

	<b>Policy Family:</b> Human Resources
	<b>Policy Name:</b> <a href="#">Safeguarding Policy</a>
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<b>Scope</b> This Safeguarding Policy and procedures document is mandatory and applies to all Habitat for Humanity Fiji staff, volunteers, affiliates, and trustees.	

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## A - Purpose

The Safeguarding Policy sets out to:

1. Increase understanding of safeguarding risks and define responsibilities for appropriate safeguarding behavior by all HFHF representatives, including but not limited to board members, staff members, contractors, interns, volunteers and implementing partners.
2. Confirm our commitment to include safeguarding principles during strategic and project planning, to assess and address the potential safeguarding risks associated with HFHF’s overall operations and project activities.
3. Establish processes for required safeguarding protocols during recruitment and training of HFHF representatives.
4. Define processes for HFHF representatives to report concerns regarding suspected safeguarding misconduct to promote a culture of accountability and transparency.
5. Establish standardised processes for investigating and managing reported allegations of safeguarding misconduct.
6. Reinforce HFHF’s zero-tolerance culture for any HFHF representative who violates safeguarding principles.

These ‘safeguarding’ principles (in conjunction with the HFHF Code of Conduct, Ethics Covenant, Community Based Feedback Mechanism, Fraud Policy, and Whistleblower Policy) guide our work as we strive to do good (and never harm) to each colleague, partner, beneficiary, and community member that we encounter while providing aid or promoting transformational and sustainable community development through housing.

### HFHFs Safeguarding Behavior Commitments

HFHF is opposed to any form of discrimination, exploitation, and abuse, including slavery, coerced conscription, prostitution, trafficking of persons for any purpose, vulnerable adult, or child abuse, and dangerous or exploitative child labour. In the design and implementation of programs and policies, we seek always to work without bias, to do no harm and to reduce (rather than contribute to) the consequences of discrimination, exploitation, and abuse.

**Remember these standards always apply, even when on leave or off duty.**

## B - Obligations

Everyone associated to HFHF must commit to respecting and safeguarding the rights and dignities of all people, and protect our staff members, volunteers, partners, beneficiaries, affiliates, research participants, and community members (especially vulnerable adults and children) from exploitation and abuse.

All HFHF Board and committee members, staff, volunteers, affiliates, and contractors must sign and comply with this HFHF Safeguarding Policy.

This includes the following general standards of professional behavior:

1. We will respect, promote, and safeguard the rights and dignities of all people (with particular attention to beneficiaries, vulnerable adults, and children) without discrimination or bullying of any kind.
2. We will treat all intended and actual beneficiaries with respect, courtesy, and dignity.

3. We will not engage in any form of humiliating, degrading, or use exploitative behavior toward beneficiaries in any circumstances.
4. We will not engage in any abuse of authority, position, or influence by withholding humanitarian assistance, manipulating selection, or targeting processes for beneficiaries.
5. We will not condone, endorse, or participate in any illegal activities conducive to theft, corruption, conflicts of interest, or other activities seeking illegal economic gains. (See the HFHF Fraud Policy and Code of Conduct Policy for further details.)
6. We will help to create and maintain an environment that prevents sexual exploitation and abuse, safeguards the rights of beneficiaries, research participants, and community members (especially vulnerable adults and children), and promotes the implementation of HFHF's Code of Conduct Policy. Managers at all levels have responsibilities to support and develop systems that maintain this environment. A significant failure to support and develop such systems will result in disciplinary consequences, up to and including termination.)

In addition, as an organisation, HFHF will consider safeguarding principles during strategic and project planning, to assess the potential safeguarding risks (especially to vulnerable adults and children) that are associated with our overall operations and project activities. In addition to any specific remedial actions identified after investigation of safeguarding misconduct allegations, the implementation of safeguarding activities will be assessed throughout the monitoring and evaluation of projects.

