the policies on [Drug-Free Workplace](#) (Drug-free Workplace, POL-HRD-GEN-0008), [Substance Abuse](#) (Substance Abuse, POL-HRD-GEN-0007) and [Smoking](#) (Smoking, POL-HRD-GEN-0004).

#### **A.6. Prevention of Trafficking in Persons**

CRS strictly prohibits human trafficking in all forms. Neither CRS nor any employee, subcontractor, vendor, or agent is permitted to engage in certain activities or practices that constitute, encourage, or support human trafficking. For more information, please refer to the [Policy on Safeguarding](#) (external link) or [Policy on Safeguarding](#) (link for internal staff) and the [Anti-Trafficking in Persons Compliance Plan](#).

### **B: Protecting Assets; Safeguarding Confidentiality**

All CRS Employees and Affiliates share a duty and responsibility to safeguard confidentiality and use resources justly, equitably, and efficiently in accordance with applicable guidelines, laws, and regulations. For more information, please refer to our policies on [Workplace Conduct](#) and on [Dismissal for Cause](#) (General Workplace Conduct Policy, POL-HRD-GEN-0009; Dismissal for Cause Policy, POL-HRD-EMP-0017).

### **B.1. Protecting assets and property**

Employees shall protect agency assets and property at all times. CRS' assets and property include time, proprietary information, funds, and equipment. Illegal or criminal use of agency property or assets is prohibited. An employee is expected to, among other things:

- Give the time needed to fulfill their job responsibilities;
- Take reasonable care of CRS' property so that it is not damaged, misused, wasted, lost, or at risk of being lost;
- Advance CRS' legitimate work interests whenever opportunities arise; and
- Protect CRS' confidential and proprietary information and intellectual property.

### **B.2. Safeguarding confidentiality**

All CRS Employees and Affiliates, both during and after employment, are required to safeguard the agency's confidential, proprietary, and/or sensitive material and information that they have access to. Such material and information includes but is not limited to:

- Human resources information including employee personnel records and terms of employment;
- Donations, donor records, and funding agreements;
- Supplier lists, proposals, agreements, confidential pricing data;
- Confidential information and materials obtained from staff meetings, department projects, management meetings or other sources;
- Computer systems and software data including electronic computer passwords or other security codes that allow access to private personnel data or to any information contained in confidential records or reports;
- Access code and password for electronic banking (including electronic fund transfers, mobile banking, corporate credit cards, pre-paid debits cards and others);
- Reports of abuse, exploitation, fraud or other violations of CRS standards;
- Intellectual property such as designs, ideas, brand, and copyright materials
- Financial records and documentation;
- Legal records and legal correspondence; and
- Any other information marked confidential or which is by its nature confidential.

### **B.3. Privacy**

CRS is committed to protecting employee privacy. To this end, CRS maintains employment files in a secure and confidential manner under the Human Resources department. Employees have a right to review their employment files with a request to the human resources personnel in their Country Program, their Country Representative, their Deputy Regional Director MQ, or the Director of Human Resources in Baltimore HQ. When required by law, and in compliance with applicable regulations, third parties or government agencies may also be permitted to view the employment files. CRS maintains the integrity of employee payroll information. The agency's health benefits plan complies with the privacy rules and provides employees with notices that explain the participants' rights.

## **C: Transactions and Procurement Ethics**

The importance of performing due diligence in all our transactions and procurement is critical to maintaining our success and reputation. Our mission at CRS to help the poor around the world involves serving within complex regulations worldwide, and with a requirement for accountability to beneficiaries, partners, and donors. The following standards and procedures are essential to

carry out our mission and to maintain responsible stewardship of the resources entrusted to our organization.

### **C.1. Financial Integrity**

CRS has a responsibility and legal duty to protect financial assets and resources. To maintain financial integrity, employees shall comply with all applicable CRS standards and policies in recording, retaining, and reporting financial information. Financial data and records shall be maintained as current, accurate, and complete. Record-keeping procedures will be timely to ensure that all costs are properly charged and reported, and to maintain compliance with policies and financial and accounting standards, donor requirements, and legal regulations and laws.

For more information on financial integrity, refer to the following:

- [Finance Policies Site](#)
- [Transaction Documentation](#) (Transaction Documentation Policy, POL-FIN-DOC-008).
- [Finance Ethics Procedure](#) (Code of Finance Ethics Procedure, PRO-FIN-ETH-003).

### **C.2. Internal Controls**

All of CRS' work must be conducted within an environment of internal control, in accordance with existing policies and guidelines. The organization's internal controls and operating procedures are intended to detect, prevent, deter, and, where appropriate, disclose improper activities and misuses of those resources. CRS' internal controls shall be effected by the board of directors, management, and other personnel, designed to provide reasonable assurance in all of our operations, reporting, and compliance.

All employees shall maintain sound internal control over CRS' resources and activities, to cost-effectively reduce the risk of loss or misuse of funds or property to an endurable level. All transactions must be properly recorded in appropriate books in order to avoid potential weaknesses in internal controls and to comply with stated CRS policies and procedures. The agency shall maintain risk assessment to ensure timely identification, analysis and management of risks to the achievement of our mission. Information, communication systems and monitoring processes shall be used for timely exchange of information and to assess the quality of internal control performance and learning. In the event that CRS' books, records, and systems are reviewed, audited, or investigated by a Government agency, CRS employees will provide full cooperation with the Government agency responsible for any such audit, investigation, or review.

### **C.3. Procurement of goods and services**

CRS is committed to the procurement of goods and services in a manner that maximizes contribution to and support of our customers worldwide and the agency's strategic objectives in both normal and emergency situations. All goods and services shall be procured in accordance with agency procurement policies and procedures, and through optimized purchasing economies of scale, use of leading-edge technologies and concepts, ethical sourcing, and highly professional practice at all levels.

#### **Procurement contracts and agreements**

Procurement contracts or agreements shall be used as the legal instrument to effect the purchase of goods or services. Procurement contracts and agreements establish legally enforceable promises, offered and accepted by the parties, supported by the exchange

of things of value (e.g. goods, services, money). Procurement contracts can be formal contracts or in the form of a Purchase Order (PO) as defined in CRS policies.

### **Purchases**

All employees who are involved with procurement transactions are required to follow the policies and procedures of CRS when committing agency funds for purchases. Purchases must be pursued in accordance with the Global Procurement Manual to reduce agency liability, verify that the agency is paying the best possible terms for goods/services, and ensure adherence to donor requirements. Purchases shall be conducted in a timely fashion and documented even in situations of rapid response emergency, taking into account CRS' three key purchasing factors: quality, delivery, and price.

### **Suppliers**

CRS regards suppliers as partners, and as such, it is important to maintain an atmosphere of honesty and integrity in working with them. Selection of suppliers shall be ethical, based exclusively on quality, service, price, and suitability to the agency's needs. Employees directly responsible for purchasing shall not have any personal or family interest, involvement, or financial relationship with a supplier that might impair objectivity or freedom of judgment. Ethical sourcing of suppliers shall be maintained, in compliance with the guidelines and policies set out by CRS' procurement policies and procedures. The Global Procurement team and local Country Programs are to maintain a solid and reputable supplier base. Employees should avoid using CRS suppliers for personal needs.

### **Consultants and Contractors**

Consultants and independent contractors working for CRS are not employees and so their terms of service shall be outlined in a consultancy agreement reviewed, processed, and approved through HQ/Baltimore Human Resources or local Country Program policy. Consultants may not supervise agency personnel nor is the consultant's day-to-day work subject to supervision by Employees of the agency. Consultancy services shall be outlined in the Scope of Work with deliverables that do not include work that is normally done by employees.

For more information on procurement of goods and services, refer to:

- [Global procurement manual](#) and Global Procurement Policies [Approved Supplier List](#) policy, POL PUR SUP 001; Procurement Policy Executive Summary, POL-PUR-SUM-001; Procurement Contracts, POL-PUR-POS-001; return procedure, PRO-PUR-RETURNS Procedure).
- [Consultants \(Independent Contractors\) Policy](#):<https://global.crs.org/communities/employeeservices/policies/pol-hrd-emp-0004.htm> (Consultants/Independent contractors, POL-HRD-EMP-0004).

## **C.4. Conflict of Interest, fraud or corruption**

Our CRS values and guiding principles commit us to avoid conflict of interest, and to never accept any form of fraud or corruption in compliance with operational regulations.

