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## CARE International Safeguarding Policy

### 1. Policy Statement

At CARE, we recognise our responsibility to promote human dignity and social justice within our organisation. At the heart of CARE's efforts to impact poverty and social justice is our engagement with marginalised communities. We place human dignity at the centre of our work. We are aware of the importance of organisational culture and accountability in enabling a safe and supportive environment for programme participants, the communities where we work, our staff, related personnel and our partners.

At CARE, we believe all people have a right to safety and to live their lives free from harm. This Safeguarding Policy is a response to CARE's commitment and recognition of our responsibilities to protect and safeguard people we work with, and who work for CARE, from any form of abuse, including sexual harassment, exploitation and abuse, physical and emotional abuse, neglect, and child abuse.

We recognise that there is unequal power between the people we work and partner with throughout our programs, and CARE Employees and Related Personnel. There is also unequal power of differing types within CARE. We are responsible for ensuring that we foster, and continuously build, an organisational culture of safety and accountability, and maintain a safe and respectful workplace, to ensure that power is not used to advantage or cause harm to anyone.

We know that some people are more at risk of abuse, due to social inequalities and vulnerabilities, in particular women and other vulnerable adults, and children. We take seriously our responsibility to keep children safe from harm and abuse, recognising the specific risks to children, and that abuse in all its forms, can have significant life-long consequences.

CARE has a zero-tolerance approach to all forms of abuse.<sup>1</sup> We make very clear that any form of abuse, perpetrated by our employees, related personnel, or partners, towards anyone, during or outside of working hours, in-person or online, will not be tolerated.

All CARE Employees and Related Personnel are required to report concerns of abuse. CARE wants to know when any CARE Employee or Related Personnel is not acting in accordance with our Safeguarding Policy and Safeguarding Code of Conduct. We take seriously all reports of sexual harassment, exploitation and abuse, physical and emotional abuse, neglect, and child abuse, and any other form of abuse or misconduct within CARE.

CARE will carefully examine and, where necessary, investigate reports of misconduct and act on its findings. Behaviour by CARE Employees and Related Personnel that contradicts this Policy, and the Safeguarding Code of Conduct, will be seen as a violation of this Policy. When a CARE Employee or Related Personnel has not acted in accordance with this Policy or the Safeguarding Code of Conduct, following an investigation, we will take disciplinary action up to, and including, dismissal. If required, and following risk assessment, we will also inform law enforcement and relevant authorities.

CARE has a survivor-centred approach to its safeguarding. This means that the needs and wishes of anyone who has experienced abuse (victims/survivors), by CARE Employees or Related Personnel, guide our response to reports and investigations, that victims/survivors are treated with dignity and respect, and the rights of victims/survivors to privacy and support are prioritised. Where the victim/survivor is a child we will take a child-centred approach. We also learn from the experiences of victims/survivors to inform our strategies and practices to prevent abuse from happening.

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<sup>1</sup> We will take disciplinary action, up to, and including, dismissal for any behaviours that are in breach of this Policy and the CI Safeguarding Code of Conduct.

## 2. Scope of Application

This policy applies to all CARE Employees and Related-Personnel:

- **CARE Employees** includes all employees of any CARE International entity: CARE International Secretariat, CARE International Members, Candidates, and Affiliates, and all offices under the responsibility of such CARE entities (i.e. regional/sub-regional offices, country offices, fundraising/advocacy offices), and wherever CARE has any form of engagement/activity;
- **Related Personnel** includes: board members, volunteers, interns, visitors, consultants, vendors, individual and corporate contractors, community volunteers and incentive workers. Related Personnel also includes non-CARE entities and their employees and individuals who have entered into partnership, sub-grant or sub-recipient agreements with CARE.<sup>2</sup>

This Policy and the Safeguarding Code of Conduct apply at all times, in-person and online, and during and outside work hours. Actions taken by CARE Employees and Related Personnel outside of working hours that are seen to contradict this Policy will be considered a violation of this Policy.