## C - Definitions

1. **HFHF Representative:** An individual acting on behalf of Habitat for Humanity Fiji, including board members, staff members, contractors, interns, volunteers, affiliates, and implementing partners.
2. **Target Populations:** Individuals or groups that the humanitarian activities of the respective disaster response program or humanitarian operations are intended to serve.
3. **Beneficiary:** An individual who applies to receive or who receives from HFHF (or its staff and volunteers) housing assistance or another form of protection, service, or other intervention.
4. **Child:** A child or children are defined as persons who have not attained 18 years of age.
5. **Vulnerable Adult:** A person over the age of 18 with a physical, mental or life status that causes vulnerability (such as a physical or mental disability).
6. **Harassment:** Any comment or behavior that is offensive, demeaning, humiliating, derogatory, or is otherwise inappropriate or fails to respect the dignity of an individual. It can be committed by or against a beneficiary, partner, staff, official, or any other person involved in any way in the disaster response program or humanitarian operation.
7. **Human Rights:** International standards that recognise and protect the dignity and integrity of every individual without distinction.
8. **Sexual Abuse:** Any actual or threatened physical intrusion of a sexual nature (including inappropriate touching), whether by force or under unequal power dynamics or otherwise coercive conditions.
9. **Sexual Exploitation:** Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including profiting monetarily, socially, or politically from the sexual exploitation of another.
10. **Sexual Harassment:** Any unwelcome sexual advance, comment, expressed or implied sexual demand, touch, joke, gesture, or any other communication or conduct of a sexual nature (whether verbal, written or visual) that occurs between a HFHF staff member and any person whom they interact in their HFHF role. For further details, see HFHF's Harassment, Bullying and Discrimination Policy.
11. **Child Abuse, Exploitation, or Neglect:** Constitutes any form of physical abuse; emotional ill-treatment; sexual abuse; neglect or insufficient supervision; trafficking; or commercial, transactional, labor, or other exploitation resulting in actual or potential harm to the child's health, well-being, survival, development, or dignity. It includes but is not limited to any act or failure to act which results in death, serious physical or emotional harm to a child, or an act or failure to act which presents an imminent risk of serious harm to a child.

12. **Child Labor:** Exploitive work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It refers to work that is mentally, physically, socially, or morally dangerous and harmful to children and interferes with their schooling.
13. **Child Emotional Abuse:** Constitutes injury to the psychological capacity or emotional stability of the child caused by acts, threats of acts, or coercive tactics. Emotional abuse may include humiliation, control, isolation, withholding of information, or any other deliberate activity that makes the child feel diminished or embarrassed.
14. **Exploitation:** Constitutes the abuse of a child where some form of remuneration is involved or whereby the perpetrators benefit. Exploitation represents a form of coercion and violence that is detrimental to the child's physical or mental health, development, education, or well-being.
15. **Child Neglect:** Constitutes failure to provide for a child's basic needs.
16. **Child Physical Abuse:** Constitutes acts or failures to act resulting in injury (not necessarily visible), unnecessary or unjustified pain or suffering without causing injury, harm, or risk of harm to a child's health or welfare, or death. Such acts may include punching, beating, kicking, biting, throwing, stabbing, choking, or burning. These acts are considered abuse regardless of whether they were intended to hurt the child.
17. **Child Sexual Abuse:** Any form of sexual abuse (discussed above), indecent exposure, or exploitation through prostitution or the production of pornographic materials, which involves a child.

## D - Policy

### 1 - Assessing Risk

1. HFHF will retain an organisational risk register which will identify potential Safeguarding risks to any stakeholder associated with the organisation and as part of the risk management of projects with HFHF partner organisations. Mitigation strategies will be included as part of this ongoing assessment. This will be reviewed regularly, and updates to policies and procedures will be made in line with these reviews.
2. HFHF will appoint a Safeguarding Officer who, with support from a cross-functional safeguarding team, will be responsible for monitoring the appropriate implementation of HFHF's Safeguarding Policy and overall safeguarding framework.

### 2 - Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH)

- i. HFHF takes a zero-tolerance approach to all forms of abuse and maintains an organisational culture that prioritises safeguarding against SEAH. HFHF will make it accessible for anyone affected to come forward and report incidents and concerns with the assurance they will be handled sensitively and appropriately.
- ii. Sexual exploitation, abuse, and harassment (SEAH) occurs when people in power exploit or abuse vulnerable populations for sexual purposes. All HFHF staff and representatives are prohibited from engaging in sexual exploitation or abuse and harassment:
  - (a) **Sexual exploitation:** Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including profiting monetarily, socially, or politically from the sexual exploitation of another.
  - (b) **Sexual abuse:** Any actual or threatened physical intrusion of a sexual nature, whether by force or under unequal power dynamics or otherwise coercive conditions.
  - (c) **Sexual Harassment:** Any unwelcome sexual advance, comment, expressed or implied sexual demand, touch, joke, gesture, or any other communication or conduct of a sexual nature, which an individual finds unwelcome, offensive, demeaning, humiliating, derogatory, or is otherwise inappropriate or fails to respect the dignity of an individual, whether verbal, written or visual, by any person to another individual. Sexual harassment may be directed at members of the same or opposite sex and includes harassment based on sexual orientation. A person's motive or intention is irrelevant to whether their actions constitute sexual harassment.
- iii. All HFHF Staff and HFHF representatives commit to the following safeguarding principles and SEAH prevention standards (as established by the United Nations) both at work and away from work:

- (a) We will never engage in sexual exploitation or abuse and sexual harassment.
  - (b) We will never engage in sexual activity with a child (person under the age of 18) regardless of the age of majority or age of consent locally. Mistaken belief in the age of a child is not a defense.
  - (c) We will never exchange money, employment, goods, or services (including assistance that is due to beneficiaries) for sex, sexual favours, or other forms of humiliating, degrading, or exploitative behavior.
  - (d) We will not engage in a sexual relationship with a beneficiary since it is based on inherently unequal power dynamics and undermines the credibility and integrity of HFHF's charitable mission.
- iv. Such activities constitute gross misconduct and are grounds for termination of the individual's employment or relationship with HFHF. In addition, HFHF will actively support the prosecution of individuals in cases of proven misconduct.

### 3 - Child Protection

HFHF believes that all children, in all circumstances, have the right to feel and be safe and to live free from harm, exploitation and abuse. HFHF strives to be a child-safe organisation and to reduce the risk of child abuse in all aspects of our operations.

#### i. **Prevention of child abuse, exploitation, or neglect**

All HFHF staff and representatives are prohibited from engaging in child abuse, exploitation, or neglect:

- (a) **Physical Abuse:** Physical abuse occurs when a person purposefully injures or threatens to injure a child or young person (such as by punching, kicking, burning, etc.). Physical injury may take the form of bruises, cuts, burns or fractures. It is not always the case that physical injuries will be visible.
- (b) **Emotional Abuse:** Emotional abuse occurs when persistent ill treatment of a child affects their self-esteem. This may include name-calling, rejection, threatening, intimidating or any other acts, which can affect the child's physical and emotional growth, and self-esteem.
- (c) **Sexual Abuse:** Sexual abuse occurs when there has been any (or likely) sexual exploitation of a child by an adult. Sexual abuse includes any actual, attempted or threatened sexual activity involving children (such as intercourse, fondling, oral sex, indecent exposure, exposing the child to pornography, etc.).
- (d) **Commercial Sexual Exploitation of Children (CSEC):** CSEC occurs when a child is sexually abused or exploited in return for cash or any other goods or services. Examples of CSEC include children in prostitution, children involved as subjects in child pornography and child sex tourism.
- (e) **Neglect:** Neglect occurs when a child's basic needs have consistently not been met to the extent that it has a detrimental effect on the child's health and personal development. These basic needs include food, clothing, housing, and supervision.
- (f) **Abandonment:** Occurs when a parent, guardian, or person(s) in charge of a child either deserts a child without any regard for the child's physical health, safety, or welfare and with the intention of abandoning the child, or in some instances, fails to provide necessary care for a child living under their roof.
- (g) **Online Child Sexual Abuse:** the term online child sexual abuse covers a variety of offences (ranging from accessing websites with child abuse material to online grooming). The term child abuse material (CAM) refers to any form of child pornography, video, pictures or even text.

Such activities constitute gross misconduct and are grounds for termination of the individual's employment or relationship with HFHF. In addition, a significant failure to report suspicions that such activities may be occurring by another HFHF representative will not be tolerated and can result in disciplinary consequences, up to and including termination (as discussed in Section (2)). Furthermore, HFHF will actively support the prosecution of individuals in cases of proven misconduct.

**You are responsible for notifying the HFHF Safeguarding Officer and HFHF National Director and taking the next appropriate steps.**

**It is mandatory under Fiji Law for suspicions of child abuse to be reported to the Ministry of Women, Children and Poverty Alleviation in Fiji.**

ii. **Proactive child protection**

HFHF will design its programs and execute its mission in alignment with the following standards:

- (a) We will always keep the health and safety of children paramount.
- (b) We will consider child safeguarding in project planning and implementation to determine potential risks to children that are associated with project activities and operations.
- (c) We will work to ensure that personal dignity and respect for children is maintained through all projects, programs, and departments.
- (d) We will apply measures to reduce the risk of child abuse, exploitation, or neglect, including, but not limited to:
  - (1) Limiting unsupervised interactions with children.
  - (2) Prohibiting exposure to pornography.
  - (3) Complying with HFHF data responsibility standards, as well as applicable laws, regulations, or customs regarding the photographing, filming, or other image-generating activities of children.
- (e) We will ensure compliance with Fiji child welfare and protection legislation or international standards (whichever gives greater protection).