### **Conflict of Interest**

CRS has confidence in the integrity of its employees but recognizes the possibility that conflicts of interest may arise. It is the policy of CRS that no employee shall take any action or make any statement intended to influence the action of another, including donors and beneficiaries, to benefit the personal interest of the employee or the employee's family members, rather than the interest of the agency. If you are in doubt as to whether an activity could be regarded as a conflict of interest, you must seek clarification from your immediate supervisor, human resources personnel in your Country Program, your Country Representative, your Deputy Regional Director MQ, or from the Director of Human Resources in Baltimore HQ.

In compliance with CRS' governance policy, CRS Board members and "key employees" are required to file an annual Conflict of Interest disclosure with the Corporate Secretary.

### **Gifts, Entertainment and Hospitality**

CRS employees shall not solicit, request, accept, or agree to accept any significant gift from a CRS partner or prospective partner. A significant gift is defined as any tangible item, service, favor, credit, or discount of value, not available to others, that could influence decisions and actions. No monies are to be accepted as a personal gift for any reason whatsoever. In addition, CRS' funds shall not be used to provide gifts to any partners or any other groups in order to influence decisions or planning related to pending projects. CRS employees are prohibited from offering or accepting any work-related entertainment or hospitality including meals or travel, unless it is permitted by law or regulation. Offers of entertainment and hospitality from CRS suppliers shall be declined tactfully, but clearly. For more information, please refer to our policy on [Parties and Gifts](#) (CRS Funded Parties and Gifts Policy, POL-HRD-GEN-0013).

### **Fraud or Corruption**

It is never permissible to offer anything of value for corrupt purposes, such as obtaining favorable treatment with a respective beneficiary or partner. CRS prohibits Fraud whose definition within the framework of Fraud Allegation Management (FAM) procedure is: "An act or course of dishonesty, an intentional concealment, omission, or perversion of truth, to gain unlawful or unfair advantage, induce another to part with some valuable item or surrender a legal right, or inflict injury in some manner." The examples of fraud are bribery, kickbacks and gratuities, collusive behavior between vendors and employees, false claims, embezzlement, and the types of theft that are the direct or indirect result of fraudulent actions.

CRS prohibits employees from offering, soliciting, or accepting any bribe, whether dealing with government officials, political parties, or representatives of commercial organizations. "Bribery" does not mean just money, but anything of value; including gifts, entertainment, or other favors solicited or received for an improper purpose. This same integrity is expected from all third parties, agents, and any other partner.

### **Compliance with the U.S. Foreign Corrupt Practices Act (FCPA):**

CRS complies with the United States Foreign Corrupt Practices Act (FCPA). The FCPA prohibits agencies and individuals from corruptly offering, promising or giving anything of

value to a Foreign Official\* to assist the agency or individual in obtaining or retaining business or to obtain any improper advantage. It is also unlawful for any CRS employee to make payments to agents, sales representatives or other intermediaries while knowing or having reason to know that any portion of the payment will be used illegally. Unlawful political contributions to obtain or retain business operations overseas are prohibited.

Due diligence should be conducted on all third parties that CRS seeks to engage to act as agents, representatives or consultants in connection with business in a foreign country and foreign controlled partner agencies that CRS intends to establish a binding business relationship with. Due diligence should be conducted prior to entering into any contractual or binding arrangement, with advice from General Counsel. Neither CRS nor any Employee or Affiliate in service to CRS shall offer, make, promise or authorize payments to Foreign Officials, directly or indirectly, which would violate the FCPA, or similar national anti-bribery laws.

For more information regarding conflict of interest, fraud or corruption, refer to the following:

- [Conflict of Interest Policy](#) (Conflict of Interest, POL-HRD-GEN-0002).
- [Whistleblower Policy](#) (Whistleblower -Anti-corruption, POL-HRD-GEN-0018).
  - [Fraud Allegation Management procedure](#) (Fraud Allegation Management (FAM) procedure, PRO-OOD-RSK-001).
  - [The Foreign Corrupt Practices Act](#) (The Foreign Corrupt Practices Act, United States Department of Justice).

## PROCEDURES

### Acknowledgement and Acceptance

All persons bound by this Code of Conduct and Ethics (see “Scope” above) are obligated to acknowledge their awareness of its content and accept it as a binding obligation during their CRS service or employment as follows:

- a) New CRS employees and affiliates will execute an [“Acknowledgement and Acceptance”](#) statement at the time of their hiring, and all CRS employees and affiliates will execute an “Acknowledgement and Acceptance” statement at the time of their biennial refresher training.
- b) CRS corporate Board Directors and CRS Foundation Board Directors will annually execute an “Acknowledgement and Acceptance” statement concurrent with the submission of their Conflict of Interest declaration.

### Training

All employees are required to complete the compliance training on the Code of Conduct and Ethics, with refresher courses every two years.

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\* “Foreign Official” includes: a) an officer or employee of any non-U.S. federal, state, municipal, or other government, department, agency, or instrumentality; b) a political party or party official; c) a candidate for a foreign political office; d) an officer or employee of: • a public international organization or any department or agency thereof, e.g., United Nations, World Bank, IMF, • an organization that is affiliated with one or more foreign governments, • a commercial business, enterprise or other organization that is owned or controlled by a foreign national, regional or local government; e) a consultant, advisor, contractor, or agent of any of the above that represents or acts on behalf of or in an official capacity for such entity or person; or f) members of foreign royal families that have governmental duties.



Human Resources shall be responsible for the design of the training and refresher courses, releasing the training to all staff through CRSLeads, and tracking compliance.

Country Programs shall ensure the timely completion of the training by all employees.

### **Raising complaints**

All persons included in this policy's Scope #1, #2 and #3 are required to report whenever they suspect or witness a violation of the standards outlined in this Code of Conduct and Ethics. Failure to report may put the agency and employees at risk, and lead to disciplinary action, up to and including termination. Reporting is an effective way of prevention and response to actual or perceived misconduct.

CRS shall investigate and follow up on reported incidents in a thorough, confidential and responsible manner.

Potential breaches or any violations of the Code of Conduct and Ethics shall be reported in accordance with the confidential [Whistleblower Policy](#) procedures (Whistleblower (Anti-corruption) policy, POL-HRD-GEN-0018) by:

- Submitting an online report on our secure and confidential website at [www.ethicspoint.com](http://www.ethicspoint.com)
- Calling the hotline: 1 -866-295-2632. Country specific access codes are available on ethics point site.

Abuse or exploitation of children or vulnerable adults shall be reported in accordance with the [Policy on Safeguarding](#) (external link) or [Policy on Safeguarding](#) (link for internal staff) by:

- Submitting an online report form on Navex Global: [English](#) [Español](#) [Français](#)
- Calling the hotline: 1 -866-295-2632. Country specific access codes are available on [protection website](#).

Violations of the Code of Conduct and Ethics may also be reported by contacting any of the following designated staff or officials:

- General Counsel
- Director of Internal Audit
- Director of Human Resources at Baltimore HQ
- Country Representative in your Country Program
- A member of U.S. congress or representative of congressional committee, a cognizant U.S. Inspector General, the U.S. government Accountability Office, a Federal employee responsible for contract/grant oversight or for investigating misconduct, and a U.S. court or grand jury (Only for violations related to a Federal contract or grant - including the competition for, or negotiation of, a contract or grant relating to U.S. government grants or contracts).

In some circumstances, CRS may be obligated to disclose certain violations to the U.S. Government. This obligation is triggered when there is "credible evidence" of certain criminal violations involving fraud under title 18 of the U.S. Code or civil violations of the False Claims Act. The obligation is also triggered when there is credible information relating to trafficking in persons by CRS or an employee, contractor, vendor, or agent. A CRS employee, contractor, or vendor who becomes aware of potential evidence of such violations should immediately report that information in accordance with the above procedures either by directly contacting one of the individuals identified above, or alternatively by submitting an online report at [www.ethicspoint.com](http://www.ethicspoint.com) or calling the hotline 1 -866-295-2632.