## 3. CARE's Safeguarding Commitments<sup>3</sup>

### Organisational Culture, Leadership and Accountability

- 3.1 CARE will create, promote and maintain a safe organisational culture for all people who work for and with CARE, including our partners, and the communities and program participants we work with.** CARE is committed to equality, diversity, and respect, and works to create an environment where it is safe to raise and address all concerns of abuse.
- 3.2 CARE will develop safeguarding strategies to prevent and respond to all forms of abuse.** We will dedicate capacity, budget and resourcing in all areas and locations of recognised need.
- 3.3 CARE will ensure high-level oversight and accountability around safeguarding and demonstrate its zero-tolerance approach to all forms of abuse.** CARE is committed to continuous learning and improvement to prevent and respond to all forms of abuse. We will do this through monitoring and reviewing the effectiveness of our safeguarding strategies and seeking feedback from CARE Employees and Related Personnel, partners, program participants and communities we work with. We will be transparent about sexual misconduct within CARE and be accountable and transparent in communicating our safeguarding efforts and learning to internal and external audiences, including our governance bodies, staff, donors, partners, the wider sector, CARE's programme participants and the communities where we work. All information shared will be informed by our survivor-centred approach and risk assessment.

### People Management<sup>4</sup>

- 3.4 CARE will only recruit and retain Employees, and only engage Related Personnel, who are aligned with our vision, mission, and values.** We will use robust safer recruitment practices for all vacancies, particularly for positions that will have direct or indirect contact with children and/or vulnerable adults. In compliance with applicable laws, we will prevent known perpetrators of sexual harassment, exploitation and abuse, physical and emotional abuse, neglect, and child abuse, from being hired or deployed in CARE, or elsewhere. We will

<sup>2</sup> Different considerations will arise regarding the enforcement of some of this policy and the principles for volunteers and incentive workers hired from communities with whom we work. While all forms of abuse and the misuse of humanitarian assistance will always be prohibited, as expressly set forth in this policy, discretion may need to be used in the application of the Safeguarding Code of Conduct regarding sexual relationships for this category of worker. See Annex A CARE's Safeguarding Code of Conduct.

<sup>3</sup> The commitments are based on, and further extend, the commitments defined within the Statement of Commitment Relating to Sexual Exploitation and Abuse by UN and non-UN Personnel, August 2008, which CARE endorsed.

<sup>4</sup> See safer recruitment guidance as per section 6 below for details on expected end-to-end employment practices within CARE.

include our commitment to zero-tolerance of all forms of abuse, and the responsibilities of all employees to safeguarding, within all vacancy notices, position descriptions and employment contracts/agreements(s), including a termination clause. Our leadership and management roles will have defined specific safeguarding responsibilities.

- 3.5 CARE will ensure all new Employees and Related Personnel are aware of, have signed, and are oriented to our Safeguarding Policy and Safeguarding Code of Conduct.** The Policy, Safeguarding Code of Conduct, and CARE's expectations on the prevention and reporting of sexual harassment, exploitation and abuse, physical and emotional abuse, neglect, and child abuse, will be incorporated into contracts/agreements and orientations.
- 3.6 CARE will raise awareness with, and provide training for, all Employees and Related Personnel on our Safeguarding Policy, Safeguarding Code of Conduct, and our multiple reporting mechanisms.** Trainings, (on-line or in-person), are provided to build on knowledge and refresh awareness. Leadership will actively encourage reporting of misconduct to management, human resources teams, and through our global hotline, CARE Line.
- 3.7 CARE will include safeguarding in performance management/feedback processes.** All employees will demonstrate their commitment towards safeguarding as part of their annual performance review. Leadership and management will demonstrate their efforts in creating and maintaining a safe, respectful, and inclusive environment as part of their performance reviews. Other Employees and Related Personnel may have specific duties relevant to this Policy which will also be recognised as part of their performance management.