#### 4 - Prohibition of Prostitution, Trafficking and Forced Labor

- i. **Prostitution:** HFHF expressly prohibits sex trafficking and the procurement of commercial sex acts by any HFHF representative. We will never exchange money, employment, goods, or services (including assistance that is due to beneficiaries) for sex, sexual favours, or other forms of humiliating, degrading, or exploitative behavior. These standards always apply (including when on leave or off duty) and even when commercial sex acts are legal in the local context.
- ii. **Pornography:** HFHF expressly prohibits all HFHF representatives from accessing, possessing, or circulating pornographic content using HFHF computers, HFHF email accounts, HFHF-related electronic distribution lists, or an internet connection paid for by HFHF. This includes sharing emails or group texts (including jokes) containing explicit images with HFHF colleagues, and these standards always apply, even when on leave or off duty. Such actions violate HFHF's commitment to create and maintain an environment that prevents harassment and sexual exploitation or abuse, and therefore will result in disciplinary consequences, up to and including termination, against the individual(s) involved.
- iii. **Human Trafficking and Forced Labor:** HFHF expressly prohibits human trafficking (sometimes referred to as "modern slavery") and the use of forced labor by any HFHF representative. As a result, HFHF will never:
  - (a) Destroy, confiscate, or otherwise deny staff access to their identity or immigration documents.
  - (b) Fail to offer transportation for a staff to return to their home country/island where appropriate (such as when they were recruited by HFHF to work outside of their home country/island and where return transportation was agreed in their benefits or contract).
  - (c) Solicit a person for employment using materially false or fraudulent pretenses, representations, or promises regarding that employment.
  - (d) Charge staff recruitment fees.
  - (e) Provide or arrange housing for a staff member that fails to meet reasonable local housing and safety standards.

- iv. **Dangerous or Exploitative Child Labor:** While HFHF actively welcomes volunteers, HFHF has standards to safeguard the labor provided by children. These standards are designed to prevent the economic exploitation of children and protect their health, safety, and morals.
- v. At a minimum, HFHF requires affiliates, implementing partners and suppliers to comply with child labor standards consistent with United Nations requirements, such as those detailed in Attachment I.
- vi. Parental or guardian permission is required for any child under the age of legal majority (usually 18 years) to work at a HFHF job site.

## 5 - Required Reporting Protocols for Potential Safeguarding Misconduct

### i. Expectations for reporting

All HFHF representatives (especially supervisors and managers) have a responsibility to report potential safeguarding misconduct.

- (a) HFHF representatives are expected to be able to recognise and be alert for the signs of potential safeguarding misconduct, such as abuse, harassment, exploitation, or neglect.
- (b) HFHF's Whistleblower Policy expressly prohibits retaliation and protects individuals, including their anonymity and safety, who share good faith concerns of misconduct from retaliation or any threat of retaliation by any other HFHF representative. Anyone who engages in retaliation will be subject to discipline, including termination of employment. (Note: intentional submission of false allegations is a fraudulent activity and will be handled in accordance with HFHF's policies.)
- (c) Significant failure to make a timely report of potential safeguarding misconduct (especially by supervisors and managers) will be subject to discipline, up to and including termination of employment.

### ii. Protocols for reporting

Any HFHF representative who receives a safeguarding complaint or who has knowledge or reasonable suspicion of safeguarding misconduct (whether by a HFHF representative or another aid worker) must:

- (a) **Immediately:** Notify their direct supervisor via established reporting protocols. If the individual has reason to believe that their direct supervisor may be involved in the misconduct (or feels significantly uncomfortable raising such concerns to their supervisor), they must immediately notify:
  - (1) A higher-level supervisor in their reporting line; or
  - (2) The HFHF Safeguarding Officer, the HFHF Internal Audit department, or use the Habitat Ethics and Accountability Line
- (b) **Within 48 hours:** Also ensure that the concerns of safeguarding misconduct are entered into the Habitat Ethics and Accountability Line, Habitat for Humanity's confidential, anonymous reporting hotline and central tracking repository for allegations of serious misconduct.
- (c) Due to the sensitivity of such situations, the individual who receives a safeguarding complaint SHOULD NOT START ANY INVESTIGATIONS (including gathering preliminary evidence or questioning the survivor, the accused or any potential witnesses after the initial complaint is received), but rather report the concerns to the HFHF National Director and the Habitat Ethics and Accountability Line, and coordinate any follow-up actions with the HFHF Safeguarding Investigation Committee using the protocols in Section (D7) below.