## **Non-retaliation**

A CRS employee will not be discharged, demoted, or otherwise discriminated against as a reprisal for reporting any suspicions or for "whistleblowing." Whistleblowing is defined as making a disclosure "that the employee reasonably believes" is evidence of any of the following:

- Gross mismanagement of assets, property, funds, contract or grant;
- Inaccurate, false, or misleading financial records or documentation;
- A gross waste of agency funds;
- Abuse of authority and power for exploitation and abuse of beneficiaries or others that we serve;
- A substantial and specific danger to public health or safety;
- Abuse or exploitation of a child or vulnerable adult; or
- Any violation of CRS' Code of Conduct and Ethics.

## **CONSEQUENCES**

All Employees and Affiliates are obligated to act with integrity and are responsible for adhering to the standards of this policy.

Any breach or violations of this Code of Conduct and Ethics may result in disciplinary action up to and including termination. Violations may also result in criminal and civil charges in the United States or abroad, with significant penalties if an employee and/or the agency is convicted. Violations and charges have serious implications on the agency's operations.

## **RELATED POLICIES AND DOCUMENTS**

1. [Policy on Safeguarding](#) (external link); [Policy on Safeguarding](#) (link for internal staff)
2. [Anti-Trafficking in Persons Compliance Plan](#)
3. [Social Media Policy](#) (CRS Social Media Policy, POL-HRD-GEN-0015).
4. [Equal Employment Opportunity Policy](#) (Equal Employment Opportunity, POL-HRD-EMP-0019).
5. [Drug-Free Workplace](#) (Drug-free Workplace, POL-HRD-GEN-0008).
6. [Substance Abuse](#) Substance Abuse, POL-HRD-GEN-0007).
7. [Smoking](#) (Smoking, POL-HRD-GEN-0004).
8. [Workplace Conduct](#) (General Workplace Conduct, POL-HRD-GEN-0009)
9. [Dismissal for Cause](#) (Dismissal for Cause, POL-HRD-EMP-0017)
10. [Finance Policies Site](#)
11. [Transaction documentation](#) (Transaction Documentation Policy, POL-FIN-DOC-008).
12. [Finance Ethics Procedure](#) (Code of Finance Ethics Procedure, PRO-FIN-ETH-003).
13. [Global Procurement manual and policies](#) (Approved Supplier List policy, POL PUR SUP 001; Procurement Policy Executive Summary, POL-PUR-SUM-001; Procurement Contracts, POL-PUR-POS-001; return procedure, PRO-PUR-RETURNS Procedure).
14. [Consultants \(Independent Contractors\) Policy](#) (Consultants/Independent contractors, POL-HRD-EMP-0004).
15. [Parties and Gifts](#) (CRS Funded Parties and Gifts, POL-HRD-GEN-0013)
16. [Conflict of Interest Policy](#) (Conflict of Interest, POL-HRD-GEN-0002).
17. [Whistleblower Policy](#) (Whistleblower -Anti-corruption, POL-HRD-GEN-0018).

18. [Fraud Allegation Management procedure](#) (Fraud Allegation Management (FAM) procedure, PRO-OOD-RSK-001).
19. [The Foreign Corrupt Practices Act](#) (The Foreign Corrupt Practices Act, United States Department of Justice).
20. [Caritas Internationalis Code of Ethics](#) (Striving to live our values: Code of Ethics for Caritas Internationalis member organizations).
21. [Code of Conduct and Ethics Acknowledgement Form](#)

## Catholic Relief Services (CRS) Policy on Safeguarding

<b>Applies to:</b>	<b>All Staff, Board Directors, Affiliates, Visitors (Worldwide), (hereinafter referred to as “CRS Team Members” in this policy) and, Partners, Suppliers, and Service Providers-including Consultants (hereinafter referred to as “CRS Associates” in this policy)<sup>1</sup></b>
<b>Sponsor:</b>	<b>EVP, Global People Resources (GPR)</b>
<b>Created On:</b>	<b>June 1, 2020</b>
<b>Approved Revision:</b>	<b>March 15, 2023</b>
<b>Expiration Date:</b>	<b>March 15, 2026</b>

### **I. Purpose:**

1. Safeguarding is the responsibility that all organizations have to ensure that their programs<sup>2</sup> and staff, and those engaged by, in service to, or associated with the organization<sup>3</sup> honor and protect the rights and dignity of all people—especially children and vulnerable adults—to live free from abuse and harm. Safeguarding includes preventing, reporting, and responding to harm caused by those employed by, in service to, or associated with CRS.
2. At CRS, this responsibility is paramount, given that safeguarding is integral to preserving and upholding the dignity of all human life and fostering and promoting social justice. This responsibility is firmly rooted in the mission and values of the Catholic Church and the belief that each individual has an equal and unique worth created in the image and likeness of God.
3. Safeguarding is fundamental to our identity as a humanitarian and development organization, given our commitment to protecting, empowering – and accountability to – those we serve and those with whom we work.
4. CRS recognizes that children – defined as anyone under the age of 18 – have increased vulnerabilities to violence, abuse, and exploitation due to their dependence on others and unequal power with adults. CRS is committed to child safeguarding and works to ensure that it is a child-safe organization.<sup>4</sup>
5. CRS is committed to creating and maintaining an environment – in our workplaces, in our programs, and in the communities within which CRS works,<sup>5</sup> that promotes our core values. This means, in practice, creating and maintaining a culture of integrity, safety, accountability, respect, and inclusion, and actively working to prevent abuse and harm.<sup>6</sup>

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<sup>1</sup> In the event that there appear to be conflicting provisions between this Safeguarding Policy and the Partner Safeguarding Policy and Procedure (PSPP) and/or CRS’ Supplier and Service Provider Code of Conduct applicable to CRS Associates, the latter govern and shall be the standard of conduct expected of them.

<sup>2</sup> Programs in this policy are also meant to include/encompass projects.

<sup>3</sup> This includes all CRS Team Members and CRS Associates.

<sup>4</sup> See Definitions in Annex 1 for the definition of a “child-safe organization.”

<sup>5</sup> See Definitions in Annex 1 for the definition of “community in which CRS works.”

<sup>6</sup> [CRS’ Respect, Equity, Diversity, Inclusion \(REDI\) principles and behavioral competencies](#) are foundational to a safeguarding culture.

## II. Scope

6. **The CRS Safeguarding Policy applies to all CRS Team Members. Specific roles and responsibilities of CRS Team Members to operationalize this policy and create a safeguarding culture are detailed in Annex 2 of this policy.**
7. CRS is committed to working only with partners, suppliers, and service providers, including consultants (“CRS Associates”), who are equally committed to the safety and dignity of individuals, and who are vigilant about preventing, reporting, and addressing prohibited behaviors as outlined in this policy. As such, this policy also applies to CRS Associates with specific requirements detailed in Section V. *Partners, Suppliers, and Service Providers* of this policy.<sup>7</sup>
8. Whereas many CRS policies vary across regions—contextualized to locations and cultures—the CRS Safeguarding policy is globally binding. As such, CRS Country Programs and outreach offices are responsible for ensuring the review of CRS’ Safeguarding Policy against national law, raising and resolving issues with CRS’ Director of Safeguarding, and incorporating the policy into their local employment manuals.
9. This policy applies to CRS Team Members’ and CRS Associates’ activities and behaviors at work, outside work, and while on leave; it applies in all locations and at all times, on or off duty, to all CRS Team Members and CRS Associates while engaged by/associated with CRS, visiting CRS programs or country offices, or employed (in paid or unpaid work) by CRS.

## III. Conduct between CRS Team Members, and between CRS Team Members and CRS Associates<sup>8</sup>

10. CRS Team Members and CRS Associates’ staff are expected to treat each other with respect and dignity, so as not to create a hostile working environment. The following behaviors are prohibited in the workplace/between CRS Team Members and CRS Team Members and CRS Associates:<sup>9</sup>
  - a. Harassment
  - b. Bullying
  - c. Sexual Misconduct, which includes:
    - i. Sexual Assault
    - ii. Sexual Harassment<sup>10</sup>

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<sup>7</sup> In the event that there appear to be conflicting provisions between this Safeguarding Policy and the Partner Safeguarding Policy and Procedure (PSPP) and/or CRS’ Supplier and Service Provider Code of Conduct applicable to CRS Associates, the latter govern and shall be the standard of conduct expected of them.

<sup>8</sup> CRS strongly encourages CRS Associates’ offices to prohibit this conduct. CRS, however, will not investigate internal office dynamics in CRS Associates’ offices, but if serious allegations arise, CRS reserves the right to consider remedies up to and including termination of the working relationship with the CRS Associate in line with relevant legal standards.