## Partnerships

- 3.8 CARE will promote and require safeguarding with partners.** CARE will work with partners to evidence good safeguarding practice and will undertake safeguarding assessments as part of due diligence processes when considering new, and reviewing existing, partnerships. We will seek partners who share a commitment to social justice and equality, have compatible values and a similar approach to safeguarding their staff and program participants, as well as being suitable to fulfil shared programming interests. In addition to due diligence, we will include in our agreements/contracts with partners, and sub-grant/sub-recipients:
- a) our Safeguarding Policy and Safeguarding Code of Conduct;
  - b) an outline of reasonable due diligence and monitoring procedures of its sub-grantees/sub-recipients consistent with this Policy;
  - c) the appropriate language requiring such contracting entities and individuals, and their employees and volunteers to abide with a Code of Conduct that is pursuant to the standards of this Policy and Safeguarding Code of Conduct (where a partner doesn't have a policy that is consistent with CARE's, they may choose to adopt CARE's, or develop their own which meets CARE's standards); and
  - d) a statement that the failure of those entities or individuals, as appropriate, to take preventive measures against all forms of abuse including sexual harassment, exploitation and abuse, physical and emotional abuse, neglect, and child abuse, to investigate and report allegations in a timely manner, and to take corrective actions when any form of abuse has occurred, shall constitute grounds for CARE to terminate such agreements.
- 3.9 CARE will work with partners to co-create and jointly strengthen our shared safeguarding capacity, knowledge and skills to fulfil responsibilities consistent with this Policy.** With partners and local communities, we will jointly assess risks and co-create prevention and response strategies and approaches that are culturally and contextually appropriate. Capacity support will be included, where necessary, to ensure robust recruitment, safe programme implementation, and response and follow up to reports of abuse. Partners must complete annual refresher safeguarding training.
- 3.10 CARE will collaborate and work in partnerships on safeguarding.** We work with communities, other organisations, donors, governments, global civil society networks and local partners, to demonstrate

accountability, advance our practices, and contribute to wider efforts to prevent and respond to sexual harassment, exploitation and abuse, physical and emotional abuse, neglect, and child abuse.

### Embedding Safeguarding in our Programmes

- 3.11 CARE will undertake safeguarding assessments to identify risks of sexual harassment, exploitation and abuse, physical and emotional abuse, neglect, and child abuse.** Assessments must reflect local context and national laws and include risks, investigation feasibility and procedures, mitigation plans, and designated responsibilities and timeframes.
- 3.12 CARE will incorporate safeguarding measures into programs and throughout the project cycle.** We will do this through resourcing our strategies, and effective collaboration with our partners and programme participants, at all stages of design, implementation, monitoring, and evaluation in our programs. Wherever relevant, we will include child safeguarding in our programmes, recognising children often attend our programmes accompanying their parents, caregivers, or siblings.
- 3.13 CARE will ensure that multiple mechanisms for reporting sexual harassment, exploitation and abuse, physical and emotional abuse, neglect, and child abuse are accessible and sensitive to the differing needs and capacities of anyone wishing to report.** We will involve program participants in the design, monitoring and evaluation of local language feedback and accountability mechanisms. Where CARE works with children, we will ensure that child-friendly reporting mechanisms are available. CARE will raise community awareness on the expected behaviours of our Employees and Related Personnel, and how to report misconduct. Anyone responsible for receiving sensitive reports will be trained in how to respond, in a safe and confidential manner. We will be transparent with victim/survivors around any obligations or actions that may need to be taken in response to their report, including referral to third parties. All actions will be informed by our survivor-centred approach and will include an assessment of risk to all those involved.

### Response and Follow Up to Reports

- 3.14 CARE will provide support and assistance to anyone who has experienced sexual harassment, exploitation and abuse, physical and emotional abuse, neglect, or child abuse perpetrated by a CARE Employee or Related Personnel.** All CARE offices will map support services and referral pathways. Support options may include medical treatment, legal assistance, and psycho-social support. Our support and assistance will be informed by a survivor-centred approach, feasibility, and an assessment of risk to all those involved. Psycho-social support will also be available, if needed, to anyone who reports misconduct.
- 3.15 CARE will take all appropriate actions to protect persons from retaliation where allegations of sexual harassment, exploitation and abuse, physical and emotional abuse, neglect, or child abuse involving CARE Employees or Related Personnel are reported in good faith.** We will maintain confidentiality to protect anyone reporting in good faith and throughout investigations. CARE has a zero-tolerance approach to retaliation towards any person who reports misconduct.
- 3.16 CARE will ensure that all allegations of sexual harassment, exploitation and abuse, physical and emotional abuse, neglect, and child abuse by CARE Employees and Related Personnel are thoroughly examined, risk-assessed, and where needed, investigated and/or referred to another agency for investigation, or reported to law enforcement.<sup>5</sup>** CARE's investigations will be conducted in a timely, safe, and professional manner by those with appropriate training and experience in sensitive investigations and informed by gender-sensitive,