*Note: These reporting protocols do not replace, but instead supplement, the local reporting community-based feedback mechanisms (such as a dedicated local complaint email address, a local hotline, a community suggestion, or complaint box, etc.) All safeguarding complaints raised through community-based feedback mechanisms must be added to the Habitat Ethic and Accountability Line within 48 hours as discussed in Section (D5iib) above.*

## 6 - Protocols for Survivor Assistance

- i. HFHF's support to alleged victims of safeguarding misconduct (or survivors) will be provided regardless of the status or outcome of an investigation. Furthermore, the HFHF Whistleblower Policy expressly prohibits retaliation and protects individuals who share good faith concerns of misconduct from retaliation or any threat of retaliation by any other HFHF representative. Upon receipt of an allegation of safeguarding misconduct, HFHF will consider providing any or all the following forms of survivor assistance, as appropriate depending on the nature of the allegations, the circumstances involved, and the informed consent of the survivor:
  - (a) **Immediate material care:** Direct and/or funding support to provide temporary needs such as trauma-informed medical care, food, clothing, or emergency and safe housing, as necessary.
  - (b) **Psychosocial support:** Referrals and/or funding support to obtain appropriate psychosocial services through a local counseling organisation. Comparable services or alternative culturally sensitive psychosocial support will be made available to survivors through appropriate local service providers.
  - (c) **Legal and advocacy support:** Support to obtain victim advocacy services or legal counseling to make an informed decision about pursuing legal recourse.

(Note: Habitat for Humanity Fiji's legal counsel will not directly represent a survivor, as such an activity would pose an inherent conflict of interest.)
- ii. In considering any of the above forms of support, HFHF will consult with both the survivor and with appropriate local specialists. All decisions related to survivor assistance must be documented.

## 7 - Investigation Protocols

Primarily, HFHF investigation protocols, for potential safeguarding misconduct will be focused on keeping the survivor safe, minimising harm, and conducting a thorough, impartial investigation. Safeguarding investigations will be performed only by qualified individuals who are:

- (a) Independent from the allegations received.
- (b) Free from the appearance or existence of bias.
- (c) Specifically trained in appropriate safeguarding investigation procedures.

To ensure all safeguarding investigations are handled with appropriate due diligence and professional care, HFHF must convene a Safeguarding Investigation Committee to oversee all such investigations comprised of key stakeholders, including individuals who have been specifically trained in SEAH investigation protocols. The basic processes that must occur during a safeguarding investigation must include the following items:

- i. **Complaint assessment:** Upon receiving an allegation, the Safeguarding Investigation Committee (in consultation with HFHF management, including HFHF Board, where appropriate) will assess the appropriateness of an investigation based on the severity and information provided. In considering this response, HFHF will assess factors such as: whether there is an allegation of a criminal offense, the immediate safety concerns of the survivor and other individuals involved, and risks such as loss of evidence and damage of property.

As there may be circumstances where the performance of an investigation would increase the harm to the survivor, any such actions will be taken only after full consideration of the safety and the informed consent of the survivor, as well as HFHF overall duty of care to the community. The basis for all decisions related to investigation performance or non-performance will be documented.

- ii. **Investigation process:** After assessment of the allegations, as well as the needs and preferences of the survivor, reports of safeguarding misconduct will be either:



- (a) Investigated promptly by, or under the supervision of HFHF Internal Audit, HFHF Human Resources, and/or the HFHF's legal representative in the manner established by the HFHF investigation and resolution processes. Where appropriate during the investigation, HFHF will consult with both the survivor and with appropriate local specialists, especially related to ensuring the safety of the survivor during and after the investigation process.
  - (b) Referred to the appropriate local governmental authority for investigation or inquiry regarding the potential misconduct or violation(s) of law.
- iii. While an investigation is going on and after an investigation, HFHF will take appropriate steps to ensure that the survivor is provided with an environment free of exploitation, abuse, and harassment or bullying. This may include reassigning the complaint's subject to a comparable work assignment on a temporary or permanent basis.
- iv. **Confidentiality:** All investigations will be performed in a way designed to protect confidentiality and will not be disclosed or discussed with anyone other than those who have a legitimate need to know the case's details.
- v. **Documentation:** Where the investigation is performed by HFHF investigators, all investigation procedures, findings, and recommendations will be thoroughly documented in accordance with HFHF policies:
  - (a) Documentation of investigation procedures will be retained in a central repository for HFHF and in alignment with the HFHF Record Retention Policy. To protect confidentiality, access to the information will be restricted as discussed above.
  - (b) A written report or memo summarising the investigation findings and recommendations will be prepared and provided to management for their use in initiating any appropriate remediating actions. Investigation recommendations will specifically include, but are not limited to, any recommendations related to necessary discipline of HFHF representatives, any potential requirements to report findings to local authorities, and necessary improvements to any processes or controls to prevent or reduce future occurrences of the safeguarding misconduct.