<sup>9</sup> See Annex 1 for specific definitions of prohibited behaviors. CRS Team Members and CRS Associates’ staff are also prohibited from engaging in this conduct with other aid workers and CRS reserves the right to investigate allegations of same with CRS Team Members. Additionally, CRS will consider remedies, in line with relevant legal standards, up to and including termination of the working relationship, should a staff member of a CRS Associate be found to be engaging in such conduct.

<sup>10</sup> If CRS Team Members and CRS Associates’ staff engage in any form of abuse, attempted abuse, or exploitation of any kind in or outside the workplace CRS reserves the right to investigate allegations of same with CRS Team Members. Additionally, CRS will consider remedies, in line with relevant legal standards, up to and including termination of working with the CRS Associate should this occur by one of their staff.

## **Sexual and Romantic Relationships in the Workplace between CRS Team Members and between CRS Team Members and CRS Associates' Staff<sup>11</sup>**

11. Although romantic/sexual relationships in the workplace are not prohibited, such relationships must be entirely consensual and entered without any form of coercion, exploitation, or abuse of rank, position, or power and not impact professional duties or the working environment.
  - a. Because of the inherent power differences between persons in a supervisory, managerial, or leadership position and those who report to them (directly or indirectly through their line management), romantic or sexual advances by a supervisor, manager, or leader towards a direct report or someone in their line management will be viewed by CRS with concern.
  - b. CRS strongly encourages all CRS Team Members to report their romantic/sexual relationships with other CRS Team Members or with a CRS Associates' Staff to GPR ([Regional People Officer/HRBP](#)).<sup>12</sup> However, when a romantic/sexual relationship involves a leader, supervisor, or manager and a direct report or anyone in their line management, both CRS Team Members are required to report the relationship to their (next level) supervisor and GPR ([Regional People Officer/HRBP](#)) as soon as possible.<sup>13</sup> This reporting is confidential and is meant to protect the CRS Team Members involved, and to ensure that perceptions of potential misconduct (including conflicts of interest and perceived preferential treatment) can be addressed before they arise.
  - c. Relationships between CRS Team Members and between CRS Team Members and CRS Associates' staff that are not formally disclosed and that involve a manager, supervisor, or leader with a direct report or anyone in their line management or that may entail an actual or potential conflict of interest<sup>14</sup>, may be investigated as a breach of the requirement to disclose under this policy, as potential sexual misconduct, or as a potential breach of the [Conflict-of-Interest Policy](#).<sup>15</sup>

## **Labor Practices of CRS Team Members and CRS Associates<sup>16</sup>**

12. All CRS Team Members and CRS Associates are prohibited from employment practices related to human trafficking at all times, including, but not limited to:

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<sup>11</sup> Adapted from Mercy Corps Sexual Misconduct in the Workplace Policy and Church World Service (CWS) Code of Conduct Policy.

<sup>12</sup> Mandatory disclosure is required if the relationship presents an actual or perceived [Conflict of Interest](#). This disclosure is meant to protect staff from allegations of impropriety that may arise and will be strictly confidential. In the case of a relationship between a CRS Team member and a CRS Associate, the CRS Team Member is encouraged to report the relationship, and the CRS Team Member must report the relationship if there is a direct or indirect supervisory role or possible conflict of interest. The CRS Associate is not required to report the relationship to CRS. Any disclosures should be made using the [Workplace Relationship Disclosure Form](#), which is added to the staff member's personnel file.

<sup>13</sup> Disclosures should be made using the [Workplace Relationship Disclosure Form](#), which is added to the staff member's personnel file.

<sup>14</sup> Including where the CRS Team Member participates in contracting the CRS Associate or may be perceived to or actually influence the contracting process. The CRS Associate is not required to report the relationship to CRS; the CRS Team Member is.

<sup>15</sup> CRS Team Members are encouraged and welcome to speak to the Director of Safeguarding confidentially for guidance on disclosure, including where there are sensitive cultural issues or laws that cause concern for those disclosing.

<sup>16</sup> CRS reserves the right, in line with local legal standards, to terminate contracts with CRS Associates who do not abide by labor practices set out in this policy.

- a. Destroying, concealing, confiscating, or otherwise denying access to a CRS Team Members'/CRS Associates' immigration, travel, or personal identification documents.
  - b. Using misleading or fraudulent practices to recruit CRS Team Members'/CRS Associates' such as failing to disclose key terms and conditions of employment or charging applicants recruitment fees.
  - c. Using recruiters that do not comply with local labor laws or charge applicants' recruitment fees.
  - d. Failing to provide return transportation to any CRS Team Member/CRS Associate specifically brought to a country for the purpose of working on a program.
  - e. Providing or arranging housing that fails to meet host country housing and safety standards.
  - f. Failing to provide a valid employment contract or work document where required.
13. CRS Team Members and CRS Associates are also prohibited from knowingly obtaining work-related goods or services that have been provided or produced by trafficked or forced labor.
14. CRS Team Members are prohibited from employing children under the age of 18 for any role in CRS' workplace and prohibits the funding of programs in which children under 18 are working/employed.
15. CRS Team Members are otherwise prohibited from hiring children under the age of 15 for any personal/non-workplace related tasks regardless of any perceived benefit to the child or the child's family. If a child is under the age of 18, tasks for which the child is hired should not include work that is mentally or physically dangerous or hazardous and/or interferes with their schooling (See the Child Safeguarding section).
16. CRS Associates are expected not to exploit/benefit from a child or forced labor and are expected to respect the basic social rights and working conditions in the countries in which they work, as well as international standards with respect to child labor.
17. In this regard, CRS Associates are prohibited from employing children under the age of 18 in mentally or physically dangerous or hazardous work or work that interferes with compulsory schooling. Further, CRS Associates are prohibited from employing children under the age of 15 in full-time work.

#### **IV. Conduct of CRS Team Members and CRS Associates with the Community within which CRS works**

18. CRS Team Members and CRS Associates are prohibited from engaging in all forms of:
- a. Exploitation
    - i. Sexual Exploitation
    - ii. Child Labor
    - iii. Human Trafficking
  - b. Abuse and attempted abuse
    - i. Sexual abuse
    - ii. Physical abuse
    - iii. Emotional abuse
    - iv. Neglect

With program participants, community members, and other persons in communities within which CRS works.<sup>17</sup>

19. In order to prevent sexual exploitation from occurring, CRS prohibits all CRS Team Members and CRS Associates from buying sex (prostitution) by offering money, gifts, or other material support in exchange for sex/sexual relations, regardless of the age or affiliation of the individuals selling sex, and regardless of whether prostitution or buying sex is legal or not.

### **Sexual and Romantic Relations between CRS Team Members and Program Participants/Community Members**

20. Sexual and romantic relations between aid workers and program participants (of any age) are prohibited and are grounds for termination. The only exception is a consensual, mutual relationship (where there is no abuse of power, rank, or position) between a local country CRS Team Member and a local adult program participant; in such a case, the CRS Team Member must fully disclose the relationship to their supervisor and to GPR ([Regional People Officer/HRBP](#)) at the outset of the employment (paid or unpaid) or the relationship.<sup>18</sup> This reporting is confidential and is meant to protect the CRS Team Member involved and to ensure that perceptions of potential misconduct can be addressed before they arise.

### **Child Safeguarding**

21. CRS is committed to conducting its programs and operations in a manner that is safe for children. CRS Team Members and CRS Associates must create and proactively maintain an environment that aims to prevent, deter, and lessen the risk of exploitation or abuse of children and report and respond when concerns and violations against children arise within their area of responsibility.
22. All CRS Team Members and CRS Associates are explicitly prohibited from knowingly engaging in any activity that they could have reasonably foreseen to result in any kind of harm, exploitation, or abuse of children.
23. All sexual and romantic activity with a child, defined as a person younger than 18 years of age, is considered sexual abuse and is prohibited in all places and at all times, both during and outside of working hours, regardless of the age of majority or consent locally. Mistaken belief in the age of a child is not a defense.
24. CRS specifically prohibits the use of corporal punishment in all its programs.