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<sup>5</sup> Before reporting to law enforcement, a comprehensive risk assessment must be carried out, based on the principle of 'do no harm' and no action should place the victim/survivor at risk of further harm.

child-centred, and survivor-centred approaches.<sup>6</sup> Investigations will include an assessment of risk to everyone involved. Where children are involved, investigations must only be conducted by a person trained and experienced in conducting child safeguarding investigations.

**3.17 CARE will take swift and appropriate action with any Employee or Related Personnel who violates this Policy or the Safeguarding Code of Conduct.** Actions may include administrative or disciplinary action, such as suspension, transfer to other duties whilst under investigation, or dismissal. Other actions may include legal action, and/or referral to the relevant authorities for appropriate action, including criminal prosecution in the abuser's country of origin as well as the host country. All actions will be informed by a survivor-centred approach and an assessment of feasibility and risk to all those involved. Each CARE office must have procedures for responding to and following up reports of misconduct based on their national employment and criminal laws.

#### **4. CARE's Safeguarding Code of Conduct<sup>7</sup>**

CARE's capacity to achieve its Vision and Mission relies on the individual and collaborative efforts of all CARE Employees and Related Personnel. To this end, all CARE Employees and Related Personnel must uphold and promote the highest standards of ethical and professional conduct and abide by CARE's codes of conduct and policies. This Policy defines the safeguarding conduct to be followed by all CARE Employees and Related Personnel to protect anyone, from any form of abuse, including sexual harassment, exploitation and abuse, physical and emotional abuse, neglect, and child abuse by CARE Employees and Related Personnel.

The Safeguarding Code of Conduct establishes the values, principles and behaviours that CARE Employees and Related Personnel are expected to commit and hold themselves accountable to, to make decisions that exemplify CARE's values and broader Code of Conduct, online and in-person, and during and outside work hours. Any violation of the Safeguarding Code of Conduct is a serious concern and may result in disciplinary action, up to and including dismissal, in accordance with disciplinary procedures of each CARE entity and applicable laws. All CARE Employees and Related Personnel must read and sign the Safeguarding Code of Conduct.<sup>8</sup> (See Annex A for the Safeguarding Code of Conduct).

#### **5. Responsibilities**

##### **5.1 All CARE Employees and Related Personnel**

All CARE Employees and Related Personnel share an obligation to prevent, report and respond to sexual harassment, exploitation and abuse, physical and emotional abuse, neglect, and child abuse. It is the responsibility of all CARE Employees and Related Personnel to uphold CARE's Safeguarding Policy and Safeguarding Code of Conduct, online and in-person, and during and outside their work hours. All CARE Employees and Related Personnel must read this Policy, sign the Safeguarding Code of Conduct, and undertake trainings and refresher courses on Safeguarding.

##### **5.2 Directors, Managers, Supervisors and Human Resource Managers**

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<sup>6</sup> Where the victim/survivor does not consent to participating in the investigation process, the decision to proceed, or not, must be assessed against the risk that the alleged perpetrator/subject of complaint may pose to others within CARE, our programme participants, and the communities where we work. Having assessed the risk and, if concluded that an investigation is required, the victim/survivor must be fully informed of this decision and every effort made to protect their identity. If it is not possible to proceed with an investigation due to risk to the victim/survivor, alternative actions may be also considered, such as monitoring closely the alleged perpetrator, moving them to a role that does not bring them into contact with vulnerable or at-risk communities and individuals, and conducting awareness raising activities to see if any further reports are made. All decisions must be comprehensively risk-assessed, documented and agreed with senior management. This is based on recognised sector-wide good practice, and from guidance in the CHS Foundation Paper '[Victim/survivor-centred approach to protection from sexual exploitation, abuse and harassment](#)' (2023)

<sup>7</sup> The Safeguarding Code of Conduct is based on, and further extends, the six Core Principles from the UN Secretary-General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13), and the UN Convention on the Rights of the Child (1989)

<sup>8</sup> Employees and individuals that have entered into partnership, sub-grant or sub-recipient agreements with CARE may instead sign their employer's code of conduct and standards if they are consistent with the commitments within the CI Safeguarding Policy.