[Within 48 hours after the investigation finalisation, a copy of the report must be submitted to the HFHF National Director and should be uploaded to the case previously created to track the incident in Habitat for Humanity's Habitat Ethics and Accountability Line.]

- vi. **Communications with the survivor:** HFHF will provide them with periodic updates on the investigation's status. In addition, HFHF will provide the survivor with a summary of the investigation findings when the investigation is completed.
- vii. **Management remediating actions:** Upon receipt of the investigation report or memo, management will promptly initiate any necessary remediating actions related to investigation findings, including but not limited to:
  - (a) **Internal disciplinary procedures:** If the investigation confirms the allegations of safeguarding misconduct, HFHF will discipline the person who engaged in the safeguarding violation in accordance with the organisations normal disciplinary procedures. For staff members, disciplinary actions will be based upon the seriousness of the offense and could range from a written warning to termination of employment. For other HFHF representatives (donors, board members, volunteers, implementing partners, etc.), the disciplinary actions will also depend on the seriousness of the offense and may result in the termination of their relationship with HFHF.
  - (b) **Pursuing legal recourse:** In addition to internal discipline, if the investigation confirms the allegations of safeguarding misconduct, HFHF is committed to supporting and/or pursuing appropriate legal recourse in instances where a crime may have been committed. Since local laws vary on the definitions and

illegality of certain behaviors (e.g., abuse, harassment, prostitution, adultery, etc.), HFHF will consult with both the survivor and with appropriate local legal counsel, in considering whether to pursue legal recourse. The basis for all such decisions will be documented.

- (c) **Other internal remediating activities:** HFHF and senior management (and Board members where applicable) will be responsible for ensuring HFHF promptly implements all necessary improvements to any processes or controls to prevent or reduce future occurrences of the safeguarding misconduct.

## 8 - Reporting of Safeguarding Incidents

Habitat for Humanity Fiji is part of a global network, and no incident happens in isolation. To increase awareness of risks and decrease the possibility of such incidents, HFHF is committed to ensuring consistent, transparent reporting of confirmed safeguarding misconduct within the following parameters:

- i. Where required by local authorities: HFHF will comply with all relevant requirements related to mandatory reporting of alleged or confirmed safeguarding misconduct to local authorities. Examples may include instances where exploitative or abusive behavior involves a child.
- ii. All such reporting will occur after a joint consultation between HFHF, the local legal counsel, and HFHF's key safeguarding stakeholders (e.g., the HFHF's legal representative, human resources, and/or internal audit).
- iii. Where required or appropriate due to a contractual, legal, or other donor obligation: There are circumstances where it is required or appropriate for HFHF to report alleged or confirmed safeguarding misconduct to external parties such as donors, regulators, or other governing bodies. Decisions related to "whether and what" to report externally under such circumstances will be guided by:
  - (a) Any requirements defined in HFHF's contractual commitments to external parties (e.g., reporting requirements based on a grant agreement, etc.)
  - (b) Any requirements for mandatory reporting of "serious incidents" that are established by charity watchdogs or other governing bodies in the relevant jurisdiction, such as required by the U.K. Charities Commission and other comparable organisations.
- iv. As appropriate to raise awareness and demonstrate public accountability:
  - (a) HFHF's approach for voluntary sharing of information relating to safeguarding misconduct allegations and investigations is guided by the parallel philosophies of transparency (to donors, regulators, and the public) and confidentiality (for the protection of survivors).
  - (b) HFHF may choose to report certain issues to donors or governing bodies where no clear contractual or legal requirement exists but where HFHF determines the disclosure to be in the best interest of the public trust.
  - (c) HFHF will ensure that HFHF Board members receive regular updates on safeguarding allegations and investigations to facilitate effective process oversight.
  - (d) At least annually, HFHF will make available to the public high-level information on safeguarding trends to increase awareness and public transparency.
- v. Wherever possible, information will be presented in a way that protects the survivor's anonymity for confidentiality and safety reasons (except where relevant law might require disclosure).