## **V. Partners, Suppliers, and Service Providers**

25. CRS will only partner with organizations, institutions, and entities that are equally committed to safeguarding.
26. Agreements between CRS and partners must include provisions requiring obligatory reporting to CRS of any allegations involving the trafficking of persons, exploitation, or abuse, including

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<sup>17</sup> CRS Team Members and CRS Associates must also not engage in harassment and bullying of program participants, community members, and other communities with whom and within which CRS works, and CRS reserves the right to investigate allegations of same as well as any of the prohibited behaviors set out in section IV of this policy.

<sup>18</sup> Relationships between a local country program CRS Team Member and a local adult program participant should be disclosed using [Workplace Relationship Disclosure Form](#), which is added to the staff member's personnel file. Further action may be necessary, i.e., where a Conflict of Interest is also present (please see the [Conflict of Interest Policy](#)) but will be at the discretion of the Country Representative and Human Resources.



sexual exploitation and abuse, that pertain to programming or staff funded by CRS, or allegations that are not directly related to the programming or staff funded by CRS but could be reasonably expected to impact the relationship between the partner and CRS, or the reputation of the partner or CRS.<sup>19</sup>

27. All suppliers and service providers must sign CRS' Supplier and Service Provider Code of Conduct and adhere to any safeguarding specific terms and conditions within the supplier or service provider contract.
28. Partners, Suppliers, and Service Providers, subject to the Partner Safeguarding Policy and Procedure (PSPP), must also comply with the requirements set out within it.
29. Consultants must sign CRS' Safeguarding Policy included in the Consultant Contract Agreement and adhere to safeguarding specific terms and conditions within the consultant contract.

## VI. Reporting

30. All CRS Team Members and CRS Associates are obligated to report any concerns or suspicions of prohibited behavior as detailed and defined in Annex I of this policy involving CRS Team Members, CRS Associates, or aid workers associated with another organization. The concern or suspicion may be a result of witnessing the incident, being told of it, hearing about it directly or indirectly, or being the object of it.<sup>20</sup> Failure to report may result in disciplinary action, up to and including termination, for CRS Team Members, and may result in the termination of contracts or association with CRS Associates.
31. All such required reporters should report all concerns through any of the following channels within 24 hours of receiving the concern:
  - Global People Resources (Baltimore, region, or country program) – verbally or in writing
  - Their supervisor - verbally or in writing
  - CRS Country Representative - verbally or in writing
  - The safeguarding designates in the Country Program or HQ Department<sup>21</sup> - verbally or in writing
  - Regional team: Regional Director, Deputy Regional Director for Operations, Deputy Regional Director for Program Quality, Regional People Officer - verbally or in writing
  - Safeguarding Ethics Unit colleagues: Safeguarding Director, Safeguarding Advisors- verbally or in writing
  - The CRS Whistleblower site ([Ethicspoint](#)) where staff may submit an online report with the option of anonymity.
  - Email: [alert@crs.org](mailto:alert@crs.org)
  - Skype: 1-866-295-2632
  - Mail: (mark "Confidential")

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<sup>19</sup> These are the minimum CRS partner provisions on reporting; however, some donors may require broader reporting, i.e., to include workplace harassment. Therefore, partner reporting provisions may be more robust per specific donor requirements.

<sup>20</sup> The only exception is if a CRS Team Member or CRS Associate is a survivor of an incident and chooses not to report their own case.

<sup>21</sup> Country programs and HQ teams are encouraged to identify and communicate to all staff a safeguarding focal point for reporting following guidelines provided by Ethics Unit.

Attention:  
General Counsel  
Catholic Relief Services  
228 W. Lexington Street  
Baltimore, MD 21201

32. All recipients of safeguarding allegations (those listed in paragraph 31) must log the case onto the Whistleblower site ([Ethicspoint](#)) within 24 hours of occurrence or upon learning of the violation unless the allegation concerns Ethics Unit or Global People Resources staff.<sup>22</sup>
33. Allegations concerning Ethics Unit staff should be reported directly to the Global People Resources Director of People Operations. Any allegation concerning Global People Resources staff may be reported directly to the Safeguarding Director or the CEO. Any allegations concerning CRS Leadership may be reported to the Safeguarding Director or via [Ethicspoint](#).
34. If an allegation involves physical assault or includes an imminent threat to physical safety, country program leadership or CRS' Health, Safety, and Security Director may be the first point of contact (and should be involved as early as possible), prior to reporting on the Whistleblower site. For any allegations received through the Whistleblower site with significant health and safety concerns, CRS' Health, Safety, and Security Director will be consulted.
35. Reports of alleged safeguarding violations should include as much information as is readily available, such as:
  - Date, time, and location of the incident.
  - Nature of what happened.
  - Persons involved in, witnessing, or who have knowledge of the incident.
  - Any immediate help or actions required.
36. Intentionally false or malicious reporting is an abuse of the system and CRS resources and may result in disciplinary action, up to and including termination.
37. CRS is committed to ensuring that program participants and members of communities in which they live, are aware of acceptable CRS Team Member behavior and how they can raise any concerns or questions about CRS Team Member behavior in a confidential and secure manner. CRS will ensure communication is systematic throughout program planning; and accessible, child-friendly, community-based feedback and response mechanisms are established.

## VII. Investigation

38. CRS has zero tolerance for inaction on safeguarding allegations, which means all allegations will be promptly assessed and either referred to the appropriate agency (if an allegation involving another aid organization), investigated, or otherwise addressed as appropriate to the type of allegation raised. This includes the investigation of credible allegations of an egregious<sup>23</sup> nature pertaining to CRS Team Members no longer employed or engaged by CRS that occurred while employed by, working with, or engaged by CRS.

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<sup>22</sup> If unable to access the Whistleblower site, they should contact the Ethics Unit or Global People Resources.

<sup>23</sup> Egregious refers to those allegations that:

39. All CRS Team Members and CRS Associates are obligated to fully cooperate with an investigation. CRS is committed to investigations that are safe, confidential, timely, thorough, and professional, and in accordance with CRS' Safeguarding Allegation Management (SAM) Procedure.
40. The reporter and survivor (if not the reporter) will be notified of the steps taken to assess the allegation.<sup>24</sup> The survivor will also be provided with updates on the status of the case, as will the subject of the complaint.
- 41. Under no circumstances should any of CRS' Team Members or CRS Associates assess or investigate an allegation or a reported allegation on their own, outside of standard reporting protocols.**

## VIII. Confidentiality

42. CRS acknowledges and respects the courage and trust associated with reporting allegations of misconduct. To the extent possible, CRS seeks to maintain the confidentiality<sup>25</sup> of allegations, survivor/victim, reporter, witnesses, persons of knowledge, and subjects of complaint; understanding confidentiality can be critical to the safety/security, reputation, and well-being of all involved.
43. It is important for all reporters to understand, however, that CRS may be legally mandated to follow up on certain allegations (with donors or authorities in case of potential criminal offense) and that strict confidentiality cannot always be guaranteed due to the organization's moral and/or legal obligation to report and investigate.
44. CRS Team Members and CRS Associates involved in or otherwise aware of an investigation (including the reporter, the subject of the complaint, the investigator(s), and anyone interviewed as a witness or person of knowledge) have a duty to manage sensitive information in a manner that is respectful, professional, and that complies with applicable law, which may vary by location. CRS Team Members and CRS Associates must keep all information about any suspected or reported incidents strictly confidential and divulge information only to a designated investigator. Failure to maintain confidentiality may be grounds for disciplinary action, up to and including termination. The only exception is in instances where a survivor needs to disclose information to access necessary support and services.

## IX. Support to Survivors and Safety/Security

45. The support CRS provides to survivors will be in line with global ethical guidelines for timely, confidential, survivor-centered care that is responsive to the survivor's needs and

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1) were they to be substantiated, would otherwise result in serious disciplinary measures such as (but not limited to) termination; and/or

2) information available to the agency suggests that the alleged conduct has had a demonstrably detrimental impact on the survivor.

The Director of Safeguarding or their designate is responsible for determining if an allegation pertaining to a staff member no longer employed by the agency reaches the threshold of egregious.

<sup>24</sup> The reporter will have the complaint acknowledged and be informed that an investigation will take place and when it is closed. For confidentiality reasons, the reporter will not receive details of the outcome of the case.

<sup>25</sup> Confidentiality is distinct from anonymity. It means having restrictions on access to and disclosure of information, i.e., limiting the information and details to those who "need to know."

preferences, while fulfilling the organizational duty of care to CRS Team Members and those that we serve. CRS will prioritize protecting survivors from stigma, discrimination, retaliation, or other harmful consequences.