Directors, Managers, Supervisors and Human Resource Managers must create a safe and accountable culture to prevent sexual harassment, exploitation and abuse, physical and emotional abuse, neglect, and child abuse. They must ensure that all CARE Employees and Related Personnel understand and comply with CARE's Safeguarding Policy and sign the Safeguarding Code of Conduct. Human Resource Managers are also responsible for robust safer recruitment, whilst Directors, Managers and Supervisors are responsible for ensuring employees have a thorough orientation, and ongoing awareness and sensitization to this Policy and Safeguarding Code of Conduct. Anyone in a management role must ensure that employees with specialised duties towards this policy have the appropriate experience, training, resources, and support available to them and that these duties form part of their performance management.

### **5.3 Country Directors/Representatives**

Country Directors or Representatives are accountable for safeguarding within the Country Office they manage and must plan and provide clear guidance and resources, for implementing, and reporting performance on, the Safeguarding Policy and Code of Conduct within their office(s), programs and projects. This includes taking swift action following investigations if it is determined that there was a violation of this Policy and Code of Conduct.

Country Directors, with support from respective Lead Members and CARE Member Partners, will ensure that safeguarding is sufficiently resourced. Country Offices must have trained safeguarding employees and/or focal points. Where the Country Office does not have dedicated Safeguarding personnel, Country Directors will ensure that adequate time by the focal points is dedicated to Safeguarding and the implementation of the commitments within this Policy.

### **5.4 National Directors of each CARE International Member and Affiliates<sup>9</sup>**

The National Directors of CARE Members and Affiliates are responsible for the resourcing and implementation of this policy and will provide overall leadership that demonstrates a safe and respectful organisational culture, with zero-tolerance towards any form of abuse. National Directors will ensure this Policy is reflected in their own codes of conduct and are responsible for defining and appropriately resourcing safeguarding strategies to uphold and operationalize this Policy. National Directors, in collaboration with relevant leadership teams, are also responsible for monitoring and reporting on performance against this Policy, including to their Boards.

National Directors of Lead Members will ensure that adequate support and resourcing is available to Country Offices, to fulfil this policy, including undertaking investigations, providing support to victim/survivors, and reporting on performance against this Policy.

### **5.5 CARE International Secretariat**

The CARE International Secretariat will coordinate oversight of this policy in collaboration with CARE Member, Affiliate and Candidate safeguarding/PSHEA focal points, and review and update the Policy according to the timeframe specified in this Policy. The CARE International Secretariat will monitor and report against this Policy utilising standardised data for global accountability.

### **5.6 CARE Boards**

All CARE Boards must have oversight of the CI Safeguarding Policy. Board Members are responsible for ensuring that adequate measures are in place to meet the commitments articulated in this policy. Boards must require from leadership regular reports on policy implementation and safeguarding risks to enable them to carry out their duties of providing guidance, oversight and accountability.

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<sup>9</sup> CARE Candidates remain under the overall responsibility of the respective CARE Member regarding this policy.

This Policy is also a response to CARE's accountability to the communities it works with and is therefore to be operationalized as part of the broader CARE International Accountability Framework.

## **6. Associated Policies, Protocols and Guidance**

This policy is complementary to the set of standards of behaviour that all CARE employees are required to adhere to in the:

- CARE International Code of Conduct and Code of Ethics
- CARE International Gender Equality and Inclusion Policy
- CARE International Stories and Images Consent Policy
- any further codes or related policies defined by the independent employers within CARE International - CARE International Secretariat, CARE International Members, Candidates, and Affiliates, and CARE International Regional and Country Offices.

The following protocols, guidance and resources are relevant to fulfilment of this policy:

- CARE International Protocol for handing SHEA-CA reports between CI entities
- CARE International Safer Recruitment Guidance
- CARE International Safer Programming Guidance
- CARE International Safeguarding Definitions
- CARE Academy Safeguarding training

For all relevant policies and resources, see CARE's internal knowledge management site, *CARE Shares – Safeguarding Hub* (only accessible to employees).