## 9 - Safeguarding Protocols during Recruitment

- i. To uphold the principles of Safeguarding and Beneficiary and Child Protection, the following steps will be taken during HFHF's recruitment processes, particularly for HFHF representatives whose work brings them in direct contact with beneficiaries and/or children:

**(a) Interview and Selection Process**

Job descriptions will contain references to the HFHF Code of Conduct and HFHF expectations for ethical behavior (including safeguarding). Applicants are notified about required background and reference checks during selection processes. For positions that involve direct contact with beneficiaries, children or child-related projects, any gaps in employment history will be clarified and specific questions about safeguarding (e.g., child safety, situations working directly with beneficiaries or children) may be asked as part of the interview process.

**(b) Criminal Background Checks**

In alignment with the HFHF Background Screening requirements, background checks are undertaken for all staff and certain other HFHF representatives, such as those in direct contact with beneficiaries or children. HFHF reserves the right to not hire staff (or engage with HFHF representatives, volunteers, or contractors) with a prior conviction or misdemeanor directly or indirectly related to sexual assault of a beneficiary or child abuse.

**(c) Reference Checks**

All potential full-time staff undergo at least two comprehensive reference and character checks prior to being offered any position. Such checks are to be documented and filed accordingly. For full-time staff positions that involve direct contact with beneficiaries, children or child-related projects, specific questions regarding the applicant's suitability to work directly with beneficiaries or children may be asked as part of verbal reference and character checks.

HFHF may expand the scope of individuals who receive background screening (as described above) based on additional risk factors or donor requirements to meet the intent of these safeguarding principles.

## 10 - Safeguarding Training

**i. Onboarding**

At the time of onboarding, all HFHF Board members, staff, contractors, and implementing partners must read and provide written acknowledgement of the HFHF Code of Conduct and Safeguarding Policy. In addition, all HFHF staff will complete training related to ethics, safeguarding principles, and appropriate behavior for HFHF representatives.

**ii. Periodic Training**

Refresher and supplementary training will be provided periodically through HFHF standard methods for training and behavior reinforcement, such as staff meetings, in-person training sessions and online training. In addition, for positions that involve direct contact with beneficiaries, children or child-related projects, additional in-depth training may be required. (Note: As part of their responsibilities for creating and maintaining a safeguarding environment, supervisors and managers are responsible for ensuring that the staff reporting to them complete all required training.)

**iii. Additional Resources**

This policy is intended to supplement and provide further context to the HFHF Ethics Covenant, found in the HFHF Code of Conduct and policies such as:

- (a) HFHF Employee Handbook
- (b) Whistleblower Policy

- (c) Fraud Policy
- (d) Home Partner Compliant Process
- (e) Background Screening Policy

It does not supersede or replace these documents, or other relevant HFHF resources or guidance documents (such as HFHF's Community Based Feedback Mechanism guidance and the Habitat Ethics and Accountability Line, which is Habitat for Humanity's confidential, anonymous reporting hotline and central tracking repository for allegations of misconduct).

## E - Other Considerations

1. Any exceptions to this policy must be approved by the ND.
2. When HFHF is not able to comply with, or meet the intent of this policy, the HFHF ND (or their delegate) must document the reasons for their inability to comply and submit alternative actions.
3. HFHF reserves the right to update, revise, or modify this policy as necessary to ensure compliance with evolving laws, regulations, best practices, or internal requirements. Updates may be made at the discretion of HFHF Trustees or the National Director without prior notice to users, employees, volunteers or other stakeholders. It is the responsibility of individuals subject to this policy to regularly review the latest version available to ensure adherence to the most current guidelines and procedures. Continued use of HFHF's services, facilities, or engagement with its policies constitutes acceptance of any updates or modifications made thereto.