46. CRS will provide immediate and appropriate support to survivors of safeguarding incidents regardless of whether a formal internal response is conducted (such as an investigation). Support may include psychosocial support, a medical or legal referral, support to address safety and security concerns, and/or access to other support as needed and appropriate.
47. Further, in the case when CRS or the reporter believes that an investigation could put the reporter, survivor, witnesses, subject of complaint, or anyone else in danger or otherwise at risk of physical or psychological harm, CRS will take reasonable steps to protect and support those at risk.

## **X. Non-Retaliation**

48. Neither CRS nor CRS Team Members nor CRS Associates will retaliate—in the form of an adverse employment action or harassment—against any individual reporting an allegation with reasonable suspicions or participating in an investigation. Any form of retaliation is grounds for disciplinary action up to and including termination of employment or engagement.

## **XI. Adherence:**

49. Full compliance with this Safeguarding policy is expected of all CRS Team Members and CRS Associates. Failure to adhere to the provisions stated above may result in a range of actions and consequences, which could include (but are not limited to): verbal warnings, written warnings, mandatory training or counseling, suspension, and disciplinary sanctions up to and including termination of employment/ending of engagement/association with the individual, organization, entity, or institution. Serious misconduct such as (but not limited to) sexual abuse and exploitation, sexual misconduct, sexual or romantic relationships with a child, exploitation of a child, as well as persistent and severe forms of harassment and bullying are typically cause for immediate termination of employment or engagement by/association with CRS.
50. Knowingly facilitating or aiding another aid worker to perform acts of exploitation or abuse is strictly prohibited and will be addressed in the same manner as when a CRS Team Member or CRS Associate directly undertakes such an activity.
51. Depending upon the misconduct, context, and local laws, CRS may report allegations and CRS investigative findings to donors and local law enforcement authorities.

## **XII. Interpretation and Questions:**

52. Questions on the interpretation of this policy—and any other questions—can be directed to the Safeguarding Director.

## **Related Policy and Resources:**

- [Code of Conduct and Ethics](#)
- [CRS Whistleblower Policy](#)
- [CRS Whistleblower Site \(Ethicspoint\)](#)
- [CRS References for Employees Policy](#)
- [Conflict of Interest Policy](#)
- [Partner Safeguarding Policy and Procedure](#)
- [MEAL Policy and Procedures](#)
- [CRS Feedback, Complaints, and Response Mechanism Guidance](#)

**Key Words:**

Safeguarding, conduct, harassment, bullying, sexual harassment, sexual misconduct, abuse, exploitation, child labor, trafficking, survivor, confidentiality, investigation, retaliation

## Annex 1: Definitions

### Prohibited Behaviors

#### 1.1 Abuse:

A deliberate act of ill-treatment that can harm a person's safety, well-being, dignity, and development. It often involves individuals who have a relationship of responsibility and care for the survivor/victim, including program staff, parents, guardians, teachers, community workers, health-care providers, religious leaders, friends, or other children. Abuse may include:

- i. **Physical abuse:** non-accidental use of physical force that inadvertently or deliberately causes a risk of, or actual injury or suffering. Physical force includes but is not limited to hitting, shaking, kicking, pinching, pushing/pulling, grabbing, burning, female genital mutilation, torture, and other physical acts.
- ii. **Emotional abuse:** harm done by persistent or severe emotional ill-treatment or rejection, such as degrading punishments, threats, bullying, and not giving care and affection, resulting in adverse effects on the behavior and emotional state/development of an individual or child.
- iii. **Sexual abuse:** actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. All sexual and romantic activity with a child is considered sexual abuse.
- iv. **Neglect/Negligent treatment:** allowing for context and resources, the failure to meet the basic physical and/or psychological needs either deliberately or through the negligence of a child or individual under the responsibility of the perpetrator.

Neglect includes but is not limited to failing to provide adequate food, sufficient or seasonally-appropriate clothing and/or shelter; failing to prevent harm; failing to ensure adequate supervision; failing to ensure access to appropriate medical care or providing inappropriate medical treatment (e.g., administering medication when not authorized); or failing to provide a safe physical environment (e.g., exposure to violence, unsafe programming location, unsafe sleeping practices, releasing a child to an unauthorized adult, access to weapons or harmful objects, failing to child-proof a space that children will occupy, etc.).

#### 1.2 Attempted Abuse:

The intentional act of trying to engage in abuse, whether physical, emotional, or sexual abuse, but for some reason the abuse does not actually take place. It includes predatory behavior that makes it easier for an offender to use or obtain a child or vulnerable adult for sexual activity. Such behavior often involves building the trust of children and/or their caregivers, or a vulnerable adult, to gain access to them in order to sexually abuse them. For example, it includes attention paid to a specific child or adult, providing gifts, money, drugs, or alcohol to them, encouraging romantic relationships with them, or exposing them to sexual concepts through conversation or exposure to pornography.

#### 1.3 Bullying: is behavior that is:

- i. persistent, repeated, *and*
- iii. targeted

mistreatment of one or more persons by one or more perpetrators.

Bullying includes (but is not limited to) threats; intimidation; public humiliation/name-calling; persistent and unwelcome teasing; abuse or use of power to undermine, humiliate or denigrate; intentional work interference/sabotage; or stalking.

#### **1.4 Child Labor**

Child labor is work that deprives children of their childhood, potential, and dignity, and that is harmful to their physical and mental development. It includes work that is mentally or physically, socially, or morally dangerous and harmful to children and/or interferes with their schooling by:

- depriving them of the opportunity to attend school;
- obliging them to leave school prematurely; or
- requiring them to attempt to combine school attendance with excessively long and heavy work.

#### **1.5 Corporal Punishment**

Defined by the United Nations Committee on the Rights of the Child as “any punishment in which physical force is used and intended to cause some degree of pain or discomfort, however light.”

#### **1.6 Exploitation**

The abuse of power or trust to use a person for the benefit of another using force, coercion, abduction, deception, manipulation, or other means of abuse of trust or power. Exploitative behavior includes, but is not limited to, sexual exploitation, human trafficking, child labor, slavery, and child marriage/early and forced marriage.

#### **1.7 Harassment**

Refers to verbal or physical conduct or behavior that is:

- i. unwelcomed, *and*
- ii. targeted

that demeans, threatens, or offends and results in a hostile environment. General harassment is not sexual in nature and may consist of verbal, written, or physical conduct that insults or shows hostility or aversion towards an individual or group of individuals.

Usually, but not always, harassment is based on protected characteristics (race, color, religion, ancestry or national origin, sex, gender, age, marital status, sexual orientation, physical or mental disability or handicap, medical condition, protected veteran status, or genetic information and any other status protected by law).

A particular form of harassment is **stalking**, which is unwanted and/or repeated surveillance by an individual or group toward another person. Stalking behaviors are interrelated to harassment, bullying, and intimidation and may include following or monitoring the victim.

#### **1.8 Human Trafficking**

The recruitment, transportation, or receipt of persons by means of deception, coercion, threat, or force for the purpose of exploitation such as for labor, prostitution, or sexual exploitation.

## 1.9 Sexual Exploitation

Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another.

## 1.10 Sexual Misconduct (between CRS Team Members and between CRS Team Members and CRS Associates), which includes:

**i. Sexual Assault:** The term sexual assault refers to sexual contact or behavior that occurs without the explicit consent of the survivor. Some forms of sexual assault include attempted rape, rape, forcing a survivor to perform sexual acts, such as oral sex or penetrating the perpetrator's body. It may also include non-penetrative acts such as masturbation, kissing, rubbing, fondling, or unwanted sexual touching.

**ii. Sexual Harassment:** is a specific type of harassment which can cross age and gender boundaries and includes, but is not limited to, unwelcome romantic or sexual advances, requests for sexual favors, and other verbal or physical conduct of a romantic or sexual nature, where one of the following applies:

- a. Where submission to such conduct is made either explicitly or implicitly a condition of an individual's employment/assignment or reaction to such conduct by an individual is used as the basis for employment/assignment decisions affecting such individual; *or*
- b. Where the conduct has the purpose or effect of interfering with an individual's work performance or creating an intimidating, degrading, hostile, or offensive work environment.

Sexual harassment can happen in-person or by phone, email, through social media or other electronic communication.