## ANNEX A – CARE International Safeguarding Code of Conduct<sup>1</sup>

CARE's capacity to achieve its Vision and Mission relies on the individual and collaborative efforts of all CARE Employees and Related Personnel. To this end, all CARE Employees and Related Personnel must uphold and promote the highest standards of ethical and professional conduct and abide by CARE's codes of conduct and policies. This policy defines the safeguarding conduct to be followed by all CARE Employees and Related Personnel to protect anyone, from any form of abuse, including sexual harassment, exploitation and abuse, physical and emotional abuse, neglect, and child abuse by CARE Employees and Related Personnel.

The Safeguarding Code of Conduct establishes the values, principles and behaviours that CARE Employees and Related Personnel are expected to commit and hold themselves accountable to, to make decisions that exemplify CARE's values and broader Code of Conduct, online and in-person, and during and outside work hours. Any violation of the Safeguarding Code of Conduct is a serious concern and may result in disciplinary action, up to and including dismissal, in accordance with disciplinary procedures of each CARE entity and applicable laws. All CARE Employees and Related Personnel must read and sign the Safeguarding Code of Conduct.<sup>2</sup>

As a CARE Employee or Related Personnel, **I will**–

1. create and maintain a safe and equitable organisational culture that prevents, opposes, and combats sexual harassment, exploitation and abuse, physical and emotional abuse, neglect, and child abuse.
2. treat everyone with dignity and respect and challenge attitudes and behaviours that contravene the CARE International Safeguarding Policy and Safeguarding Code of Conduct.
3. ensure that I am aware of the options available to me to report. I will immediately report any concerns I have regarding possible violations of CARE International's Safeguarding Policy and Safeguarding Code of Conduct, whether by a CARE Employee or by Related Personnel. When I report a concern or allegation, I will do so confidentially - I understand the need for respect, dignity and the safety of everyone involved. I understand that failure to report any concerns may lead to disciplinary action. I also understand that malicious reporting is a violation of the CARE International Safeguarding Policy and may lead to disciplinary action, up to and including dismissal.
4. maintain confidentiality about any concerns or information I am aware of and only share information with staff of the appropriate function who need to know such information. I understand that I am violating this policy if I carry out any investigations when this is not in my job description.
5. fully cooperate in any investigation where it has been alleged that I have acted in a way that is a violation of the CARE International Safeguarding Policy and Safeguarding Code of Conduct.
6. disclose to CARE any civil judgment or criminal conviction that relates to allegations made against me of sexual harassment, exploitation or abuse, physical and emotional abuse, neglect, and child abuse.
7. ensure there are always two or more adults present if I am ever responsible for planning, running or being present for activities involving children or vulnerable adults.<sup>3</sup> I will not be alone with program participants and will ensure another adult is within sight or hearing of programme activities.

<sup>1</sup> The Safeguarding Code of Conduct is based on, and further extends, the six Core Principles from the UN Secretary-General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13), and the UN Convention on the Rights of the Child (1989)

<sup>2</sup> Employees and individuals that have entered into partnership, sub-grant or sub-recipient agreements with CARE may instead sign their employer's code of conduct and standards if they are consistent with this Safeguarding Code of Conduct.

<sup>3</sup> The adults present can include a CARE employee, partner staff, carer, parent, or guardian of the child/vulnerable adult.

8. ensure that CARE Employees and Related Personnel are accommodated separately from anyone we are supporting through our programming.
9. only photograph, film or interview a child or vulnerable adult when explicitly tasked, as part of my role, using a CARE owned device, and with the approval of management. If explicitly tasked or it is in my role, I will fully inform myself of, and adhere to, all requirements in CARE International's Stories and Images Consent Policy.
10. protect, manage, and utilise CARE's financial and material resources appropriately. This means never using CARE resources, or personal devices, including computers, cameras, mobile phones, or personal or professional social media accounts, to exploit, groom or harass anyone. I am aware that this also means that it is prohibited to access, display or transmit offensive and/or pornographic material on any CARE-provided or subsidized electronic device (e.g., computer, tablet, phone) at any time, or on any personal electronic devices on a CARE network or in the workplace.
11. participate in all mandatory Safeguarding training(s).
12. abide by all applicable laws where I work, including child labour laws.