## F - Revision History

Date	Modification	Approved by
23 <sup>rd</sup> February 2023	Minor edits	HFHF Board
3 <sup>rd</sup> February 2024	Re-format with minor edits to grammar and spelling	N/A

## G - Attachment

Attachment I - Minimum HFHF Child Labour Requirements

Attachment II - Safeguarding Incident Reporting Form

Attachment III - Policy Acknowledgement Form

## Attachment I - Minimum HFHF Child Labor Requirements

Based on United Nations guidance, the standards below are designed to prevent economic exploitation of children and protect their health, safety, and morals. While these standards primarily discuss work on the jobsite, MyHabitat has additional resources addressing how to engage appropriately and safely with children in other areas of the Habitat for Humanity Fiji mission:

### **Dangerous work - Minimum age: 18 years**

Would include working from a height of greater than six feet or 180 cm, roofing, using power tools or electrically or gas-powered equipment, the use of powder actuated tools, demolition, or excavation.

### **General work - Minimum age: 15 years**

It would include all other construction work, not considered heavy work or dangerous work, including carpentry, siding, plastering, flooring, laying foundations, masonry work, brick making, and finishing work. The use of hand tools would be part of general construction work.

### **Light work - Minimum age: 13 years**

Does not include general construction, or working on a site where general construction is taking place. This would include lot clearing, meal preparation, painting, landscaping, transporting supplies (weight limit appropriate to the child's capacity and not more than 5 – 7 kilos), office work, babysitting, and other similar work. It would also include any other activities (i) which are not likely to be harmful to the health or development of children and (ii) which are not such as to prejudice their attendance at school or their capacity to benefit from the instruction received. It should include:

1. Simple and well-defined tasks.
2. Lack of physical or mental effort could endanger the child's health or development.
3. Limited number of daily and weekly hours of work.
4. Regular breaks and weekly rest of at least 48 hours.
5. No night works.

In situations where homeowner children under the age of 13 accompany their parent or guardian to the job site, these children should do no work or, where unavoidable, only the lightest assistance of volunteer support (such as offering refreshments) or site preparation (such as picking up trash) under parental/guardian supervision.

Affiliate and national organisations should work with relevant subject matter experts in their area to develop alternative ways for children of homeowners to assist their families to complete sweat equity hours or to engage children from the community in the Habitat for Humanity Fiji mission.

## Attachment II - Safeguarding Incident Reporting Form

Info that should be submitted to MSWP re safeguarding or other misconduct

1. Date of this report: \_\_\_\_\_
2. Country: \_\_\_\_\_
3. City/Province: \_\_\_\_\_
4. Date concern was identified or date and time of incident: \_\_\_\_\_
5. Specific location of concern/ incident: \_\_\_\_\_
6. Person(s) involved:

	Person's Name	Contact Information	Job Title or Relationship to HFHF
1			
2			
3			
4			

7. Description of concern/incident: \_\_\_\_\_

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8. Other witnesses (especially HFHF staff) involved:

	Person's Name	Contact Information	Job Title or Relationship to HFHF
1			
2			
3			
4			

9. Was the incident the first of its kind? If not, indicate approximate dates of previous incidents/report.

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10. What HFHF programs, grants, partners, or donors may be impacted by this report?

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11. Name and title of person preparing this report (printed):

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12. Relationship of the person preparing this report to the person involved in this incident:

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13. Signature of person preparing this report:

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**NOTE:** Forward a copy of this report to:

- i. HFHF National Director
- ii. HFHF Human Resources Manager

- iii. HFHF Safeguarding Officer
- iv. [mysafeworkplace@habitat.org](mailto:mysafeworkplace@habitat.org)

## Policy Acknowledgement Form

### Safeguarding Policy

Name: \_\_\_\_\_

Position: \_\_\_\_\_

#### INSTRUCTIONS

1. HFHFs Safeguarding Policy must be read in its entirety, you the trustee, employee, volunteer or affiliate must then name, sign and date this form, to confirm you have understood the policy and agree to abide by its terms and meet the intent of the policy, then the acknowledgement form must be forwarded to the Human Resources department. HFHF must retain the original form for documentation purposes.
2. If you are not able to comply with or meet the intent of HFHFs Safeguarding Policy, then an exception must be requested in advance and sent to the ND for authorisation, and this must include: a) the section of the policy for which the exception is being requested; b) references to any local laws or business justifications; and c) the proposed alternative.

I hereby certify that I have read HFHFs Safeguarding Policy and therefore:

- I acknowledge and confirm that I have fully understand all the sections and requirements of the document and agree to abide by the terms of the policy, and that failure to do so can result in disciplinary action, up to and including dismissal.
- I acknowledge and confirm that I will immediately notify my Direct Supervisor or HFHFs ND if I see or suspect anything that can be considered an exception to this policy.

Acknowledgement:

\_\_\_\_\_

(Signature)

\_\_\_\_\_

(Date) dd/mm/yyyy)