## Other Definitions

**1.11 Affiliate** includes any US-based or overseas intern working in service to CRS over a period of time, whether paid or unpaid, including Global Fellows; university interns; secondees from other organizations, institutions, or entities; and others with a similar type of relationship to CRS.

### **Affiliate also includes:**

**1.11a. Volunteer,** A person who is not employed by CRS but who chooses, without remuneration, to contribute their time, skill, and knowledge to CRS' work. 'Volunteer' includes, but is not limited to, a volunteer in a CRS office, a 'community volunteer' who volunteers on behalf of their community to fulfill the community's responsibilities in an ongoing CRS program.

**1.11b. Incentive Worker** A person who is provided with an incentive (financial, food, or otherwise) to do tasks for CRS that have a temporary and voluntary character. Incentive workers may, for example, be people with refugee status, internally displaced peoples, returnees, or members of the host community who are working for CRS by doing tasks in return for incentives.



**1.12 Board Director** includes all members of the CRS Corporate Board and the CRS Foundation Board of Directors.

**1.13 Child** is anyone under the age of 18 years of age.

**1.14 Child-Safe Organization**<sup>26</sup>

A child safe organization consciously and systematically:

- Creates an environment where children’s safety and well-being are at the center of thought, values, and actions.
- Places emphasis on genuine engagement with and valuing of children and young people.
- Creates conditions that reduce the likelihood of harm to children and young people.
- Creates conditions that increase the likelihood of identifying any harm.
- Responds to any concerns, disclosures, allegations, or indications of harm.

**1.15 Community within which CRS works:** CRS uses a broad definition of this term to ensure that any individuals in the area where CRS works or has programs and who may be subject to power imbalances with CRS Team Members or CRS Associates are protected by this policy.<sup>27</sup>

**1.16 Consultant** is a specific category of service providers, are professionals who provide advice and other activities in an area of specialization. Consulting services generally fall under the domain of professional services as contingent work.

**1.17 CRS Associates** include CRS partners, service providers, and suppliers.

**1.18 CRS Team Members** include CRS Staff, Board Directors, Visitors, and Affiliates (paid or unpaid).

**1.19 Partner**, for the purposes of this policy, is defined as any entity formally engaged by CRS (Under a grant, sub-recipient agreement, or contract) that implements programmatic deliverables for the purposes of improving outcomes of vulnerable populations.<sup>28</sup>

**1.20 Service Provider** is an entity that provides services in exchange for payment, a term most frequently used for specific categories of businesses such as consulting, legal advice, contracted services providing security or cleaning, and telecommunications.

**1.21 Subject of Complaint** is a person who is alleged to have breached an article or articles of this policy.

**1.22 Supplier** is an entity that provides goods or services to another business or directly to the customer.

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<sup>26</sup> Adapted from Child Safe Organizations Project

<sup>27</sup> Adapted from World Vision: Partnership Management Policy: Child and Adult Safeguarding.

<sup>28</sup> Entities may be local non-profit; community-based, faith-based, or civil society organizations; international non-profit or for-profit; academic institutions; local or national government.

**1.23 Survivor** is a person who has experienced or has been exposed to a safeguarding concern. “Survivor” is preferred in the psychosocial support sector – in contrast to the term victim – because it implies resilience.

**1.24 Survivor-Centered Care** is care that is responsive to a survivor’s needs and preferences, and seeks to protect survivors from stigma, discrimination, retaliation, or other harmful consequences.

**1.25 Visitor** is any individual working in a CRS office or traveling with or on behalf of CRS or visiting CRS offices or programs regardless of their affiliation to the organization. A visitor refers to a range of persons, including, but not limited to, public and private donor representatives, university faculty, journalists, media, researchers, celebrities, politicians, family members, seminarians, and others with a similar association to CRS.

**1.26 Victim** is a person who has experienced or has been exposed to a safeguarding concern. “Victim” is a term often used in the legal and medical sectors.

**1.27 Vulnerable Adult** is an individual whose life circumstances (e.g., poverty, education), and/or as a result of discrimination based on physical or social characteristics (sex, gender, disability, age, ethnicity, religion, sexual orientation, etc.), has a reduced ability to withstand the adverse impact of external stressors.<sup>29</sup>

**1.28 Zero tolerance** implies all allegations are assessed, investigated as needed, and appropriate action is taken.

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<sup>29</sup> European Union. Humanitarian Aid definition.

## Annex 2: Roles and Responsibilities of CRS Team Members

### All CRS Team Members (as defined in this policy) are responsible to:

- Know, understand, and abide by the specific requirements of the policy, its specified standards and spirit, and engage in learning opportunities to develop knowledge of safeguarding concepts and responsibilities.
- Understand risks and signs of misconduct or breaches of CRS' Safeguarding Policy within their local context and area of work.
- Understand obligatory reporting requirements and immediately (within 24 hours) report all concerns and suspicions of safeguarding policy violations through established reporting channels (but should not, under any circumstances, investigate allegations).
- Apply a survivor-centered approach when observing or receiving an allegation of a safeguarding violation; respond to a survivor reporting a violation with respect and confidentiality.
- Complete safeguarding training within 45 days of being hired and complete assigned refresher safeguarding trainings.
- Cooperate fully with any safeguarding investigation and maintain complete confidentiality about the allegation(s) and the investigation(s).
- Not retaliate against anyone reporting a safeguarding violation or anyone participating in/providing information to a safeguarding investigation.

### CRS Management: Executives, Vice Presidents, Divisional Directors, Regional Directors, and their Deputies, Country Representatives/Managers, and Senior Management in all countries and areas where CRS operates are responsible to:

- Role models the standards of conduct and behavior required by this policy.
- Champion a culture of awareness and reporting about safeguarding through consistent messaging and by creating opportunities for additional learning.
- Ensure that allegations about breaches of this policy are taken seriously, treated confidentially, and immediately reported to the Ethics Unit through established reporting channels.
- Ensure that anyone who reports safeguarding allegations or participates in/provides information to safeguarding investigations does not face adverse employment decisions.
- Ensure that a survivor-centered approach is widely understood and consistently applied.
- Champion safe recruitment practices and the CRS reference policy.
- Champion a diverse and inclusive workforce that demonstrates capacity in [key safeguarding capabilities](#).
- Ensure that the performance management of staff supports an accountable and safe organizational culture to prevent all forms of misconduct under this policy.
- Ensure relevant [safeguarding capabilities](#) are included in staff performance and development plans, identify and share resources for learning, and coach staff to practice safeguarding behaviors across their areas of responsibility.
- Oversee the implementation of this policy and apply institutional learning to develop and improve upon strategies to prevent misconduct within their country/region/department/area of operation, including with partners and suppliers.

- Implement disciplinary/corrective action that is consistent and proportionate to substantiated allegations.
- Ensure that there are sufficient resources available across the organization to support the effective implementation of this policy.

**CRS Country Representatives/Managers are also responsible to:**

- Ensure the review of CRS' Safeguarding Policy against national law, raising and resolving issues, and clearly documenting the resolutions/adaptions with CRS' Director of Safeguarding and incorporating the policy into their local employment manuals.
- Ensure that referral pathways are up to date for their country's programs.
- Ensure that there are sufficient resources for safeguarding-related prevention and response within their country program, including appropriate staffing requirements and Community Feedback and Complaints Reporting Mechanisms (FCRM).
- Ensure that safe and accessible, child-friendly reporting channels exist, are closely monitored, and that they are known about, adapted to, and accessible to all relevant stakeholders within their country/region/department/area of operation.
- Ensure that CRS' partners comply with CRS' Partner Safeguarding Policy and Procedure.

**CRS Heads of Operations are also responsible to:**

- Ensure supplier/service provider compliance with CRS' Supplier Code of Conduct and Partner Safeguarding Policy and Procedure, including safeguarding related reporting requirements.
- Ensure consultants acknowledge and sign CRS Safeguarding Policy included in the Consultant Agreement.
- Ensure the application of safe recruitment practices and the CRS reference policy and procedures.

**CRS Heads of Programs are also responsible to:**

- Be aware of and create linkages to in-country prevention of sexual exploitation and abuse (PSEA)/safeguarding resources and referral networks.
- Oversee programming risk assessments for safeguarding and protection and ensure that a comprehensive risk mitigation strategy is developed, operationalized, and monitored across multiple areas of responsibility.
- Ensure that there are accessible, child-friendly feedback and complaints mechanisms in place for every program, adapted to communities' preferences and the context.