As a CARE Employee or Related Personnel, ***I will not***–

1. act in any way that violates CARE International's Safeguarding Policy or Safeguarding Code of Conduct, putting CARE's programme participants, community members, employees, partners, or related personnel at risk of harm or abuse.
2. sexually harass, exploit, or abuse anyone, understanding that these behaviours constitute acts of gross misconduct and are therefore grounds for disciplinary action, up to and including dismissal. This includes with CARE program participants or their family members, children, or others, either online or within the communities where CARE works. I am aware that such activity is prohibited, and in some cases, particularly where children are involved, is illegal. I understand that such activity is based on an improper use of my position and inherently unequal power dynamics and may undermine the credibility and integrity of CARE's work. I understand I must declare any previously existing relationships or activity with programme participants to my line manager or HR manager. I will seek guidance on this prohibition from appropriate management.<sup>4</sup>
3. engage in any form of sexual activity or develop physical/sexual relationships with children (persons under the age of 18) regardless of the age of consent locally. I understand that ignorance or mistaken belief in the age of a child is not a defence.
4. exchange, or imply the exchange of payment, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. I understand this means I will not exchange money, resources, or special favours/assistance for sex from anyone at any time.<sup>5</sup>
5. engage in a sexual or romantic relationship with a member of a community where CARE works, unless I am part of the same community, and the relationship has not arisen as part of my role with CARE. I understand that I must declare to management any sexual or romantic relationship I have with a member of the community or a staff member and that under no circumstances are any sexual activities with a child allowed.

<sup>4</sup> CARE sometimes engages community volunteers and incentive workers and recognises that in these circumstances there may be existing sexual relationships between such volunteers and incentive workers with other community members and program participants, including child marriage, that would violate this policy. Information and disclosure of existing sexual relationships/marriages must be made prior to appointment of community volunteers and incentive workers and if/when considering entering into a sexual relationship/marriage once already engaged with CARE. Confidential records must be retained by management.

<sup>5</sup> CARE does not make judgment about sex workers. However, it is a breach of the CI Safeguarding Policy and Code of Conduct if CARE Employees or Related Personnel exchange, or imply the exchange of money, employment, goods, or services in for sex, and/or sexual favours. CARE, on occasion manages programmes that hire sex workers because this can help us to reach the community. However, when these sex workers are representing CARE, they are prohibited from engaging in sex work.

6. support or take part in any form of sexually exploitative or abusive activities, or harmful practices including, for example, producing or distributing indecent images of children, human trafficking, Female Genital Mutilation, child marriage and forced marriage.
7. allow children into a private residence that are not accompanied by a parent/guardian/carer unless they are at immediate risk of injury or physical danger.
8. sleep near unsupervised children unless necessary, in which case I will seek my supervisor's permission, ensure the reason and permission is documented, and that there is another adult present.<sup>6</sup>
9. hire children for domestic or other labour, which is inappropriate given their age or developmental stage, and interferes with their time available for education and recreational activities or places them at significant risk of injury or exploitation.
10. use language or behaviour around or towards children, programme participants, community members, or CARE Employees and Related Personnel that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
11. place any person in unsafe conditions, including unsafe programme locations or unsafe structures.
12. do things of a personal nature for a child or anyone CARE is working with that they can do for themselves, including bathing and toileting.
13. engage in behaviour that physically punishes, shames, humiliates, belittles, or degrades a child or adult, or exposes any person to abuse or violence.
14. supply alcohol or other harmful substances to children or vulnerable adults.
15. take photographs, make films or audio recordings (interviews) of children and vulnerable adults in the course of my duties irrespective of the medium used, unless I am required to do so as part of my work duties and I have obtained documented approval from my manager along with informed consent from the subject.
16. send private messages to children or adults from the community I have met through my work with CARE unless I am from the community where CARE is working and am communicating with family members. If I must communicate with participants, I will do this only from a CARE owned device and with the knowledge of another CARE employee. If, under exceptional circumstances, I must communicate from a personal device, I will document and have approval by a manager.

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<sup>6</sup> This does not apply to the children of CARE Employees or Related Personnel.