**CRS Program Managers are responsible to:**

- Consult with communities with whom CRS works (in a safe, accessible, and culturally appropriate way) to ensure that community members and those working on behalf of CRS are familiar with CRS' Code of Conduct and expected behaviors, how to raise complaints and concerns, and that CRS will act when misconduct happens.
- Clearly explain what goods and services the community members are entitled to and how they are selected.
- Conduct project-level safeguarding and protection risk assessments and implement comprehensive risk mitigation strategies.

- Monitor project-level safeguarding risks and adjust the mitigating measures as necessary.
- Ensure that there are accessible, child-friendly feedback and complaints mechanisms in place for every program, adapted to communities' preferences and the context. And that feedback and complaints are managed in an efficient and appropriate manner.

**Monitoring, Evaluation, Accountability, and Learning (MEAL) Managers are responsible to:**

- Ensure that appropriate escalation and management procedures are in place for community-based feedback and response mechanisms.
- Ensure confidentiality and triage of sensitive complaints.

**CRS Human Resources staff are responsible to:**

- Conduct safe recruitment for all CRS team members, meaning:
  - Conduct reference checks (professional and/or personal), inclusive of Global People Resources (GPR) approved safe recruitment questions on applicants (for paid and unpaid positions). Reference checks should include former supervisors whenever possible.
  - Include a requirement for applicants (paid or unpaid) to self-declare/disclose prior sexual or other misconduct and termination of past employment.
- Ensure awareness and application of the [CRS' Policy on Providing References for Current and Former Employees](#).
- Ensure all CRS new hires (paid and unpaid) receive an orientation on the Safeguarding Policy and acknowledge receipt of it upon hiring.
- Ensure and track that all CRS new hires (paid or unpaid) complete mandatory safeguarding training within 45 days of hire and refresher safeguarding training as assigned.
- Ensure that all job or role descriptions for all CRS Team Members– whether paid or unpaid, full-time or part-time, temporary or long-term – include a requirement to abide by CRS' Safeguarding Policy.
- Incorporate [safeguarding capabilities](#) in job descriptions and identify candidates in recruitment processes who demonstrate capabilities for all paid and unpaid positions.
- Ensure disciplinary/corrective action that is consistent and proportionate to substantiated allegations.

**The Ethics Unit/Safeguarding Team is responsible to:**

- Lead periodic reviews of this policy and ensure the policy and procedures are in-line with industry standards.
- Provide ongoing capacity strengthening to staff (paid and unpaid) to effectively implement this policy.
- Work with senior management across departments and in overseas operations on policy implementation and compliance.
- In-take and response to safeguarding reports and investigation of credible allegations, in-line with CRS' Safeguarding Allegation Management (SAM) procedures and international best practices and standards.
- Provide ongoing capacity strengthening to staff to respond to safeguarding reports.

- Effectively collaborate across departments and teams to strengthen CRS prevention efforts.

## CRS Policy on Social Media

<b>Applies to:</b>	<b>All CRS Staff, Interns, Fellows and Volunteers</b>
<b>Sponsor:</b>	<b>EVP, Global People Resources</b>
<b>Created On:</b>	<b>June 15, 2012</b>
<b>Approved Revision:</b>	<b>March 1, 2023</b>
<b>Expiration Date:</b>	<b>February 28, 2026</b>

### **Purpose:**

To encourage the use of technology in ways that are consistent with CRS Guiding Principles and to ensure the safety, privacy rights and human dignity of our staff, partners and beneficiaries, this policy and guidance clarifies employee responsibilities related to social media.

### **Scope:**

For this policy, CRS applies a broad definition of “social media” to mean websites and platforms upon which posted information is available or accessible to others electronically. This includes blogs, social networking sites (such as Facebook, Twitter, Instagram, LinkedIn, TikTok, Snapchat, etc.), message boards, comment feeds (e.g., on news sites), bookmarking/social news sites, and photo and video-sharing sites. Personal activity on social media includes actions such as posting content, “liking” other people’s posts, “following” organizations or pages, sharing links, belonging to online groups, and commenting on posts.

### **Policy:**

There are many benefits to CRS in being officially present in social media, and the agency’s profile on the web continues to grow. Aside from the official presence, many CRS staff make their CRS affiliation known on their personal blogs, Facebook profiles, and on other social media sites. While that association can be beneficial in raising the Agency’s profile, it can also be a risk if an employee’s personal communications or actions in social media reflect negatively on CRS.

To mitigate this risk, employees should adhere to the following terms of use:

#### **Social Media Terms of Use:**

1. Avoid posting, sharing, or disclosing information or views that might jeopardize the security and safety of any CRS program, staff, partners, or program participants. This includes critical comments about the government, culture, or program participants in the countries where CRS works or giving specific locations or travel plans about program activities and staff. Comply with CRS requests or requirements that certain topics not be discussed for confidentiality, security, or legal compliance reasons.
2. Do not disclose CRS’ confidential and proprietary information, including financial information, plans, strategies and proposals, without authorization, unless the data has been communicated publicly (i.e. on the CRS website) prior to the social media opportunity or advance approval is obtained.

3. Always be respectful to CRS staff, partners and program participants when posting online communications. The same policies that apply to conduct in the workplace apply to speech on social media, such as prohibitions on racial or ethnic slurs, vulgar language, obscenity, bullying, and threats of violence.
4. When posting photographs or videos on social media of other employees, program participants, partners, CRS worksites, and related activities and events, seek permission to do so from those in the photos or videos, or, when not possible, from someone in authority who can grant permission.
5. Staff should not use their CRS email address to register on social networks, blogs, or other online tools designed primarily for personal use.
6. Do not create CRS-branded Facebook pages, Twitter accounts, Instagram accounts, Snapchat accounts or other social/sharing accounts, or authorize any vendor, volunteer, agency, intern, etc. to do so. Instead, if there is a need for a social media account, speak to the CRS Baltimore Social Media team.
7. CRS does not actively monitor employees' use of social media. However, there are "trolls"—outside individuals and organizations who intend harm—that do monitor staff's social media accounts. You should use available privacy settings to control who can see the content you post online, though keep in mind that nothing on social media can be guaranteed to be private.
8. If staff identifies themselves as a CRS employee or mention their affiliation with CRS in their use of social media, staff must make it clear that they are speaking for themselves and not on behalf of CRS. Additionally
  - a. Notify their supervisor in advance if they plan to discuss their work with CRS on a blog or other web site. The Supervisor should review the site's content to ensure that it is consistent with CRS positions and values. Regardless, it remains the employee's responsibility to review and make appropriate judgments on content shared or linked to.
  - b. Do not say, support or advocate for anything that is contrary to any CRS policies or positions, or that is contrary to CRS values or Church policy.
  - c. Be aware that even in private communications, nothing can be kept entirely private. Much of it is easily found on a search engine such as Google. Even communications intended to be private can be forwarded to others and widely disseminated.
  - d. Be clear about their position and role within the organization, if identified as an employee or speaking on behalf or about the organization.
  - e. Ensure that social networking activity does not interfere with their work commitments, although promoting the good work of CRS is encouraged, if they wish to do so.
9. In accordance with Maryland law, CRS will not request or require staff to disclose any username, password, nor will CRS use other means for accessing a personal device or service through an electronic communications device.
10. This policy is not intended to prohibit or discourage you from engaging in legally protected activities such as discussing wages, benefits, or other terms and conditions of employment.

### **Responsibility:**

All CRS Staff are encouraged to seek guidance from a supervisor or Global People Resources if they have questions about appropriate personal use of social media. Conduct on personal social media at odds with Catholic teaching may influence some CRS employment decisions where legally allowed.



**Adherence:**

In general, employees should demonstrate good judgment in their use of social media and ensure that their communications are consistent with CRS values, principles, and policies.

**Interpretation and Questions:**

Questions on the interpretation of this policy—and any other questions—can be addressed to a [Global People Resources Business Partner, RPO](#), or Country HR manager.

**Related Documents:**

[ADVOCACY AND POLITICAL CAMPAIGNING](#)  
[GENERAL WORKPLACE CONDUCT POLICY](#)  
[CODE OF CONDUCT AND ETHICS](#)